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< *Submitted via email to* DecompPMComments@evergladesplan.org>

December 9, 2009

Dear Ms. Wilcox,

The Decompartmentalization (Decomp) project is commonly known as the "heart" of the Everglades restoration effort; success depends upon how well and how quickly the U.S. Army Corps of Engineers (Corps) and South Florida Water Management District implement Decomp. We cannot overstate the importance of this critical restoration project: it is our only opportunity to restore historical ridge and slough topography and sheetflow in the central and southern Everglades. The National Research Council (NRC) 2008 Biennial report[1] noted the conclusions of a 2007 ad hoc scientists workshop that determined that a fully successful Decomp project would "provide the strongest and most desirable ecosystem restoration responses in the system of South Florida wetlands, and should be the highest priority for achieving maximum ecosystem restoration benefits." We strongly urge the Corps to make Decomp one if its highest priorities, and we see the Decomp Physical Model (DPM) as a step in the direction of a better, faster implementation of Decomp.

Utilizing principles of incremental adaptive management, the Decomp Physical Model (DPM) will examine performance questions on a comparatively small scale, thus avoiding making large, irreversible mistakes and allowing for implementing restoration on larger scales with more certainty. The DPM is also an opportunity to advance the knowledge needed to achieve real progress on Decomp, with the potential for application to other restoration efforts. Because of its small scale compared to the vast Everglades ecosystem, the DPM poses minimal risk for

[1] Progress Toward Restoring the Everglades: The Second Biennial Review, 2008. National Research Council of the National Academies. The National Academies Press, Washington DC.

irreversible damage of any kind. Therefore, the undersigned organizations fully support the rapid implementation of the DPM, in order to provide insight into existing uncertainties. We have long looked forward to on-the-ground progress toward this critical restoration project, and are encouraged the Corps is moving forward with this step.

While we fully support the implementation of the DPM, there are a few areas where we would offer some specific comments. First, we note that its scale is small compared to the vast Water Conservation Areas (WCAs) and the Everglades ecosystem. As the South Florida Natural Resources Center, Everglades National Park, noted in their scoping period comments: the short duration of the DPM, the relatively small size of the experiment, and the pulsed flow regime will make extrapolating the effects of this experiment to larger scales very difficult. We share similar concerns regarding whether running the DPM in the short time period allotted, with the various constraints on operations, will result in gaining the information needed to proceed with planning future Decomp steps. The NRC's Biennial report[2] noted several similar concerns regarding the DPM, including:

> "Management constraints may prevent moving enough water through the system to allow fair comparison of the ecological implications of complete versus partial canal backfilling" and "The three year assessment period may not allow sufficient time to distinguish treatment effects."

Because of such concerns regarding the extent to which the DPM can help solve key uncertainties, we note that the DPM results should not be the sole source of information for planning for Decomp. The results and lessons learned regarding the extent of backfill needed to achieve sheetflow in other restoration projects, such as the Kissimmee River, have been presented to the Decomp Project Delivery Team, and case studies such as this must be considered alongside results modeled from operation of the DPM.

While we understand that water quality monitoring is critical to the operation of the DPM, we also emphasize that any nutrient or other possible contaminants that enter WCA 3B as a result of DPM operations should not be considered entirely indicative of the extent of water interactions if full degradation of the levees were occurring. Water flowing through the comparatively narrow degraded levee gaps may move at higher velocities than would occur if longer segments of the levee were degraded, and serve to stir up sediments initially, which could contribute to higher nutrient levels, likely temporal, during the monitoring periods. Because the DPM will not operate for a long period of time, there may not be an accurate reflection of whether water quality would eventually return to more acceptable conditions after the initial operation and monitoring. In short, the scope of the DPM will not allow for explicitly ruling out any future actions for achieving restoration, nor should any information learned be used as an excuse to cease pursuing full restoration of the WCAs and the downstream southern Everglades.

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[2] Progress Toward Restoring the Everglades: The Second Biennial Review, 2008. National Research Council of the National Academies. The National Academies Press, Washington DC.

Because the DPM is flexible, adaptable, and reversible, it will advance our understanding of the mechanisms needed to restore and maintain a healthy Everglades by utilizing the principles of adaptive management. Therefore, we support the implementation of the DPM as a step toward advancing the restoration of the "heart" of the Everglades, including downstream Everglades National Park and Florida Bay. Fast progress is needed in the DPM implementation, as well as making the Decomp project one of the top Everglades restoration priorities. As the River of Grass planning efforts, which will greatly affect Decomp, are moving forward quickly, it is imperative to plan Decomp in conjunction with both the River of Grass and Seepage Management projects. True restoration success in the vast Everglades will only occur by coordinating and integrating restoration efforts so they compliment and build on one another.

Sincerely,

<Signatures Waived to Expedite Delivery>

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