



Carlos A. Gimenez, Mayor

Department of Regulatory and Economic Resources

Environmental Resources Management

701 NW 1st Court, 4th Floor

Miami, Florida 33136-3912

T 305-372-6754 F 305-372-6759

miamidade.gov

August 9, 2019

Ms. Marie Huber, Project Manager
U.S. Army Corps of Engineers
Jacksonville District, PM-EE
701 San Marco Blvd
Jacksonville, FL 32207-8175

Re: BBCW Phase Two Draft Project Management Plan (PMP) Comments

Dear Ms. Huber:

Miami-Dade County appreciates the opportunity to provide the following comments on the draft PMP for the BBCW phase two project:

- The Army Corps should consider the potential need to expand the conveyance capacity of one or more of the regional canals (C-1, C-102 and C-103) in order to convey more water coastward from the L-31 N canal so that any additional water from the regional system could potentially be utilized by the BBCW phase two project. We note that some of the locations where canal improvements may be needed are located outside the original BBCW study area. The ability to transfer water from the C-1 and C-2 to the C-100 canal system should also be considered, although we note that this may require a pump station at the S-122 structure due to higher stages in the C-100 canal system.
- In order to facilitate the seasonal agriculture drawdown in the basins drained by the C-102 and C-103 canals, the SFWMD lowers the triggers at the coastal water control structures S-21A and S-20F annually in mid-October. This is a longstanding practice in support of winter row crop farming in the area. Much of this row crop farming has given way to other land uses including container nurseries, tree farms and housing developments over the years. However, there remains significant row crop farming in the area around the C-103 Canal south and southwest of Homestead Air Reserve Base. With current and projected rates of sea level rise, it appears that the efficacy of the seasonal drawdown may decrease to a point sometime during the CERP planning horizon when the ability to draw down the water via gravity flow may no longer be sufficient to sustain this historical agricultural practice. Furthermore, sea level rise is projected to result in additional inland migration of the salt front as well as increased groundwater levels. Therefore, the phase two alternatives analysis should consider these factors in identifying strategies to better manage water within this area in support of both seasonal agriculture as well as protection of the aquifer from salt intrusion as an eventual replacement to the current agricultural drawdown practices.
- Reservoirs and STAs were screened out during the initial BBCW planning process prior to selection of Alternative O as the TSP. This decision occurred prior to the BBCW project being separated into phases. However, in light of recent seagrass die-offs in Biscayne Bay and increasing concerns with algal blooms and nutrient inputs from the canals to Biscayne Bay, a greater planning emphasis on opportunities for water quality improvement and for additional water storage during phase two is recommended, particularly for the canals with the most significant flows and nutrient loading inputs to the Bay such as the C-103 canal. This should include consideration of conventional STAs and reservoir storage as well as ASR storage and one or more alternatives that maximize passive storage of water across the remaining freshwater wetland areas.

Delivering Excellence Every Day

Ms. Marie Huber, Project Manager

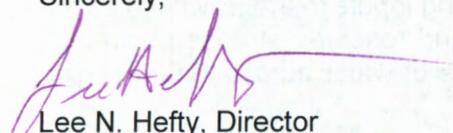
We note that limiting the phase two project area to the small polygons as shown in the Army Corps presentation to the BBRRCT would not provide any areas adjacent to regional canals necessary to site features for the storage or treatment of water from the regional system.

- A greater emphasis (and additional water) is also needed for the southernmost area of BBCW (Model Lands/Card Sound and Barnes Sound wetlands). There is much more information and data now for this area that the PDT did not have the benefit of during the original BBCW PDT planning that led to alternative O as the TSP. This information now includes a robust salt intrusion monitoring network that shows how rapidly salt intrusion is advancing at the base of the Biscayne aquifer in this area. In addition, much more (and more reliable) stage data are now available throughout the wetland areas of the Model Lands and Florida City canal basins to better support further project planning.
- Notwithstanding the recommendation above for the phase two planning effort to emphasize the southernmost area of BBCW, there continues to be a need for additional water and to complete restoration in the "core" BBCW wetland areas north of the North canal (between the C-100 and C-103 canal basins). Limiting phase two as proposed in the draft PMP to exclude all these areas would result in a greatly diminished restoration project in comparison with the Alternate O TSP. Much of the currently available water from the regional canal system is not diverted via the BBCW phase one project even after all phase one features have been completed and are operational. For example, only approximately half of the currently available water from the C-100 canal system and much less than half of the currently available water from the C-103 canal will be diverted to spreader canals once the phase one BBCW project is completed and fully operational. Therefore, to maximize restoration opportunities, the BBCW phase two project should focus on utilizing the remaining volumes of existing water that are not yet diverted through phase one completion, while the project delivery team also seeks to identify additional water sources beyond diversion of existing canal flows.

As requested by Army Corps staff during their BBRRCT presentation, we are also providing input on the July 2, 2019 letter from the SFWMD regarding the C-111 Spreader Canal Eastern project and its potential integration into BBCW during the phase two planning process. Miami-Dade County supports the proposal to plan the C-111 Spreader Canal Eastern project concurrently and in concert with planning of the BBCW phase two project. However, we recommend against combining the two planning projects in one PIR. It will be significantly more complex and difficult to complete the PIR within the 3-year SMART planning timeframes and the likelihood that BBCW would be further delayed would increase if the two projects were combined in one PIR. Combining the projects would also increase the likelihood that planning costs would exceed the three million-dollar SMART planning cap. We also note that the C-111 Spreader Canal Eastern project PIR planning efforts will require sufficient hydrologic data to confirm system response to the S-20 operations change in the Model Lands basin. However, since the Army Corps still has not authorized the deviation request for the operations change at the S-20 water control structure as part of the first phase of the C-111 Spreader project, this vital information is yet to be collected. Miami-Dade County continues to urge the implementation of the S-20 operations changes as soon as possible as this is an important first step to improved water management in the southernmost part of the system.

Thank you for the opportunity to comment on this project. Please contact Craig Grossenbacher at (305) 372-6522 or Craig.Grossenbacher@miamidade.gov if you have any questions or need further information.

Sincerely,



Lee N. Hefty, Director
Division of Environmental Resources Management

c: Drew Bartlett, SFWMD
Adam Gelber, DOI