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AUDUBON OF SOUTHWEST FLORIDA \*\* AUDUBON SOCIETY OF THE EVERGLADES  
BROWARD COUNTY AUDUBON SOCIETY \*\* CLEAN WATER ACTION  
COALITION OF NATIONAL PARK SERVICE RETIREES \*\* COLLIER COUNTY AUDUBON SOCIETY  
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FLORIDA KEYS CHAPTER OF THE IZAAK WALTON LEAGUE OF AMERICA  
THE FLORIDA KEYS CITIZENS COALITION \*\* FLORIDA KEYS ENVIRONMENTAL FUND  
FLORIDA NATIVE PLANT SOCIETY \*\* FLORIDA OCEANOGRAPHIC SOCIETY  
FLORIDA WILDLIFE FEDERATION  
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SIERRA CLUB-LOXAHATCHEE GROUP \*\* SIERRA CLUB-MIAMI GROUP  
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February 16, 2009

Nancy Sutley  
Chair  
The White House Council on Environmental Quality  
1600 Pennsylvania Ave NW  
Washington, D.C. 20500

**RE: Executive Call to Action to Restore America's Everglades: Outlining Priorities for the Obama Administration**

Dear Chairwoman Sutley:

Ecosystem restoration is an issue of national interest and should be a national priority. In particular, the protection and restoration of America's Everglades, the largest sub-tropical wilderness in the nation, and its associated ecological services is an essential part of a national ecosystem restoration program. Everglades restoration is important for job creation, public water supply, protecting our natural heritage and the unique south Florida environment, and mitigating effects from climate change. Most importantly, without the fiscal and political commitment of our Federal government to the restoration partnership, we cannot hope to succeed in this visionary and groundbreaking effort.

We appreciate the opportunity to provide comments to the Obama Administration on this key issue. **The crux of the issue at hand is that significant federal investment in shovel-ready projects along with committed, informed, and effective leadership by the President and his Administration is essential to successful Everglades restoration. The attached white paper, an Executive Call to Action to Restore America's Everglades,** outlines priorities we believe are critical for the Obama Administration to implement

Thank you for this opportunity to share our thoughts. We look forward to discussing these priorities and working with you toward the successful restoration of America's Everglades.

Sincerely,

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The Honorable Lisa Jackson, U.S. EPA Administrator  
The Honorable Peter Orszag, Director, Office of Management and Budget  
The Honorable John Paul Woodley, Jr., Assistant Secretary of the Army for Civil Works  
Colonel Paul Grosskruger, Commander, U.S. Army Corps of Engineers, Jacksonville District  
The Honorable Charlie Crist, Governor of the State of Florida  
Carol Wehle, Executive Director, South Florida Water Management District  
Mike Sole, Secretary, Florida Department of Environmental Protection

## **Executive Call to Action to Restore America's Everglades**

### **Executive Summary**

Significant federal investment along with committed, informed, and effective leadership and accountability by the President and his Administration is essential to successful restoration of America's Everglades. **Restoration success is expediently building and operating projects to provide measurable benefits to the natural system.** From the headwaters of Lake Okeechobee to Florida Bay and the Florida Keys, we look to the Obama Administration to significantly advance long awaited Everglades restoration projects to make a meaningful difference for this imperiled ecosystem.

Everglades restoration requires immediate and significant federal funding to construct authorized projects such as Modified Water Deliveries to Everglades National Park, Kissimmee River Restoration, Indian River Lagoon South, Picayune Strand, Site 1 Impoundment, C-43 Reservoir, Ten Mile Creek, C-111 South Dade, and C-51/STA 1-E. The Administration should push for the expedient appropriation of \$3 billion to implement authorized Everglades restoration projects over the next four years. It makes the most sense, considering the limited federal budget, to invest federal dollars in and implement shovel-ready Everglades restoration projects in the near term; they will deliver the most immediate ecosystem restoration benefits to the natural system.

Programmatic improvements to Everglades restoration will ensure restoration's success over the long term. Planning for critical restoration projects such as the Water Conservation Area (WCA) 3 Decompartmentalization and Sheetflow Enhancement (DECOMP) project should begin immediately. The protection and restoration of America's Everglades, and of other large-scale ecosystems, should be elevated as a national priority through an Executive Order. An Office for Ecosystem Restoration in the Council for Environmental Quality should be created and federal agency attention and resources for ecosystem restoration should be dedicated accordingly. The Administration needs to provide focused and efficient federal funding, leadership, and accountability to ensure successful Everglades Restoration.

## **Executive Call to Action to Restore America's Everglades: Outlining Priorities for the Obama Administration**

### **Issue 1: The Obama Administration should work to prioritize funding for and ensure multi-year funding for Everglades restoration projects.**

Everglades restoration needs significant federal funding to move forward; restoration cannot advance without it. The 2007 Government Accountability Office (GAO) report on South Florida ecosystem restoration stated that from fiscal year 1999 through fiscal year 2006, the federal government contributed \$0.34 billion to CERP while the State of Florida contributed \$2.0 billion.<sup>1</sup> There is a clear need for additional federal funding to implement already authorized CERP projects and for a multi-year funding platform to support the incremental implementation of interrelated suites of restoration projects.

#### **Policy Recommendations:**

- The Administration should push for the expedient appropriation of \$3 billion to implement authorized Everglades restoration projects over the next 4 years<sup>2</sup>.
- The Administration should support developing a dedicated funding source for Everglades restoration such as funding from a carbon tax passed through climate change legislation.
- The President should dedicate \$343.5 million to significantly advance Everglades restoration in the President's 2010 budget proposal and include adequate funding in future budget proposals.<sup>3</sup>
- The Administration should advocate for adequate federal funding dedicated to Everglades restoration projects and other ecosystem restoration projects and ensure this funding is reflected in key agency budgets.

### **Issue 2: While funding authorized Everglades restoration projects, the Obama Administration should concurrently prioritize project planning that is critical to advancing Everglades restoration.**

Key restoration projects necessary to protect the biological diversity of the Everglades and its estuaries and to convey vital waters from north to south require immediate planning. Recent reports highlight several restoration projects in the southern Everglades that have not yet been planned, as those that will yield the greatest ecosystem response. The Committee on Independent Scientific Review of Everglades Restoration Progress' (CISRERP) *Second Biennial Review* report cites findings from Everglades' scientists, which prioritize the Water Conservation

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<sup>1</sup> United States Government Accountability Office. 2007. Report to the Committee on Transportation and Infrastructure, House of Representatives. *South Florida Ecosystem: Restoration Is Moving Forward but Is Facing Significant Delays, Implementation Challenges, and Rising Costs*. Washington, DC: GAO. GAO-07-520: p. 32.

<sup>2</sup> The authorized Everglades restoration projects that need to be funded include: Modified Water Deliveries to Everglades National Park to Everglades National Park, Kissimmee River Restoration, Indian River Lagoon South, Picayune Strand, Site 1 Impoundment, C-43 Reservoir, Ten Mile Creek, C-111 South Dade and C-51/STA 1-E.

<sup>3</sup> For a breakdown of the \$343.5 million requested for inclusion in the President's 2010 budget proposal for Everglades restoration see the letter sent to the Honorable Ken Salazar, Secretary of the Interior, from U.S. Senators Nelson and Martinez, dated January 30, 2009.

Area (WCA) 3 Decompartmentalization and Sheetflow Enhancement (DECOMP) Project as the most important and beneficial restoration project for implementation.<sup>4</sup> DECOMP would restore sheet flow in the southern end of the Everglades by removing the levees and canals that unnaturally stop and redirect water flows. The scientists state that DECOMP will “provide the strongest and most desirable ecosystem restoration responses in the system of South Florida wetlands...”<sup>5</sup> DECOMP is predicated on the completion of the Modified Water Deliveries to Everglades National Park project and also requires the completion of seepage management and Tamiami Trail road modification projects.<sup>6</sup>

The recently released Department of Interior (DOI) Vision Paper further highlights the integrated planning and sequential implementation of the southern DECOMP and seepage management projects as “centers of gravity” in its list of restoration priorities.

In order to deliver the right amount of water to Everglades National Park, planning the second phase of the Tamiami Trail project needs to move forward in tandem with the implementation of the Modified Water Deliveries to Everglades National Park project. Additionally, Tamiami Trail Phase 2 hinges on involving the right partners with the right expertise related to bridge building. The Obama Administration should partner with the State of Florida to move this project forward and should emphasize the importance of involving the U.S. Department of Transportation (DOT) and the Florida DOT in all bridge planning and construction..

The advancement of planning for the DECOMP, Everglades National Park Seepage Management and Tamiami Trail Phase 2 projects concurrent with the implementation of Modified Water Deliveries to Everglades National Park and the Tamiami Trail Phase 1 projects in the southern Everglades are the best investments the Obama Administration can make on behalf of the American people to protect and enhance south Florida’s irreplaceable natural public treasures.

### **Policy Recommendations:**

- The Administration should move forward the recommendations contained in the DOI’s Vision Paper.
- The Administration should prioritize planning for and set deadlines for the completion of the DECOMP, Everglades National Park Seepage Management, and Tamiami Trail Phase 2 projects. The Administration should work with the Corps and DOI as well as the State of Florida to advance the completion of these projects as quickly as possible and consistent with the WRDA 2000 assurances requirements.
- The Administration should task the Everglades Restoration Coordinator with facilitating and closely monitoring the planning of the DECOMP, Everglades National Park Seepage Management, and Tamiami Trail Phase 2 projects, in part through coordination with tribal, federal, state, and local agencies.

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<sup>4</sup> Committee on Independent Scientific Review of Everglades restoration Progress, National Research Council, National Academy of Sciences. 2008. *Progress Toward Restoring the Everglades: The Second Biennial Review*. Washington, D.C.: p. 75.

<sup>5</sup> *Ibid.*

<sup>6</sup> Friends of the Everglades is submitting a separate Priority Recommendation, linking the need to construct water storage reservoirs in the EAA, (The EAA Reservoir), and in Broward County (identified as the C-11 and C-9 Impoundments), all of which are part of CERP, simultaneously with the construction of the DECOMP projects. They believe it is not possible to have the one without the other.

- The Administration should prioritize the planning and execution of the Tamiami Trail Phase 2 project and the inclusion of the U.S. DOT and FDOT in the Phase 2 project design and implementation. The Administration should partner with the State of Florida to advance this project.
- The Administration should facilitate an open and inclusive project planning process that provides for meaningful engagement on behalf of all Everglades restoration stakeholders including the Miccosukee Tribe of Indians and the Seminole Tribe of Indians.
- The Administration should prioritize the planning and construction of CERP projects that focus on preventing damaging water releases to Florida's biodiverse estuaries, such as the Caloosahatchee and St. Lucie, from Lake Okeechobee.

**Issue 3: Ecosystem restoration, including Everglades restoration, should be elevated and prioritized at a national level by the President within the first 100 days.**

The Obama Administration should elevate and prioritize ecosystem restoration, including Everglades restoration, at a national level. Ecosystem restoration, including Everglades Restoration, should be treated as a national program and given priority attention and financial support.

**Policy Recommendations:**

- The President should issue an Executive Order to establish ecosystem restoration as a national program to be treated as a priority by federal agencies including DOI, the Corps, National Oceanic and Atmospheric Administration (NOAA), United States Department of Transportation (U.S. DOT), United States Department of Agriculture (USDA), United States Department of Commerce, the EPA and the United States Department of Justice (U.S. DOJ) within the first 100 days. The Executive Order should include ground rules for focused and efficient federal oversight and coordination to guide ecosystem restoration programs expeditiously. The Executive Order should be prepared in cooperation with all affected federal agencies.
- The Obama Administration should support the petition to the World Heritage Committee to relist Everglades National Park, a World Heritage Site, as "World Heritage in Danger." This petition will be heard at the June 2009 World Heritage Committee meeting in Seville, Spain.

**Issue 4: Enhanced and efficient federal oversight and coordination of Everglades restoration activities, spearheaded by the Obama Administration, is critical to restoration success.**

The Obama Administration has an important oversight and coordination role to play in advancing restoration efforts. The Obama Administration should establish an Office of Ecosystem Restoration under the Council on Environmental Quality (CEQ) and appoint a Regional Coordinator focused on Everglades restoration. An Office of Ecosystem Restoration would elevate ecosystem restoration as a national priority. This office would also foster knowledge sharing between the nation's ecosystem restoration programs and strengthen the

ecosystem restoration enterprise, enhancing its ability to provide environmental benefits and green jobs.

The Everglades Restoration Regional Coordinator would report to the Director of the Office of Ecosystem Restoration on questions of Everglades restoration policy. To advance Everglades ecosystem restoration, this person should work to reconcile interagency differences between federal agencies, to facilitate establishing a clear federal position among federal agencies on important Everglades issues, and to coordinate with the Director of OMB and the Associate Director of Natural Resource Programs at OMB to advance Everglades restoration projects toward Congressional approval and/or authorization and ensure that adequate and timely federal investment follows. This person could provide focused oversight of the South Florida Ecosystem Restoration Task Force. Additionally, this person should oversee the implementation of priority Everglades restoration projects at the federal level and work to resolve or elevate, as appropriate, stakeholder and agency conflicts over project implementation, especially for CERP projects such as the Water Conservation Area (WCA) 3 Decompartmentalization and Sheetflow Enhancement (DECOMP) project and key foundation projects such as Modified Water Deliveries to Everglades National Park. The Everglades Coordinator should convene an Everglades Executive Committee composed of a lead person from each federal agency involved in Everglades issues to enhance federal coordination.

The Everglades Regional Coordinator should work with all federal partners to facilitate a strong partnership with the State of Florida. This role takes on added importance in light of the pending possibility for the State to purchase a significant amount of land in the Everglades Agricultural Area.

### **Policy Recommendations:**

- The President should issue an Executive Order that advances ecosystem restoration as a national priority and calls for the creation of the Office of Ecosystem Restoration at CEQ. This Executive Order should spell out the duties of the Office of Ecosystem Restoration, establish Regional Coordinators for major ecosystem restoration programs in the United States, including Everglades restoration, and articulate the responsibilities assigned to the Regional Coordinators.

### **Issue 5: The Obama Administration should commit to a shared vision of Everglades restoration between the State of Florida and the federal government.**

A stronger federal-state partnership will prove beneficial to all aspects of Everglades restoration. CERP was authorized as a 50/50 State and Federal partnership. The Governor of Florida and the President of the United States have key roles to play in advancing Everglades restoration by providing adequate funding, advancing key projects consistent with the WRDA 2000 assurances and other requirements, and resolving agency and stakeholder conflict.

The present effort by the State of Florida to increase storage and treatment of water in the EAA through its acquisition of critical EAA lands from the U.S. Sugar Corporation stands to benefit the public federal lands in the southern Everglades tremendously. Increased water storage in the EAA means that the much-needed vital water flows from north to south to restore the southern Everglades will be possible. Given this opportunity, the federal/state partnership in restoration takes on even more significance. The federal government should take this important

opportunity to work with the State to strengthen this partnership by providing the funding, leadership, and resources to complement the State's recent and commendable efforts. A strong federal-state partnership will help to maximize the benefits of the EAA land acquisition for Everglades restoration.

### **Policy Recommendations:**

- The Administration should work with the State of Florida to uphold the terms and conditions of the President-Governor Agreement dated January 9, 2002.
- The Administration should develop open lines of communication with the Governor about Everglades restoration funding, priorities, and projects.
- The Administration should encourage a strong partnership with the State of Florida to implement authorized Everglades restoration projects.
- The Administration should collaborate with the State to maximize the restoration benefits of the State's pending EAA land acquisition, including reprioritizing those projects that intend to convey water into the southern Everglades, including the Water Conservation Area (WCA) 3 Decompartmentalization and Sheetflow Enhancement (DECOMP) project, Everglades National Park Seepage Management, and raising Tamiami Trail in the southern Everglades.
- The Obama Administration should coordinate with the State of Florida to ensure that the State executes water reservations to guarantee the timely implementation of authorized CERP projects and to guarantee water for the natural system.

### **Issue 6: The Obama Administration should re-examine the roles and missions of the federal agencies involved in Everglades restoration.**

In recent years the Corps has not been provided sufficient resources and guidance to carry out the majority of Everglades restoration efforts as the principal federal agency in Everglades restoration. At the federal level, the Corps' ecosystem restoration mission should be elevated and positioned on equal footing with the Corps' economic development and public safety directives.

In implementing CERP, the Corps has generally followed both its national Principles and Guidelines guidance document<sup>7</sup> and the CERP Programmatic Regulations, resulting in a cumbersome and frequently duplicative process that has slowed down project planning and overall restoration progress. Additionally, Corps efforts would benefit from additional biological expertise from DOI and EPA to adequately evaluate natural resource benefits, including water quality issues.

The Administration should prioritize and elevate the roles of DOI, EPA and the Department of Commerce (with respect to the National Marine Sanctuary program), agencies with expertise to supplement that of the Corps. In particular, DOI employs numerous staff biologists and ecologists in the National Park Service (NPS), the U.S. Fish and Wildlife Service (USFWS), and the U.S. Geological Survey (USGS) and possesses tremendous biological expertise, which needs to be drawn upon during restoration planning and implementation.

Furthermore, as federal natural resource management agencies, the USFWS and NPS are the direct beneficiaries of the Corps's restoration planning and actions. The NPS and USFWS

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<sup>7</sup> *The Economic and Environmental Principles and Guidelines for Water and Related Land Resources Studies* issued by the Water Resources Council on March 10, 1983.

retain a large stake in restoration outcomes because they will be managing South Florida's national parks, public lands, and wildlife resources for future generations to come.

Improving water quality remains a critical issue for Everglades restoration. For example, water quality is intimately tied to the health of South Florida's public lands, especially those located at the southernmost extent of the Everglades drainage basin. Federal lands, including Everglades National Park, the Loxahatchee National Wildlife Refuge, the Florida Keys National Marine Sanctuary and the Florida Keys National Wildlife Refuge system, would be direct beneficiaries of water quality enhancements in South Florida. EPA is tasked with regulating water quality under the Clean Water Act. EPA should be adequately engaged and provided with additional staff and resources to monitor and improve Everglades water quality issues in concert with the State of Florida, especially those related to Lake Okeechobee. Specifically, additional funding under Section 319 of the Clean Water Act for nonpoint source pollution reduction is critical.

### **Policy Recommendations:**

- The Administration should elevate the role of the Department of the Interior to make it a co-lead agency for Everglades restoration.
- The Administration should seek to simplify Corps rules and regulations to give the Corps more flexibility to address its Everglades restoration missions while maintaining or enhancing protections to assure Everglades restoration.
- The Administration should emphasize the Corps' ecosystem restoration mission through revisions to the Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies.
- The Administration should encourage greater coordination between the Corps, EPA, and DOI. The Everglades Regional Coordinator and CEQ could be given the responsibility for ensuring this coordination through an Everglades Executive Committee.
- The Administration should provide adequate direction, support, and resources to EPA staff tasked with overseeing water quality in the Everglades ecosystem and its surrounding areas.
- The Administration should prioritize additional funding under Section 319 of the Clean Water Act for nonpoint source pollution reduction, especially for areas in and adjacent to the Everglades ecosystem.

### **Issue 7: The Obama Administration should review the charter, effectiveness, and structure of the South Florida Ecosystem Restoration Task Force.**

In its current form, the South Florida Ecosystem Restoration Task Force lacks the focus that previously helped guide its prioritization and coordination roles. The Task Force was given a coordinating and reporting role by WRDA 1996. The Task Force Charter does not give the Task Force authority to make binding decisions or direct specific agency action; however, the Task Force's current structure for executing its intended responsibilities - reviewing and evaluating organizational responsibilities and overcoming interagency conflicts - has not proven to be as effective as it should be. These roles are important, as the Task Force is the only public forum for

federal, state, local, and tribal agencies to come together to coordinate and integrate restoration efforts.

Historically, the Task Force was a federal level decision-making body that provided direction to the Working Group, a Florida-based body composed of senior officials representing tribal, local, state and federal entities. The Task Force relied on the Working Group to help the Task Force identify issues, execute priorities, and coordinate the implementation of Everglades ecosystem restoration. The Working Group carried out the majority of the on-the-ground research and coordination activities. The Working Group would only elevate very important issues or conflicts to the Task Force for decision-making. This streamlined model may serve as a high-quality template for re-evaluating the Task Force.

### **Policy Recommendations:**

- The Administration should direct the Secretary of Interior to re-emphasize the original duties of the South Florida Ecosystem Restoration Task Force, especially as intended in Sections 2a and 2b of its Charter, to provide recommendations to the Corps and SFWMD and to develop policies, strategies, etc. for the restoration of the Everglades.
- The Administration, through the Everglades Coordinator, should direct the federal representatives on the Task Force to raise and seek to resolve with the other government leaders the challenges of Everglades restoration in an open, publicly accessible forum.
- The Administration should review the roles of the Working Group and Science Coordination Team, and evaluate the Task Force's interactions with these bodies
- The Administration should explore other integrated multi-agency decision-making bodies tied to other ecosystem restoration programs to determine if further improvements for the Task Force exist.

### **Issue 8: The Obama Administration should appoint people to critical environmental policy positions who are educated about and committed to ecosystem restoration, including Everglades restoration, and who are willing to develop creative solutions.**

It is absolutely essential that the Administration appoint people who are willing to build on their past experiences but who are also willing to develop new and innovative approaches for advancing Everglades restoration. Appointing people from a variety of professional backgrounds and workplaces is highly desirable. We applaud the Administration's recent appointments of Ken Salazar, Nancy Sutley, Lisa Jackson, and Carol Browner.

### **Policy Recommendations:**

- The Administration should name people who are educated about and committed to ecosystem restoration, including Everglades restoration, to positions such as:
  - Deputy Secretary and Assistant Deputy Secretary of the Department of the Interior

- Assistant Secretary and Deputy Assistant Secretary of Fish, Wildlife and Parks at the Department of the Interior
- National Park Service Director
- Assistant Secretary of the Army for Civil Works
- EPA Assistant Administrator for Water
- EPA Region 4 Regional Administrator
- The Associate Director of the Natural Resource Programs at the Office of Management and Budget
- Department of Justice Assistant Attorney General for the Environment and Natural Resources Division
- CEQ positions
- U.S. Fish and Wildlife Service Director
- NOAA Director

**Issue 9: The Obama Administration should enhance science as a tool in Everglades restoration decision-making and priority-setting.**

There are many talented and knowledgeable scientists at the NPS, USFWS, USGS, NOAA, and at other agencies who are working on Everglades restoration. Their expertise should be given full and open consideration in dialogue about restoration project planning and implementation. Everglades restoration policy should be built on sound and credible science, as called for in WRDA 2000.

**Policy Recommendations:**

- The Administration should ensure that federal agencies consider sound and credible science in their decision-making on Everglades restoration.
- The President should issue an Executive Order that advances ecosystem restoration as a national priority and underlines the importance of sound and credible science in restoration planning, implementation, and decision-making.

**Issue 10: The Obama Administration should ensure that Everglades restoration planning and authorization frameworks support timely and comprehensive ecosystem restoration as an integrated program, rather than as a series of isolated projects.**

CERP is a comprehensive ecosystem restoration plan made up of 68 project components designed to work together to restore America's Everglades. The Administration should move away from the idea that CERP (and other comprehensive ecosystem restoration programs) can be planned, authorized, and implemented as a series of isolated projects. Such planning denies the integrated nature of CERP, in which suites of projects are intended to work together to yield maximum ecosystem benefit. Thus, there should be a shift to planning and analyzing project bundles (interrelated suites of projects) rather than isolated individual projects.

Furthermore, in Everglades restoration, the Corps and the OMB use the Next-Added Increment (NAI) analysis as the framework for project justification and decision-making. This application of NAI requires that each individual CERP project demonstrate significant benefit to the ecosystem on its own in order to justify its costs. The NAI project justification framework

contradicts the ecosystem-wide restoration goals and objectives of CERP and is often a roadblock to important restoration projects. As the Committee on Independent Scientific Review of Everglades Restoration Progress (CISRERP) notes, this approach “fails to recognize that CERP’s purpose is to restore an ecosystem rather than build a particular project.”<sup>8</sup>

Instead, the project justification analysis involved in CERP project planning should focus on a systematic assessment of the collective environmental benefits of interdependent CERP components (project bundles) rather than on requiring justification for individual CERP projects. However, accountability measures should be put in place to ensure that each increment of a project bundle provides a fair proportion of benefits to the natural system.

Consistent project authorization leads to consistent appropriation. However, there was a seven-year gap between the passage of WRDA 2000 and WRDA 2007, resulting in the delayed submission of key restoration projects to Congress for authorization (and, subsequently, appropriation). The Administration should prioritize a consistent two-year authorization process for the Water Resources Development Act or explore the development of a new authorization vehicle focused solely on ecosystem restoration projects, such as the Water Resources Restoration Act currently under development. Whatever authorization framework is adopted, the Administration should retain the necessary legal assurances identified in WRDA 2000 for Everglades restoration.

### **Policy Recommendations:**

- Through an Executive Order that advances ecosystem restoration as a national priority, the President should direct OMB and the Corps to take an integrated project planning and assessment approach, which advances system-wide restoration. This Executive Order should also 1) direct the Corps to adopt an integrated review process, similar to the DOI’s, for Everglades restoration in order to expedite project planning and authorization and 2) set time limits for Corps review processes.
- Through an Executive Order that advances ecosystem restoration as a national priority, the President should make timely authorizations for ecosystem restoration projects a priority. This could include supporting the passage of a Water Resources Restoration Act or programmatic authority.
- CEQ, OMB, and the Assistant Secretary of the Army for Civil Works should work together to review and approve multi-component Project Implementation Reports made up of interrelated suites of Everglades restoration projects.

**Issue 11: The Obama Administration should prioritize building resilient ecosystems through ecosystem restoration in order to bolster the ability of our natural infrastructure to mitigate and slow climate change. Additionally, the Administration should prioritize funding for climate change planning and preparation activities that protect America’s ecosystems, including the Everglades.**

The restoration of the Everglades is vital because it will enhance this wetland system’s ability to mitigate and slow climate change. USGS scientists have documented that wetlands,

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<sup>8</sup> Committee on Independent Scientific Review of Everglades restoration Progress, National Research Council, National Academy of Sciences. 2008. *Progress Toward Restoring the Everglades: The Second Biennial Review*. Washington, D.C.: National Academies Press. See page 82.

under the right conditions, are important carbon sinks and may sequester more carbon than forests.<sup>9</sup> Moreover, the Miami-Dade County Climate Change Advisory Task Force has asserted that an increase in freshwater flows in the Everglades system from restoration will slow saltwater intrusion from sea level rise into South Florida's aquifers and ecosystems.<sup>10</sup>

Resources have not been adequately allocated by the federal government to protect the plants and wildlife in the Everglades and other ecosystems from the effects of climate change. Already, rising ocean temperatures and acidification linked to climate change are degrading the Florida Keys coral barrier reef system.<sup>11</sup> Additional scientific resources and funding will enable agencies responsible for Everglades stewardship and restoration, including the National Park Service and NOAA, to prepare climate change vulnerability assessments and response plans.

### **Policy Recommendations:**

- The Administration should fund additional scientific research on ecosystem adaptation and resiliency in order to increase opportunities for the protection of America's treasured ecosystems.
- The Administration should prioritize funding for the preparation of climate change vulnerability assessments and response plans for ecosystems, including the Everglades system.
- The Administration should advocate for the creation of National Park Climate Adaptation Plans by the National Park Service for Everglades National Park, Biscayne National Park, Dry Tortugas National Park, and Big Cypress National Preserve.
- The Administration should support climate change legislation that funds wildlife adaptation needs for major ecosystems, including the Everglades, national parks, and other public lands.

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<sup>9</sup> United States Geological Survey. 2008. *An Introduction to Carbon Capture Farming and the USGS Research Project*. PowerPoint presentation prepared for Deputy Secretary of the DOI, Lynn Scarlett. United States Geological Survey. 2008. *Carbon Capture Farming: A new future for subsided Delta lands?* Briefing Paper. Available: [http://ca.water.usgs.gov/news/carbon\\_briefing.pdf](http://ca.water.usgs.gov/news/carbon_briefing.pdf)

<sup>10</sup> Miami-Dade County Climate Change Advisory Task Force. April 2008. *Second Report and Initial Recommendations*. Available: [http://www.miamidade.gov/derm/climate\\_change.asp](http://www.miamidade.gov/derm/climate_change.asp); p. 11.

<sup>11</sup> Because of the effects of climate change, two coral species, Elkhorn and Staghorn corals, are now listed as federally endangered.

## ADDENDUM 1: The Importance of Everglades Restoration

## The Importance of Everglades Restoration

Everglades restoration will provide multiple environmental and economic benefits. Everglades restoration can generate critically needed economic stimulus for south Florida. There are numerous opportunities for green job creation in construction, engineering and the sciences. Constructing shovel-ready Comprehensive Everglades Restoration Plan (CERP) projects will create thousands of green jobs and will help to revive the south Florida economy.

Restoring the Everglades will enhance this wetland system's ability to mitigate and slow climate change. U.S. Geological Survey scientists have documented that managed wetlands, under the right conditions, may be important carbon sinks and may sequester more carbon than forests.<sup>12</sup> Moreover, the Miami-Dade County Climate Change Advisory Task Force has asserted that an increase in freshwater flows in the Everglades system will slow saltwater intrusion from sea level rise into South Florida's aquifers and ecosystems.<sup>13</sup>

Everglades restoration is in the federal government's interest - it will benefit the extensive federal landholdings throughout the South Florida ecosystem by restoring the natural system. The Senate Report on *Restoring the Everglades, An American Legacy Act of 2000* underlines the magnitude of federal investment in the South Florida ecosystem. The Report states: "Approximately half the lands that comprise the natural system in the South Florida ecosystem are Federally-managed lands, and these Federal lands will realize substantial benefits through the implementation of the CERP."<sup>14</sup> Specifically, the federal government owns and operates Big Cypress National Preserve, Biscayne National Park, Everglades National Park, Dry Tortugas National Park, the Florida Keys National Marine Sanctuary, the Rookery Bay National Marine Estuarine Research Reserve and sixteen National Wildlife Refuges, including A.R.M. Loxahatchee National Wildlife Refuge, the J.N. Ding Darling National Wildlife Refuge and the Ten Thousand Islands National Wildlife Refuge. All of these natural treasures, owned by the American public, will greatly benefit from restoration initiatives. These are incredibly biodiverse and unique public lands. For example, Everglades National Park is "a nationally and internationally significant resource."<sup>15</sup> It is the only subtropical wilderness in the United States and is home to 68 threatened and endangered plants and animals. Together, Biscayne National Park, the Florida Keys National Marine Sanctuary and Dry Tortugas National Park protect the third-largest coral reef system in the world. In addition, the rare and precious Florida Keys ecosystem, situated at the southern end of the Everglades system, is home to four National Wildlife Refuges and is an important nursery ground for wading birds and marine species.

The Everglades ecosystem supplies the water to South Florida's cities and farms. By 2025, the approximately 7.3 million residents living in Florida's lower East Coast region (Palm Beach, Broward and Miami-Dade Counties) will depend on the Everglades for drinking water.<sup>16</sup>

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<sup>12</sup> United States Geological Survey. 2008. *An Introduction to Carbon Capture Farming and the USGS Research Project*. PowerPoint presentation prepared for Deputy Secretary of the DOI, Lynn Scarlett.

United States Geological Survey. 2008. *Carbon Capture Farming: A new future for subsided Delta lands?* Briefing Paper. Available: [http://ca.water.usgs.gov/news/carbon\\_briefing.pdf](http://ca.water.usgs.gov/news/carbon_briefing.pdf)

<sup>13</sup> Miami-Dade County Climate Change Advisory Task Force. April 2008. *Second Report and Initial Recommendations*. Available: [http://www.miamidade.gov/derm/climate\\_change.asp](http://www.miamidade.gov/derm/climate_change.asp); p. 11.

<sup>14</sup> Senate Report 106-363 "*Restoring the Everglades, An American Legacy Act; Report of the Committee on Environment and Public Works United States Senate together with Minority Views to accompany S.279*": p. 15.

<sup>15</sup> Everglades National Park Protection and Expansion Act of 1989. Pub. L. 101-229, Dec. 13, 1989, 103 Stat. 1946 (16 U.S.C. 410r-5 et seq.). See Section 101(a)(1)

<sup>16</sup> South Florida Water Management District. February 2007. *2005-2006 Lower East Coast Water Supply Plan Update*. Available: [http://www.sfwmd.gov/portal/page?\\_pageid=1874,4166676,1874\\_4166446&\\_dad=portal&\\_schema=PORTAL](http://www.sfwmd.gov/portal/page?_pageid=1874,4166676,1874_4166446&_dad=portal&_schema=PORTAL); p. 5-6.

Replumbing the system to deliver clean water at the right times and in the right amounts across the Everglades will not only safeguard this system's unique ecological features and species populations, but ensure the future of south Florida's population.

Importantly, as the largest ecosystem restoration program being carried out in the world, Everglades restoration clearly serves as a model for other restoration programs. All eyes rest upon the success of Everglades restoration. It is a barometer of sorts, which will indicate whether or not ecosystem restoration, which hinges on a federal-state partnership, is practicable, achievable, and beneficial. Our success will indicate the nation's desire to fix our previous mistakes. As a nation that prides itself on being able to find a way to fix anything, America must continue in its quest to restore this unparalleled wilderness habitat that sustains an enormous diversity of life.

The time for action on Everglades restoration is now. The Committee on Independent Scientific Review of Everglades Restoration Progress (CISRERP) noted in its *2008 Biennial Review* of Everglades restoration progress that "Unless near-term progress is achieved on major restoration initiatives, including the Comprehensive Everglades Restoration Program (CERP) and non-CERP efforts, opportunities for restoration may close with further loss of species numbers and habitat deterioration, and the Everglades ecosystem may experience irreversible losses to its character and functioning."<sup>17</sup>

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<sup>17</sup> Committee on Independent Scientific Review of Everglades restoration Progress, National Research Council, National Academy of Sciences. 2008. *Progress Toward Restoring the Everglades: The Second Biennial Review*. Washington, D.C.: p. 3.