US Army Corps of Engineers ®
Jacksonville District

COMBINED OPERATIONAL PLAN (COP) NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMMENT RESPONSE MATRIX – A NEPA scoping letter dated September 22, 2017 was used to invite comments from Federal, State, and local agencies, affected Indian Tribes, and other interested private organizations and individuals. Scoping comments were accepted through October 21, 2017. A Notice of Intent to prepare an Environmental Impact Statement for COP was published in the Federal Register (FR Volume 82, Number 173) September 8, 2017. The following matrix has been prepared in response to the comments received from the September 22, 2017 NEPA scoping letter.

COMMENTER	AGENCY/PUBLIC COMMENT	U.S. ARMY CORPS OF ENGINEERS (USACE) RESPONSE
FEDERAL AGENCY		
UNITED STATES ENVIRONMETAL PROTECTION AGENCY (EPA)		
Comment Date: October 23, 2017		
EPA - 1	**Water Quality:** The EPA recommends the USACE consult with the Florida Department of Environmental Protection (FDEP) to determine each alternative's potential impacts to waterbodies listed on the 303(d) list of impaired waterbodies. The EPA also recommends any water quality impacts be disclosed within the NEPA document. Additionally, the EPA recommends the USACE coordinate with FDEP to ensure compliance with all applicable Clean Water Act (CWA) water quality standards.	Thank you for your comment. The Corps will coordinate and consult with the FDEP in order to obtain water quality certification.
EPA - 2	Tribal Coordination: For NEPA disclosure, the EPA recommends the USACE include feedback and input provided by the tribes within the NEPA document. Additionally, the EPA works closely with both the Miccosukee Tribe of Florida and the Seminole Tribe of Florida on environmental matters and is committed to working with other federal partners to prioritize the Tribes' water quality and water management concerns. EPA encourages consultation and coordination with the Tribes at all levels of decision-making.	The Corps intends to pursue an open and public process and recognizes the obligations that the Corps has to the Miccosukee Tribe of Indians of Florida, the Seminole Tribe of Florida, and the Seminole Nation of Oklahoma. Pursuant to Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments) and in consideration of the Corp's Trust Responsibilities, the Miccosukee Tribe of Indians of Florida, the Seminole Tribe of Florida, and the Seminole Nation of Oklahoma have been asked to participate in Government-to-Government consultation via correspondence dated September 22, 2017, as part of the Corps obligation for coordination under COP. Each of the above listed Tribes were asked at the beginning of the planning process to become cooperating agencies under NEPA for COP via correspondence dated October 13, 2017. Potential impacts to historic sites and traditional cultural properties and practices will be assessed as part of the NEPA and the National Historic Preservation Act process. Each COP alternative will be designed and analyzed to consider the plan that best meets the overall project objectives while minimizing adverse impacts.
EPA - 3	Environmental Justice: The EPA recommends the USACE consider the proposed project's impacts to low income, minority populations as described in "Executive Order 12898 -Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (February 16, 1994). The EPA recommends the USACE disclose any impacts to low income-minority communities in the NEPA document.	Environmental justice will be assessed as part of the NEPA process. Each COP alternative will be designed and analyzed to consider the plan that best meets the overall project objectives while identifying and addressing any disproportionate adverse effects to minority, low income or tribal populations.
NATIVE AMERICAN TRIBES		
SEMINOLE TRIBE OF FLORIDA		
Comment Date: October 13, 2017		

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SEMINOLE TRIBE OF FLORIDA - 1	Thank you for contacting the Seminole Tribe of Florida – Tribal Historic Preservation Office (STOF-THPO) regarding the Combined Operational Plan Modified Water Deliveries and C-111 South Dade Projects, Miami-Dade County, FL. The proposed undertaking area does fall within the STOF Area of Interest. Please continue to consult with us as the COP and the associated NEPA documents are developed. Regarding the offer to participate on the Project Delivery Team, I will forward that on to the appropriate person. Thank you and feel free to contact us with any questions or concerns.	Thank you for your comment. The Corps will continue to coordinate consideration of the Corps' Trust Responsibilities. Please refer to response to comment EPA-2 above.
STATE AGENCY		
FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES (FDACS)		
Comment Date: October 20, 2017		
FDACS - 1	The Florida Department of Agriculture and Consumer Services (FDACS) appreciated the opportunity to provide scoping comments on the development of a Combined Operational Plan (COP) which is being undertaken to define operations for the constructed features of the Modified Water Deliveries (MWD) to Everglades National Park (ENP) and Canal (C-111) South Dade Projects while maintaining the congressionally authorized purposes for the Central and Southern Florida (C&SF) Project. Our comments focus on aspects of the COP that will impact private agricultural lands and agricultural operations. In general, the COP should maintain storm event flood protection capacity lands in local basins adjacent to ENP and provide the same level of service for consumptive water uses.	The 1994 C-111 GRR planning condition represents the minimum level of flood damage reduction defined by the 1994 C-111 GRR recommended plan (ALT 6A). Alternative modeling under COP may provide improved levels of flood damage reduction above those found under ALT 6A, consistent with the identified planning considerations. COP performance for flood protection will be evaluated against the 1994 C-111 South Dade GRR Base Condition. This base condition includes the 1994 C-111 GRR Recommended Plan (ALT 6A) and 1992 MWD GDM recommended plan, which included the 1992 mitigation plan for the 8.5 SMA. The base condition assumes that authorized 1992 MWD GDM and the 1994 C-111 GRR structural features are in place. The 1994 C-111 South Dade GRR Base Condition will be applied to determine if minimum authorized level of "flood protection" is impacted by alternatives. Existing consumptive use permits for water supply will be maintained with implementation of the COP.
FDACS - 2	The routine diversion of water from Water Conservation Area 3A (WCA-3A) to the C-111 Basin must end with the completion of Modified Water Delivery Project, which was one of the design assumptions when the C-111 GRR was approved. S-334 and S-331 are not authorized for WCA 3A flood releases and should not be included in the COP to achieve the sharp reductions in L-29 stages required by the DOT contract even when the WCA 3A stage is high. The goal of COP should be eliminating Column 2 operations and WCA 3 A high water discharges into the South Dade Conveyance System (SDCS) barring emergency operations.	According to the 1994 C-111 GRR (Section 7.10), consistent with the original design of the South Dade County Flood control features and subsequent modifications to the system, the design of all GRR alternatives utilized S-173/S-331 as a divide structure between L-31N canal and C-111 canal under flood conditions. During normal (non-flood) periods, however, a potential for the structural features of both projects to be operated for mutual benefits was identified. A portion of the water to be returned to Northeast Shark River Slough (NESRS) via S-356 as a part of the MWD Project could be discharged southward under some conditions. Such discharges could be made only when there would be no potential increase in flood risk in the C-111 basin. The C-111 GRR (Section 6.18.1) stated, "The Modified Water Deliveries to Everglades National Park Project may permit a restoration of the historic link between the waters of the two project areas, to the benefit of the wide-ranging species that used both basins in historic times. During non-flood conditions, excess seepage water from Shark River Slough collected in L-31 N borrow canal could be passed to the C-111 system for enhanced hydrologic restoration of Taylor Slough." Operating studies were planned to include an evaluation of the need for, and availability of, supplemental water supplies for the C-111 basin. COP will consider and evaluate alternatives which eliminate Column 2 operations and WCA 3 A high water discharges into the South Dade Conveyance System (SDCS). The COP selected plan will be the alternative which best achieves the project objectives while adhering to the project constraints.

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FDACS - 3	The COP should not use S-331 to convey flood waters from the 8.5 Square Mile Area (8.5 SMA) into the SDCS if the current 8.5 SMA flood mitigation project is not adequate to provide the flood protection needed. If the project requires additional work to meet performance standards, that should be identified by Increment 2 so the use of S-331 to alleviate flooding in the 8.5 SMA is not incorporated into the COP.	COP will consider and evaluate alternatives which rely primarily of the S-357 pump station to provide flood mitigation to the 8.5 SMA. However, limited use of S-331 may be necessary to provide flood mitigation to the 8.5 SMA eastern areas and assist S-357 in maintaining flood mitigation for the 8.5 SMA when S-357 operational capacity is limited. The COP selected plan will be the alternative which best achieves the project objectives while adhering to the project constraints.
FDACS - 4	Distribution of water during wet periods should concentrate on maximizing deliveries of water Northeast Shark River Slough (NESRS). Evaluation of the performance of proposed operation should be undertaken using the data now available. Data collected during emergency operations deviation indicates pumping at S-356 does not seem to increase the stage in the L-29 Canal when the canal is above 8.2 feet. This means that with an L-29 constraint of 8.5, the use of S-356 will not necessarily reduce the flow from WCA-3A into NESRS and adding the flow from S-356 may provide a significant benefit to the Park. This is something we should verify as the deviation operations continue since it could provide very useful information in setting the future operating protocols for S-356.	Concur. Consistent with previous field test increments, Increment 2 incorporated the described use of the S-356 structure and will test this proposal. Concurrent with the development of the COP, the Increment 2 operations will be evaluated along with modeling results to determine the most effective use of the S-356 pump station under COP conditions.
FLORIDA DEPARTMENT OF TRANSPORATION (FDOT)		
Comment Date: October 20, 2017		
FDOT - 1	Thank you for providing notice of NEPA study initiation for the Combined Operational Plan for the constructed features of the Modified Waters Delivery Plan. The Florida Department of Transportation is interested in remaining on the mailing list for future notifications regarding this effort. Please continue to forward this information to my attention with cc: to Jason Watts, Director, and Office of Environmental Management at the same address below.	Thank you for your comment. The Corps will continue to coordinate with the FDOT throughout the planning process for COP.
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION (FDEP)		
Comment Date: October 18, 2017		
FDEP - 1	The Jacksonville District, U.S. Army Corps of Engineers (Corps) issued the subject Scoping Notice to gather comments and concerns that will be addressed in a National Environmental Policy Act (NEPA) document for the Combined Operation Plan (COP). The purpose of COP is to define operations for constructed components of the Modified Water Deliveries (MWD) to Everglades National Park (ENP) and the Canal 111 (C-111) South Dade projects, while maintaining the Congressionally-authorized multiple purposes of the Central and Southern (C&SF) Project to include flood control; water supply for agricultural irrigation; municipalities, and industry; regional ground water control and prevention of saltwater intrusion; enhancement of fish and wildlife; and recreation. A bulleted list of objective outlined by the Corps for COP include the following:	Thank you for your comment. The Corps will continue to coordinate with the FDEP throughout the planning process of COP. The bulleted list of objectives outlined by the Corps for COP has been subsequently updated to be consistent with language previously stated in the authorizing documents for the MWD and C-111 South Dade Projects. A bulleted list of objectives is provided below. <u>Objectives</u>: 1. Improve water deliveries (timing, location, volume) into ENP and take steps to restore natural hydrologic conditions in ENP given current C&SF infrastructure and features expected to be completed by the time of implementation, to the extent practicable by a. Changing schedule of water deliveries so that it fluctuates in consonance with local meteorological conditions, including providing for long term and annual variation in ecosystem conditions in the Everglades (Timing) (P.L. 101-229, Section 101b) b. Restoring NESRS as a functioning component of the Everglades hydrologic system (Location) (P.L. 101-229, Section 101b)

COMMENTER	AGENCY/PUBLIC COMMENT	U.S. ARMY CORPS OF ENGINEERS (USACE) RESPONSE
	1. Improve water deliveries (timing, location, volume) into ENP and take steps to restore natural hydrologic condition in ENP given current C&SF infrastructure expected to be completed by the time of implementation, to the extent practical by: a. Changing schedule of water deliveries so that it fluctuated in consonance with local meteorological condition, including providing for long term and annual variation in ecosystem conditions in the Everglades (Timing). b. Restoring NESRS as a functioning component of the Everglades hydrologic system (Location). c. Adjusting the magnitude of water discharge to ENP to minimize efforts of too much or too little water (Volume). 2. Maximize progress toward restoring historic hydrologic conditions in the Taylor Slough, Rocky Glades, & eastern Panhandle of ENP. 3. Protect the intrinsic ecological values associated with WCA-3A and ENP. 4. Minimize the damaging* freshwater flows to Manatee Bay/Barnes Sound through the S197 structure and increase flows through Taylor slough and coastal creeks. 5. Include consideration of cultural values and tribal interests & concerns within EVA-3A and ENP. 6. Explore opportunities for enhancing the recovery of federally and state listed species under the Endangered Species Act, consistent with the restoration objectives, the USACE's authorities for MWD and C-111 projects and operational considerations. 7. Explore objectives to enhance opportunity for flood control and mitigation. The Florida Department of Environmental Protection (Department) appreciated the opportunity to comment, and understand that the substantive details of the operating plan will be addressed in the forthcoming NEPA document, the Department previously provided comments to the Corps on the Cop Scoping Notice on July 7, 2011.	c. Adjusting the magnitude of water discharged to ENP to minimize effects of too much or too little water (Volume) (1992 MWD GDM, Section 44) 2. Maximize progress toward restoring historic hydrologic conditions in the Taylor Slough[1], Rocky Glades, & eastern Panhandle of ENP. 3. Protect the intrinsic ecological values associated with WCA-3A and ENP. 4. Minimize the damaging freshwater flows to Manatee Bay/Barnes Sound through the S197 structure and increase flows through Taylor Slough and coastal creeks (1994 C-111 GRR, Section 5.2) 5. Include consideration of cultural values and tribal interests & concerns within WCA-3A and ENP. Previously identified objectives "6" and "7" within the provided comment have now been captured under planning considerations.
FDEP - 2	The Department recognizes COP as a critical step towards completing the MWD and C-111 projects. Both the MWD and the C-111 Projects that need to be fully operational to continue the progress towards restoration of the Everglades system. The Department recommends expediting the completion of the MWD and C-111 Projects which includes COP, so that components of the Comprehensive Everglades Restoration Plan (CERP) projects can move forward in the near term as envisioned by the State of Florida's Senate Bill	Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion including the required infrastructure identified within prior NEPA documentation (*i.e.* February 2017 Increment 1.1 and 1.2 EA and FONSI) to raise the maximum operating limit of the L-29 Canal beyond the constraint of 7.5 feet, NGVD per the 2012 Water Control Plan. Acquisition of required real estate interests and any associated improvements for the private ownership along Tamiami Trail, including receipt of Tamiami Trail Bridge and roadway channel and flowage easements from the FDOT, has also been completed. The Corps anticipates utilizing lessons learned from the 2016 and 2017 planned and temporary deviations as well as the MWD Project operational field tests (*i.e.* Increment 1, 1.1, 1.2 and 2) in the development of COP. The Corps is working

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	10, as well as expedited projects under Central Evergaldes Project (CEPP) such as the S-333N and Old Tamiami Trail removal.	as expeditiously as possible to complete planning efforts related to COP and the completion of associated NEPA documentation in 2019 to include the Final EIS and ROD.
FDEP - 3	The Department recommends that a comprehensive hydrological evaluation be conducted to ensure that the projects can be operated to meet the goals identified in the Everglades National Park Protection and Expansion Act. The evaluation should include components for the South Dade C&SF Flood protection, high water conditions in Water Conservation Areas (WCA) 2 and 3, and flood mitigation for the 8.5 Square Mile Area (SMA).	The COP study will result in a comprehensive integrated water control plan for the operation of the water management infrastructure associated with the MWD and C-111SD Projects. The COP will include regional hydrologic modeling in order to balance the ecological restoration objectives of the MWD and C-111SD projects while demonstrating compliance with the project constraints. This will include flood mitigation requirements to prevent potential project-induced flood damages in the 8.5 SMA and to maintain the level of flood damage reduction associated with the 1994 C-111 GRR-EIS Recommended Plan. Development of the COP will be informed by the MWD Increment 1, Increment 1.1 and 1.2, and Increment 2 field tests. Data collected in accordance with the Increment 2 monitoring plan developed in consultation with the FDOT will help to inform L-29 Canal operations to be developed for COP. Field Test operations updates and action items will be discussed on a weekly basis between water managers from USACE and SFWMD, as well as ENP when needed, to provide collective interpretation of results and evaluate implementation of Field Test operations relative to the Increment 2 goals, objectives, and constraints. USACE, SFWMD, and ENP water managers, along with FDEP, will continue to meet monthly to discuss the collected data and the results of preliminary analyses, as well as system conditions and Field Test operations; additional technical staff from these agencies who are involved in the Increment 2 monitoring and data assessment efforts will also participate in the monthly coordination meetings, as needed. Results from these weekly and monthly coordination meetings, including preliminary recommendations from water managers to incrementally modify the operational strategy (within the covered NEPA EA scope), will be further discussed with the PDT during regularly-scheduled interagency meetings to occur four times per year.
FDEP - 4	The Department recommends that COP be developed to have operation that are responsive to events to avoid, minimize or eliminate the need State issued Emergency Orders for High Water Conditions in the WCAs and the Ninth Amended Emergency Order for the C-111 South Dade Project.	Operational flexibility was included within the November 2017 Increment 2 EA and Proposed FONSI to allow for a rapid response to extreme high water levels in WCA 3A as a result of the numerous emergency and planned temporary deviations conducted in 2016 and 2017. It is the intent of the Corps to include operational flexibility as appropriate during plan formulation efforts for COP to prevent the need for expedited and/or emergency actions in the future.
FDEP - 5	There is a need to evaluate COP on a broader and more comprehensive scale while meeting the original objectives of both the MWD and C-111 South Dade Projects. This evaluation should consider the assessment of COP alternatives in consideration of ongoing and future State and Federal restoration efforts. The broader more comprehensive evaluation should include reevaluating inflows and outflows of WCA 3, and consideration of features that have been constructed by Federal and State parties under separate authorizations such as the Tamiami Trail Next Steps Phase I project and C-111 CERP project.	COP will define water management operations for WCA 3A and WCA 3B outlets, structures in the L-31N and C-111 Basins constructed as part of the C&SF Project and the recently constructed components of the MWD and C-111 South Dade Projects. The project team is currently reviewing baseline assumptions for the purpose of conducting hydrologic modeling to inform alternative evaluations. The existing condition is intended to represent conditions assumed in place at the time of implementation of the COP Water Control Plan in 2019. This base condition will include the following: (1) MWD Increment 1.1 and 1.2; (2) existing C&SF project infrastructure and Regulation Schedules (including 2008 LORS); (3) MWD Tamiami Trail Modifications 1-Mile Bridge and Raised Roadway; (4) Tamiami Trail Next Steps 2.6 Mile Western Bridge; (5) full construction of C-111 South Dade to include Contracts 8, 8A and 9; (6) 8.5 SMA project features to include C-358 and S-357N; (7) Miami-Dade Limestone Products Association (MD-LPA) 5-mile Seepage Cutoff wall along L-31 North; (8) current permitted operations for the SFWMD C-111 Spreader Canal project components (includes G-737 and S-199/S-200 at expanded 300 cfs each); and (9) the expanded capacity at S-333 completed by SFWMD (component of the Central Everglades Planning Project). Potential operational changes considered during plan formulation efforts during COP will take these projects into account as operational criteria and/or constructed infrastructure will be accounted for in the baseline. Changes to the 2012 Water Control Plan will need to subsequently occur as additional components of CERP are implemented.

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		Regulation schedule changes for WCA-1 and WCA-2 will not be included in the COP, but changes may be included in the COP alternative modeling (e.g. sensitivity run prior to the TSP) in order to ensure sufficient flexibility is included in the COP Water Control Plan to accommodate a future WCA-1 and WCA-2A Regulation Schedule study.
FDEP - 6	The Department notes that the Corps identified objectives for the development of COP that may have excluded previous identified objectives. The Department also noted that the Corps lists project constraints including the Everglades Restoration Transition Plan (ERTP) WCA-3A Regulation Schedule. The Department understanding is that COP would be developed to replace ERTP and the that ERTP was meant to be an interim transition plan, and not a constraint that would be carried forward into COP.	Maintaining Zone A of the WCA 3A Regulation Schedule to not exceed the 1960 WCA 3A 9.5 to 10.5 feet NGVD Regulation Schedule is currently identified as a project constraint; however additional relevant information resulting from the WCA Regional Flood Routing Analysis Study (Baseline and Modification Modeling, or BAMM) will be incorporated into planning efforts once the analysis is available in early 2018. Modifications to the WCA 3A Regulation Schedule below Zone A may be included within the scope of COP pending results of BAMM. Operational modifications proposed under COP will be incorporated into the 2012 Water Control Plan and supersede those identified under ERTP if operational modifications are proposed. Input will be sought from the PDT during alternative development for the COP EIS. Please see response to comment FDEP-1 with regard to the current bulleted list of objectives outlined by the Corps for COP. This list has been subsequently updated to be consistent with language previously stated in the authorizing documents for the MWD and C-111 South Dade Projects.
FDEP - 7	The department is particularly concerned about the newly identified objective (1c) of "Adjusting the magnitude of water discharged to ENP to minimize efforts of too much or too little water (Volume)" as this objective may be used to limit restoration flows to ENP for flood protection purposes. The Department suggests that a more appropriate objective is to maintain the current level of flood protection while maximizing ecologically beneficial flows from WCA-3 and through ENP's Shark River and Taylor Sloughs to Florida Bay. One goal of the authorized project was to construct and operate a flood mitigation project for the 8.5 SMA to ensure that restorative flows to ENP's Shark River Slough would not result in diminished or increased flood protection. The Department requests that the Corps conduct an evaluation of historical conditions compared to post mitigation condition for 8.5 SMA to develop an operation plan that maintains pre-mitigation flood control while allowing periodic event driven extreme flows through SRS. The Department is concerned that the level of flood protection for 8.5 SMA has been enhanced despite the construction of the mitigation features which results in damaging high-water stages in WCA-3. The 8.5 SMA project was authorized to provide flood mitigation and COP evaluation needs to be comprehensive in evaluating that the projects is able to provide the required flood mitigation without restricting Everglades restoration flows to ENP.	The 1983 Base Condition identifies the level of flood mitigation for the 8.5 SMA that will be maintained in the COP process; Base 1983 represents the conditions in the 8.5 SMA before MWD was implemented, consistent with the requirements set forth in the 8.5 SMA 2000 GRR Record of Decision. The MWD field test increments were developed based on extensive evaluation of historical operations data, which have been detailed in the corresponding Environmental Assessment reports. The monitoring plans for surface water hydrology and groundwater hydrology for the MWD Incremental Field Tests (refer to Annex 2 of the Increment 2 Monitoring Plan Appendix C) will continue to provide data to assess performance of the 8.5 SMA project components, including S357 and S-357N (pending construction completion), to maintain the surface water and groundwater levels within the project areas of the 8.5 SMA, between the L-357W Levee and the L-31N Levee at the same levels as existed prior to the implementation of any MWD Project components. As included in the original Increment 1 Operational Strategy, Increment 1.1/1.2 and Increment 2 will also implement a testing protocol to assist in defining operating criteria for the new 8.5 SMA S-357N water control structure following completion of construction (currently anticipated in February 2018). Please see response to comment FDEP-1 with regard to the current bulleted list of objectives outlined by the Corps for COP. This list has been subsequently updated to be consistent with language previously stated in the authorizing documents for the MWD and C-111 South Dade Projects.
FDEP - 8	The Department requests that continued attention to water quality is a critical part of COP formulation, and that specific actions to maintain water quality must be implemented as part of the development of COP. The concerns expressed by the Department in previous correspondence focused on the potential for exceedances of the State's phosphorous criterion due to increased flows into Shark River Slough. Other water quality issues must also be addressed during the development of COP, including the uncertainty surrounding the quantity and quality of water to be released to the Everglades Protection Area (EPA). This concern needs to be carefully	Thank you for your comment. Water quality is being tracked and evaluated during the ongoing testing phases currently being conducted under the authority of the MWD Project (*i.e.* Increment 1, 1.1, 1.2 and 2). Information gained from the MWD Project operational field test swill be incorporated into COP operations. The Corps agrees that initial operations during the transition from dry season conditions to wet season conditions needs to be carefully managed to address potential resuspension of sediments if the operational conditions allow this to be considered in the operations. In extreme weather events, human health and safety concerns take precedence.

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	evaluated in planning for COP including structure operation criterion and water velocity management that could re-suspend sediments (for example: slow opening of S-333 after extended closure).	
FDEP - 9	Regulatory Authorization: The implementation of COP will modify the operations of water management structure within the Southern Everglades and the South Miami Dade Area. Surface water management, which includes operation, is regulated by the Department under Chapters 373 and 403, Florida Statues. Any modification to the existing system may require a permit prior to implementation. The Department strongly recommends that the Corps initiate discussions with the Department early in the planning process to ensure regulatory concerns are appropriately addressed. As mentioned earlier the Department has issued multiple emergency orders to manage the high water operation deviations of the ECAs and L-29 Canal System. The Department trusts that the development of COP will fully evaluate and address all operating conditions of this project and that the need for unplanned emergency deviations will not continue to be part of the future operating procedures.	Thank you for your comment. The Corps will continue to coordinate with the FDEP to ensure all regulatory concerns are appropriately considered. The Corps agrees that working closely with the FDEP through this process is essential.
FDEP - 10	The Florida Department of Environmental Protection (Department) appreciates the opportunity to comment, and understand that the substantive details of the project will be addressed in the forthcoming NEPA document. Department staff looks forward to continued participation throughout the planning process. The department would like to reiterate its commitment to the restoration of the Greater Everglades ecosystem and "getting the water right."	Thank you for your comment. The Corps will continue to coordinate with the FDEP throughout the planning process for COP and encourages the FDEP to continue to attend scheduled PDT meetings for this effort. Information will be distributed to Federal and state agencies as well as stakeholders and interested parties of the public through that forum.
FLORIDA FISH AND WILDLIFE CONSERVATION COMMISION (FWC)		
Comment Date: October 24, 2017		
FWC - 1	FWC staff has reviewed the table of state listed species in the project area that was provided in the letter dated September 26, 2017, from USACE to U.S. Fish and Wildlife Service. The FWC staff has compared the information provided by USACE to the "Florida's Imperiled Species Management Plan" (2016), and has provided a list of state threatened (ST) wildlife consistent with the most recent version of the Imperiled Species Management Plan. Mammals Everglades mink (Mustela vison evergladensis, ST) Birds Black skimmer (Rynchops niger, ST} Least tern (Sterna antillarium, ST) White-crowned pigeon (Patagioenas leucocephalus, ST) Little blue heron (Egretta caerulea, ST) Tricolored heron (Egretta tricolor, ST)	Thank you for the updated list of state listed species that have the potential to occur within the project area. This information will be incorporated into the EIS. All practicable means to avoid or minimize potential negative environmental effects to fish and wildlife resources will be incorporated into the proposed action.

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	Reddish egret (Egretta rufescens, ST) Roseate spoonbill (Plata/ea ajaja, ST} Florida sandhill crane (Antigone canadensis pratensis , ST) Southeastern American kestrel (Falco sparverius paulus, ST) A complete copy of the Florida's Imperiled Species Management Plan (2016) can be downloaded from the MyFWC.com website at http://myfwc.com/media/4 l 33 l67/floridas-imperiled-species-management -plan-20 16- 2026 .pdf	
FWC - 2	High-water Management Strategy The FWC has fish and wildlife and land management responsibilities for the EWMA and has found that hydrology, water depth, and duration of standing water are very important components of wildlife and habitat protection. The FWC has developed a position paper entitled Hydrologic Requirements for the Everglades and Francis S. Taylor Wildlife Management Area dated November 20, 2013 (enclosed). This paper provides biologically based guidance for managing water levels in the Everglades to ensure restoration of fish and wildlife populations, habitat, and diversity so that the goals of the Comprehensive Everglades Restoration Plan (CERP) may be fully realized. FWC staff recommends that the USACE fully incorporates information gained from the emergency and planned temporary deviations that were implemented by USACE in response to extreme high-water conditions in the EWMA. Further, staff recommends that the USACE relies on the biologically based guidance provided in FWC's position paper to develop high-water management strategies that are consistent with this guidance, provides relief for wildlife during periods of extreme high-water, and minimizes recreational impacts.	The Corps recognizes the potential effects of high water stages on fish and wildlife resources within the project area. The project team is currently in the initial stages of planning. The project team will utilize performance measures (*i.e.* depth, distribution, duration of surface flooding etc.) to evaluate alternative plans with regard to potential effects to fish and wildlife resources. These performance measures will be developed in conjunction with the PDT. Additional detailed information on performance measures will be provided as plan formulation efforts for COP continue. The provided information will be reviewed and applied as appropriate. All practicable means to avoid or minimize potential negative environmental effects to fish and wildlife resources will be incorporated into the proposed action. The Corps anticipates utilizing lessons learned from the 2016 and 2017 planned and temporary deviations as well as the MWD Project operational field tests (*i.e.* Increment 1, 1.1, 1.2 and 2) in the development of COP.
FWC - 3	Regulation Schedules for WCA-3B and WCA-2A The EWMA includes WCA-2, WCA-2B, WCA-3A, and WCA-3B. WCA-3B contains highly significant natural resources, managed for natural vegetative communities, wildlife and aquatic species, and recreational uses. WCA-3B supports some of the least impacted tree islands remaining in the Everglades ridge and slough landscape and the maintenance of ecologically compatible water levels is important for the wildlife and ecology. FWC staff supports the development of a regulation schedule for WCA-3B that maintains the ecological quality and supports continued recreational uses.	COP WCA-3A Regulation Schedule updates will be developed based on existing inflows from WCA-1 and WCA-2A; with limited data available for cultural resources within WCA 1 and WCA 2A and requirements for Tribal consultation, updates to the regulation schedules cannot be completed within the 2016 BO timeline for COP. Changes to the WCA 1 and/or WCA 2A Regulation Schedules may be included in the COP alternative modeling (e.g. sensitivity run prior to the TSP) in order to ensure sufficient flexibility is included in the COP Water Control Plan to accommodate a future WCA-1 and WCA-2A Regulation Schedule study. No additional inflows to WCA 3B will be included under the COP, consistent with modifications to the MWD Project concurrent with development of the Central Everglades Planning Project.

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	The COP bulleted document that was distributed to the PDT acknowledges that the USACE is considering the inclusion of WCA-2 in the COP effort. FWC staff supports incorporating WCA-2A regulation schedule revisions that improve the quantity, timing, and distribution of water to promote more natural patterns of inundation.	
FWC - 4	Expedite Current Projects and Plan for Future Project Components The COP is a critical step towards developing a water control plan that makes full use of the available infrastructure and resources constructed under MWD, CERP, Tamiami Trail Next Steps (TTNS), Central Everglades Project Plan (CEPP), and other Everglades restoration programs. FWC staff recommends utilizing all available resources to expedite the MWD and C-111 projects, including the COP to gain full project benefits as soon as practicable. Expediting the remaining components of MWD and the C-111 projects will facilitate raising the L-29 canal constraint up to the 8.5 feet National Geodetic Vertical Datum (NGVD) and hasten the potential benefits of project implementation. FWC staff also recommends that the COP operations strategy not omit or constrain the role of infrastructure projects scheduled for near-term completion. Project components such as the TTNS 2.6-mile bridge, S-333N, the removal of Old Tamiami Trail, and other restoration features will provide great benefits to preventing and managing high-water conditions in the EWMA.	COP will define water management operations for WCA 3A and WCA 3B outlets, structures in the L-31N and C-111 Basins constructed as part of the C&SF Project and the recently constructed components of the MWD and C-111 South Dade Projects. The project team is currently reviewing baseline assumptions for the purpose of conducting hydrologic modeling to inform alternative evaluations. The existing condition is intended to represent conditions assumed in place at the time of implementation of the COP Water Control Plan in 2019. This base condition will include the following: (1) MWD Increment 1.1 and 1.2; (2) existing C&SF project infrastructure and Regulation Schedules (including 2008 LORS); (3) MWD Tamiami Trail Modifications 1-Mile Bridge and Raised Roadway; (4) Tamiami Trail Next Steps 2.6 Mile Western Bridge; (5) full construction of C-111 South Dade to include Contracts 8, 8A and 9; (6) 8.5 SMA project features to include C-358 and S-357N; (7) Miami-Dade Limestone Products Association (MD-LPA) 5-mile Seepage Cutoff wall along L-31 North; and (8) current permitted operations for the SFWMD C-111 Spreader Canal project components (includes G-737 and S-199/S-200 at expanded 300 cfs each); and the (9) the expanded capacity at S-333 completed by SFWMD (component of the Central Everglades Planning Project). Potential operational changes considered during plan formulation efforts during COP will take these projects into account as operational criteria and/or constructed infrastructure will be accounted for in the baseline. Changes to the 2012 Water Control Plan will need to subsequently occur as additional components of CERP are implemented. The Corps is working as expeditiously as possible to complete planning efforts related to COP and the completion of associated NEPA documentation in 2019 to include the Final EIS and ROD.
FWC - 5	L-29 Canal Constraint FWC staff continues to support the development of a water control plan that raises the maximum operational limit of the L-29 canal and maximizes ecologically beneficial flows from the EWMA through Northeast Shark River Slough and Taylor Slough to Florida Bay. FWC staff recommends that the COP alleviate all constraints on the L-29 canal stage up to the 8.5 feet National Geodetic Vertical Datum (NGVD) to facilitate maximum sustained discharges from the EWMA to Northeast Shark River Slough and on to Florida Bay. An operational plan that maximizes opportunities to deliver water from the EWMA will help prevent high-water conditions from developing and support high- water management strategies that minimize potential impacts to area wildlife, their habitat, and recreational uses.	One of the objectives of COP is to improve water deliveries into ENP and take the necessary steps to restore natural hydrologic conditions in ENP given current C&SF infrastructure and features. Under the MWD Project Increment 2 Field Test, the November 2017 EA and Proposed FONSI recognized that under the Preferred Alternative (Alternative B), the L-29 Canal would be operated to ensure the stability and safety of Tamiami Trail (U.S. 41) between S-333 and S-334, in accordance with the September 25, 2008 Tamiami Trail Modifications Contract between the Government and the FDOT and subsequent coordination that took place during formulation efforts for Increment 2. Under the Increment 2 Field Test, the L-29 Canal inflow structures (S-333, S-355A/B, and S-356) will be operated with the intention of limiting event durations with L-29 Canal stages above 8.5 feet, NGVD to a target maximum duration of 72 hours. For each water year (May through April), the L-29 Canal inflow structures will be managed to limit the cumulative duration of L-29 Canal stages above 8.3 feet, NGVD to a maximum of 90 days, and the conditions of the Tamiami Trail roadway sub-base and roadway will be continuously monitored. Continued L-29 structure inflows which result in cumulative durations with L-29 Canal stages above 8.3 feet, NGVD for longer than 90 days will require written approval from the FDOT, given evaluation of the monitoring data by FDOT.

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		A separate alternative (Alternative C) that excludes operational constraints identified for the L-29 Canal (*i.e.* limited duration of L-29 Canal stages near 8.5 feet, NGVD to a maximum period of 90 days) was carried forward through the environmental effects analysis in the instance that written approval from FDOT is provided and L-29 Canal constraints are able to be removed for 8.5 SMA flood mitigation during implementation of Increment 2. It is the intent of the Corps to incorporate lessons learned from the above mentioned monitoring data under implementation of Increment 2 and/or new information from future hydrologic modeling conducted during plan formulation efforts for COP to inform potential operational constraints on the maximum stage operating limit in the L-29 Canal. This information is needed to conclusively demonstrate the capability of the completed MWD Project components (including S-357N) to maintain flood mitigation requirements for 8.5 SMA under the raised L-29 Canal maximum operating limit of up to 8.5 feet, NGVD.
SOUTH FLORIDA WATER MANAGEMENT DISTRICT (SFWMD)		
Comment Date: October 20, 2017		
SFWMD - 1	The Jacksonville District, U.S. Army Corps of Engineers (USACE) issued the subject Scoping Notice to gather comments and concerns that will be addressed in a National Environmental Policy Act (NEPA) document for the Combined Operational Plan (COP). The purpose of COP is to define operations for constructed components of the Modified Water Deliveries (MWD) to Everglades National Park (ENP) and the Canal 111 (C-111) South Dade projects, while maintaining the Congressionally-authorized multiple purposes of the Central and Southern (C&SF) Project to include flood control; water supply for agricultural irrigation, municipalities, and industry; regional ground water control and prevention of saltwater intrusion; enhancement of fish and wildlife; and recreation. A bulleted list of objectives outlined by the USACE for COP includes the following: 1. Improve water deliveries (timing, location, volume) into ENP and take steps to restore natural hydrologic conditions in ENP given current C&SF infrastructure or infrastructure expected to be completed by the time of implementation, to the extent practicable by: a. Changing schedule of water deliveries so that it fluctuates in consonance with local meteorological conditions, including providing for long term and annual variation in ecosystem conditions in the Everglades (Timing). b. Restoring NESRS as a functioning component of the Everglades hydrologic system (Location). c. Adjusting the magnitude of water discharged to ENP to minimize effects of too much or too little water (Volume). 2. Maximize progress toward restoring historic hydrologic conditions in the Taylor Slough, Rocky Glades, & eastern Panhandle of ENP.	Thank you for your comment. Please see response to comment FDEP-1 with regard to the current bulleted list of objectives outlined by the Corps for COP. This list has been subsequently updated to be consistent with language previously stated in the authorizing documents for the MWD and C-111 South Dade Projects.

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	3. Protect the intrinsic ecological values associated with WCA 3A and ENP. 4. Minimize the damaging freshwater flows to Manatee Bay/Barnes Sound through the S197 structure and increase flows through Taylor slough and coastal creeks. 5. Include consideration of cultural values and tribal interests and concerns within WCA 3A and ENP. 6. Explore opportunities for enhancing the recovery of federally and state listed species under the Endangered Species Act, consistent with the restoration objectives, the USACE's authorities for MWD and C-111 projects and operational considerations. 7. Explore objectives to enhance opportunity for flood control and mitigation. The South Florida Water Management District (District) appreciates the opportunity to comment, and understands that the substantive details of the operating plan will be addressed in the forthcoming NEPA document.	
SFWMD - 2	The pre-storm QPF criteria in the FDOT agreement with the USACE specifies stage limits in the L-29 Canal which reduces flows to NESRS. New groundwater wells and soil moisture sensors will be installed soon to understand the effects of water in the L-29 Canal to the Tamiami Trail Subbase. Analysis of monitoring data will support revision of the FDOT-USACE agreement. The revised USACE-FDOT agreement needs to have clear and actionable criteria to operate the L-29 Canal. In addition, the resulting changes to the water control plan need to balance the goal of conveying water from WCA 3A to ENP and ensuring the South Dade Conveyance System can continue to provide flood protection to privately owned land in the L-31N and C-111 Basins.	Please see response to FWC-5 above. It is the intent of the Corps to incorporate lessons learned from monitoring data conducted under implementation of Increment 2 and/or new information from future hydrologic modeling conducted during plan formulation efforts for COP to inform potential operational constraints on the maximum stage operating limit in the L-29 Canal. This information is needed to conclusively demonstrate the capability of the completed MWD Project components (including S-357N) to maintain flood mitigation requirements for 8.5 SMA under the raised L-29 Canal maximum operating limit of up to 8.5 feet, NGVD. Following installation of the new groundwater wells and evaluation of the data, the Corps will coordinate with FDOT to update the requirements of the Relocation Agreement, if supported by the data. The project team is currently in the initial stages of planning and has identified planning objectives and constraints. Planning objectives describe what the project is intended to accomplish. A constraint is a restriction that limits the extent of the planning process. Alternative plans will be formulated to meet project objectives while avoiding violations of project constraints. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP while maintaining the authorized purposes of the C&SF Project to include the MWD Project, C-111 South Dade Project and CERP. Planning constraints have been identified to include, but are not limited to, maintaining the level of flood damage reduction associated with the 1994 C-111 GRR Recommended Plan and maintaining required flood mitigation for 8.5 SMA.
SFWMD - 3	COP is the opportunity to eliminate Column 2 operations. Column 2 operations were an interim solution developed during IOP prior to construction of the detention areas and are archaic. Instead of Column 2, the District's South Dade Study recommended seasonal operations for the S-332B and S-332C pump stations identifying a range to maintain the L-31N Canal and allow the transition from the dry to wet season and from wet to dry season conditions. The seasonal operations were shown to be beneficial to prolonging hydroperiods during the dry season in the ENP and support agricultural production which begins at the end of the wet season. The	Concur that the intent in COP is to eliminate Column 2 operations. With each incremental testing operational strategy, the Corps has made systematic adjustments that allow for the reduction of Column 2 flows as additional construction features have been brought online. During the development of COP, the Corps will continue to incorporate new operational strategies to achieve the project goals of delivering more water to NESRS while maintaining an adequate level of flood mitigation for the adjacent 8.5 SMA properties. COP will consider and evaluate alternatives which eliminate Column 2 operations and WCA 3 A high water discharges into the South Dade Conveyance System (SDCS). The COP selected plan will be the alternative which best achieves the project objectives while adhering to the project constraints. Refer also to the response to FDACS-2.

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	District is very interested in including seasonal operations in the alternative development. These are a valid and proven operating strategy to replace Column 2 operations.	
SFWMD - 4	There is a need to evaluate COP on a broader and more comprehensive scale while meeting the original objectives of both the MWD and C-111 South Dade Projects. COP alternative evaluation should consider ongoing and future State and Federal restoration efforts. The broader more comprehensive evaluation should include re-evaluating inflows and outflows of WCA 3 and features that have been or will be constructed by Federal and State agencies such as the Tamiami Trail Next Steps Phase I project, Old Tamiami Trail Removal, S333N, Biscayne Bay Coastal Wetlands. The evaluation should include components for the South Dade C&SF flood protection, conditions in Water Conservation Areas (WCA) 1, 2 and 3, and flood mitigation for the 8.5 Square Mile Area (SMA), L-31N and C-111 Basins. Current regulation schedules for WCA 1 and WCA 2A have known shortcomings resulting in documented impacts to the observed system and shown in planning studies over the last several years. In WCA 1, a range of hydrologic stage conditions are needed to sustain a healthy landscape, but prolonged high water conditions risk transport of higher nutrient and high hardness water into the marsh interior, which would otherwise optimally remain a low-nutrient, soft water environment. In WCA-2A significant loss of habitats including a 90% reduction in the aerial extent of tree islands, a loss of ridge and slough microtopography, and a lack of good foraging and breeding habitat for wading birds have been observed. Since WCA 1 and WCA 2A are centrally located in the South Florida water management system, a number of upstream and downstream considerations should also be made. In both cases, upstream projects including the District's Restoration Strategies program will result in changed inflow timing relative to those assumed when the current WCA regulation schedules were developed. Additionally, the regulatory decisions associated with WCA-1 and WCA-2A will directly influence the ability for downstream systems (WCA 3A or WCA-3B) to achieve desired outcomes. For example, attempts in the last several years to meet the current WCA-2A regulation schedule have produced large dry season reversals downstream in WCA-3A during critical periods in the wading bird breeding season.	COP WCA-3A Regulation Schedule updates will be developed based on existing inflows from WCA-1 and WCA-2A; with limited data available for cultural resources within WCA 1 and WCA 2A and requirements for Tribal consultation, updates to the regulation schedules cannot be completed within the 2016 B.O. timeline for COP. Regulation schedule changes for WCA-1 and WCA-2 will not be included in the COP, however, COP modeling will include sensitivity runs in order to ensure sufficient flexibility is included in the COP Water Control Plan to accommodate a future WCA-1 and WCA-2A Regulation Schedule study.
SFWMD - 5	One goal of the authorized MWD project was to construct and operate a flood mitigation project for the 8.5 SMA to ensure that restorative flows to ENP's Shark River Slough would not result in diminished or increased flood protection. To this end, the USACE needs to ensure evaluation of 8.5 SMA mitigation features during the NEPA analysis accurately reflects future	The 1983 Base Condition identifies the level of flood mitigation for the 8.5 SMA that will be maintained in the COP process; Base 1983 represents the conditions in the 8.5 SMA before MWD was implemented, consistent with the requirements set forth in the 8.5 SMA 2000 GRR Record of Decision.

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	performance and adjustments to the COP does not compromise maximizing flows from WCA 3 to ENP. In addition, structural modifications to 8.5 SMA mitigation features should be identified and implemented if providing flood mitigation to 8.5 SMA constrains the stages or flows in NESRS. This same is true for evaluating the performance of the newly constructed C-111 South Dade features, their operation, which may not begin until 2018 wet season, and the need for potential modification of its features. To this end, the USACE needs to ensure evaluation of the C-111 detention areas during the NEPA analysis accurately reflects future performance of COP and does not compromise maximizing flows from WCA 3 to ENP.	The MWD field test increments were developed based on extensive evaluation of historical operations data, which have been detailed in the corresponding Environmental Assessment reports. The monitoring plans for surface water hydrology and groundwater hydrology for the MWD Incremental Field Tests (refer to Annex 2 of the Increment 2 Monitoring Plan Appendix C) will continue to provide data to assess performance of the 8.5 SMA project components, including S357 and S-357N (pending construction completion), to maintain the surface water and groundwater levels within the project areas of the 8.5 SMA, between the L-357W Levee and the L-31N Levee at the same levels as existed prior to the implementation of any MWD Project components. As included in the original Increment 1 Operational Strategy, Increment 1.1/1.2 and Increment 2 will also implement a testing protocol to assist in defining operating criteria for the new 8.5 SMA S-357N water control structure following completion of construction (currently anticipated in February 2018). The COP will establish an operational plan for the completed infrastructure of the MWD and C-111 South Dade projects. If supported by the project schedule, evaluation of structural modifications within 8.5 SMA may also be conducted concurrent with development of the COP; these evaluations may be supported by hydrologic modeling conducted by the ENP and SFWMD, independent of the COP process.
SFWMD - 6	The District recommends that COP includes operations responsive to unforeseen meteorological conditions to avoid, minimize or eliminate the need State issued Emergency Orders for High Water Conditions. This will reduce the frequency of high water emergency orders and subsequent operation adjustments not covered in the water control manual.	Operational flexibility was included within the November 2017 Increment 2 EA and Proposed FONSI to allow for a rapid response to extreme high water levels in WCA 3A as a result of the numerous emergency and planned temporary deviations conducted in 2016 and 2017. It is the intent of the Corps to include operational flexibility as appropriate during plan formulation efforts for COP to prevent the need for expedited and/or emergency actions in the future.
SFWMD - 7	It in the interest of the District and FDEP to ensure operations are in place to achieve the objectives of the CERP projects. The CERP Biscayne Bay Coastal Wetlands Project - Phase 1 is nearly complete and planning for Phase 2 will begin soon. This is the opportune time to consider directing flows to enhance salinities in Biscayne Bay. Although the coastal water control structures are not part of this water control plan, the divide structures are included.	Potential environmental effects to Biscayne Bay will be evaluated within the NEPA document as this area is adjacent to those structures considered under COP. COP will define operations for the completed features of the MWD and C-111 South Dade Projects, and as stated does not include the coastal water control structures associated with the Biscayne Bay Coastal Wetlands Project. Opportunities to adjust operations in the SDCS to enable additional flows to Biscayne Bay during the dry season may be explored if compatible with the identified project objectives and constraints, as previously considered with the 2015-2016 SFWMD South Dade Investigation and the Increment 1.1 and 1.2 field test.
PUBLIC (ENVIRONMENTAL STAKEHOLDERS AND PRIVATE CITIZENS)		
REEF ENVIRONMENTAL EDUCATION FOUNDATION (REEF)		
Comment Date: October 11, 2017		
LAD ATKINS (REEF) - 1	The lifestyle and economy of the Florida Keys are intrinsically linked to the health of the Everglades National Park and Florida Bay. Clean water to sustain the ecosystem is key. Restoration projects to benefit Everglades National Park and the Florida Keys have been under construction for many years, paid for by significant taxpayer investment. Now, writing an operations plan for how to use these projects is the critical next step. This is the time to achieve the ecosystem benefits we desperately need in the Keys.	Thank you for your comment. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated January 2020 following completion of the necessary NEPA documentation including the Final EIS and ROD.

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	Please ensure that protecting the waters of the Southern Everglades and Florida Bay is the top priority for operating restoration projects in South Miami-Dade! These projects include the Modified Water Deliveries (MWD), C-111 South Dade, and C-111 Spreader Canal projects, which will be guided by the Combined Operation Plan (COP) currently under construction by the U.S. Army Corps of Engineers and other state and federal agencies. As a member of the Florida Keys community, responsible operation of these projects to maximize restoration benefits for the Everglades and Florida Bay is important to me.	
NATIONAL PARKS CONSERVATION ASSOCIATION (NPCA)		
Comment Date: October 20, 2017		
NPCA - 1	The National Parks Conservation Association (NPCA) has long supported efforts to restore Everglades National Park (ENP) and Florida Bay. We have remained actively involved in the planning processes for Modified Water Deliveries (MWD) to ENP, C-111 Spreader Canal, and the C-111 South Dade Project. After decades of work, it is finally time to flip the "on" switch and operate these plans to the maximum benefit of the ecosystem. Executing the Combined Operations Plan (COP) will bring restoration planning into on-the-ground reality. NPCA asserts that the COP must utilize restoration infrastructure to the maximum ecological benefit of Everglades National Park and Florida Bay. As the scoping of COP moves forward, we urge the agencies to ensure that the charter mission of ecosystem restoration remain the primary focus and goal of your cumulative efforts.	Thank you for your comment. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated in January 2020 following completion of the necessary NEPA documentation including the Final EIS and ROD.
NPCA - 2	Specifically, the COP must ensure that key operational targets outlined in the original project documents are met, including: eliminated use of the S-197 structure and associated harmful discharges, increased canal stages of the C-111 at S-18C, and increased water to restoration levels in ENP and Florida Bay. COP must also set the stage for additional restoration benefits to come with projects that are currently in the works. These include construction of the Central Everglades Plan (CEPP), particularly CEPP South components, additional bridging of Tamiami Trail, and the Everglades Agricultural Area (EAA) Reservoir. Together, these projects will create a network of restoration infrastructure for ENP and Florida Bay. The U.S. Department of the Interior has invested millions of taxpayer dollars for the direct benefits to ENP that must now be achieved. ENP is the anchor of the federal interest in the South Dade system. We must get the water right	A stated goal of the 1994 C-111 South Dade GRR and EIS includes the reduction of damaging freshwater discharges to Manatee Bay and Barnes Sound while maintaining flood protection to agricultural lands east of the C-111 Canal. Goals also include the extension of hydroperiods within the ENP Eastern Panhandle, and the promotion of additional overland flows across the ENP Eastern Panhandle towards northeast Florida Bay. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP by defining operations for the completed components of the MWD and C-111 South Dade Projects. Implementation of the MWD operational field tests (*i.e.* Increment 1, 1.1, 1.2 and 2) included operational criteria that increased the potential for additional low volume releases at S-197. This additional operational flexibility was included within the MWD operational field tests due to uncertainty resulting from increased stages in NESRS and the potential for increased seepage to the L-31N Canal south of S-331. It is the intent of the Corps to re-evaluate operational criteria previously defined for this structure during COP. The SFWMD has implemented features of the C-111 Spreader Canal Western Project under the State Expedited Construction program (i.e. Accelerate Everglades Restoration Project [Acceler8]) for the purpose of expediting design and construction of

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	and make good on the investment that has been funded by Americans for the national park that is owned and valued by all.	a number of critical restoration projects consistent with the CERP. A Department of Army permit (SAJ-2005-9856 [IP-AAZ]) was issued to the SFWMD on October 14, 2009 for the construction and operation of the project. Initial construction of the C-111 Spreader Canal Western Project was completed in January 2012 with completion of the Frog Pond Detention Area, partial Aerojet Canal features, plugs in the C-110 Canal, and a plug at S-20A. Construction of the remaining two southern weirs along the Aerojet Canal began in November 2014 and was completed in early 2015. Construction of a new water control structure in the lower C-111 Canal (i.e. S-198, which would be located south of S-18C) and incremental increases in the open/close stage triggers at S-18C have not yet been implemented. The SFWMD initiated operation of the C-111 Spreader Canal Western Project constructed components in June 2012, in accordance with the Project Operating Manual (POM) developed with the PIR. At the request of SFWMD, a revised POM was approved in June 2016. Steps will be taken in the future to incorporate the project into the federally authorized C&SF Project once the project's consistency with the 2014 WRRDA authorized project has been documented and approved by the Corps, and a Project Partnership Agreement (PPA) between the Corps and SFWMD has been executed. Pending execution of the PPA, operation of the C-111 Spreader Canal Western Project is not included as part of the 2012 WCAs, ENP, and ENP to SDCS Water Control Plan (hereafter referred to as the 2012 Water Control Plan) (USACE 2012c) or within the scope of COP. The SFWMD will continue to operate their expedited C-111 Spreader Canal Western Project. Consistent with the requirements of the February 2017 re-issued C-111 Spreader Canal regulatory permit from the Corps, the SFWMD is continuing to assess south Miami-Dade water conditions and existing operations, including those of the C-111 Spreader Canal Project, on a quarterly basis for a minimum of five years to ensure project features are constructed and operated not to adversely affect adjacent lands outside and within the C-111 Spreader Canal Western Project boundary with regards to water quantity, water quality, and/or flooding. The purpose of the assessment and quarterly reports are to ensure the SFWMD has the best available information to determine what operational system changes, if any, are necessary to avoid adverse water levels on adjacent lands. It is presently anticipated that additional information generated from the ongoing SFWMD monitoring within the C-111 Spreader Canal Western Project area will be considered during development of the COP.
Bonefish & Tarpon Trust		
Comment Date: October 20, 2017		
ROSS BOUCEK (BTT) - 1	My name is Ross Boucek, Florida Keys Initiative Manager of the Bonefish & Tarpon Trust (BTT), and I am submitting this letter on behalf of BTT. BTT appreciates the opportunity to provide our perspective on Everglades restoration, particularly in terms of how we will operate projects in the Southern Everglades. Restoration projects to improve the conditions of the Southern Everglades and Florida Bay, including Modified Waters Deliveries (ModWaters), C-111 South Dade, and C- 111 Spreader Canal, have been in the works for decades. Now it is finally time to turn these projects on, executing the Combined Operations Plan (COP), and maximize the ecological benefits they provide to Everglades National Park and Florida Bay. BTT is a 20 year old science-based conservation organization that is focused on improving management of coastal fisheries and the habitats upon which the fisheries depend. Though our focus is on the fish species that comprise the flats fishery – Bonefish, Tarpon, Permit, and even Snook – our science and conservation work also applies to other coastal species and fisheries.	A stated goal of the 1994 C-111 South Dade GRR and EIS includes the reduction of damaging freshwater discharges to Manatee Bay and Barnes Sound while maintaining flood protection to agricultural lands east of the C-111 Canal. Goals also include the extension of hydroperiods within the ENP Eastern Panhandle, and the promotion of additional overland flows across the ENP Eastern Panhandle towards northeast Florida Bay. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP by defining operations for the completed components of the MWD and C-111 South Dade Projects. The project team is currently in the initial stages of planning. The project team will utilize performance measures (*i.e.* depth, distribution, duration of surface flooding etc.) to evaluate alternative plans with regard to potential effects to fish and wildlife resources within WCA 3, ENP and Florida Bay. At this time, a performance measure has been previously developed for Florida Bay that evaluates potential changes in salinity as a result of stage in the upstream marsh. In addition, the project team has initially identified the desire to utilize other available tools to evaluate potential environmental effects to Florida Bay including the use of a suitability model for seagrass and spotted juvenile sea trout. These tools as well as output from the regional hydrologic modeling will be used in the alternative effects evaluation in documenting potential effects on Florida Bay. The Corps concurs that changes in the quantity, quality, timing, and distribution of freshwater flows is essential to restoration of

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	Indeed, we regularly collaborate with state and federal resource management agencies, sharing our data to help improve management. We are also an angler-based organization in that we engage and represent the tens of thousands of people who participate in and rely upon the recreational fisheries for their livelihood. The epicenter of the failure to enact Everglades restoration is Florida Bay. Florida Bay's ongoing collapse arises from failure to deliver adequate quantities of clean freshwater to the Bay via the Everglades in the appropriate locations at appropriate times. It is bitterly ironic that a similar crisis in the Bay – 30 years ago – provided much of the impetus for federal and state restoration authorization in 1988 (the East Everglades Act) and later in 2000 with the Comprehensive Everglades Restoration Plan (CERP). Despite years of study and planning, and expenditure of millions of dollars of public funds, Florida Bay is likely worse today than in 1985. This state of affairs is unacceptable and BTT urges you to develop a COP that accelerates actions to restore the Bay before it passes an ecological tipping point from which it may never recover. We are concerned that Everglades restoration inadequately considers coastal fish and habitats in water management plans. Too often, water budgets are presented as annual totals and reduction in nutrients. From a fish and habitat perspective, changes in the timing, amount, and location of freshwater flows are just as important as reduction in nutrient load. Indeed, even if pristine freshwater was being discharged from Lake Okeechobee into the rivers, the ecological damage would be same. In other words, restoration must aim to restore the spatial and temporal patterns of freshwater flows into South Florida estuaries as well as address the nutrient load issues. Our comments are also presented from multiple perspectives. In the 1980's BTT's Vice Chairman, Bill Horn, served as Assistant Secretary of the Interior for Fish, Wildlife and Parks and was engaged in negotiations to provide more timely water flows to the Bay via Taylor Slough as well as the work that produced the Modified Water Deliveries authorization in 1988. In 2007-2010 our Vice Chairman had the honor of serving two terms on the Committee on Independent Scientific Review of Everglades Restoration Progress, contributing to the 2008 and 2010 Biennial Review reports. And for 40 years, Bill has avidly fished the Florida Keys and Florida Bay in pursuit of bonefish and tarpon. It is extremely frustrating that 30 years after we learned of the need for better water management in South Florida, it still hasn't occurred at a scale sufficient to keep Florida Bay, the Caloosahatchee River, and the St. Lucie River healthy let alone restored. As anglers, policy makers and	the south Florida ecosystem, including Florida Bay and is committed to implementing COP in order to continue progress in Everglades restoration. The Corps intends to pursue an open and public process during COP planning efforts, engaging Members of the public will be able to attend regularly scheduled PDT team meetings and continue to provide public comment through that forum. Public meetings are also anticipated to be held prior to release of the Draft EIS. Information on the project to include announcement for PDT meetings can be obtained from the following website: http://www.saj.usace.army.mil/Missions/Environmental/Ecosystem-Restoration/G-3273-and-S-356-Pump-Station-Field-Test/

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	scientists, it has been devastating to watch fisheries collapse when all knowledgeable observers know what needs to be done to restore water quality in the Bay. Florida Bay was once home to a robust bonefish fishery. Bonefish is a highly prized sport fish which is stalked in clear shallow waters, and released unharmed after an exciting catch. Following the Bay's mid-80's crisis, the bonefish population began to slide, the decline accelerating in 1999. The population hasn't recovered. Tarpon and Snook have also suffered from the lack of Everglades restoration. These species rely upon the entire habitat mosaic of South Florida – from backwater mangrove swamps to mangrove shorelines, seagrass beds, and sandy beaches. This demonstrates how Florida Bay's ecological decline has impacted Tarpon, also a catch and release species. From Cape Sable and Flamingo south to Rabbit Key Basin and Buchanan Bank, big migratory Tarpon (Megalops Atlanticus) filter into the Bay every spring as part of the spawning run to the Atlantic waters off the Keys. Anglers and guides pursue the silver kings and routinely catch fish topping 100 pounds on fly rods. After the problems of the mid-80's, tarpon largely abandoned the Sandy Key Basin, which was a historic hot spot for the big silver fish, and similar abandonment is occurring in other locations. Inland, the tarpon use heavily Whitewater Bay and the Shark River complex. These Everglades waters host the full spectrum of Megalops Atlanticus from one pound juveniles to 150 pound matriarchs. Long term changes in water flows and salinity levels in these waters could put at risk the greatest remaining juvenile tarpon habitat in all of Florida. As you might guess from our descriptions, the flats fishery is economically important. In the Florida Keys, the flats fishery has an annual economic impact of $465 million. The flats fishery is the major component of the recreational fishery in the Everglades region, which is worth nearly $1 billion annually. Restoration is essential to bringing these fish populations back to their historic levels. It is widely recognized that failure to significantly increase freshwater flows to the Bay via Shark River and Taylor Slough is the primary cause of the Florida Bay crisis. The lack of water coming through the entire Everglades system creates hyper saline conditions that are death to a variety of important seagrasses. Large scale die offs of these grasses release excessive nutrients spurring algal blooms turning usually clear waters a sick pea soup green. Increased turbidity kills more grass, releasing more nutrients creating a death spiral. Vast swaths of previously healthy seagrass beds are now	

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	barren reaches of mud and silt, and recent observations show that these barren bottoms are eroding in some locations. Demise of the grass kills the benthic organisms that live their depriving forage fish of their food source. The loss of the forage fish causes the predatory game fish to leave too. It is an ecological and economic calamity. The COP must utilize restoration infrastructure to maximize ecological benefits to Everglades National Park and Florida Bay. As the scoping of COP continues, we urge the agencies to ensure that the founding mission of ecosystem restoration is the primary focus and goal of your efforts. We also ask that members of the Florida Keys community, who will be directly impacted by the potential impacts of these projects and the benefits they provide to Florida Bay, be fully engaged in the COP planning process.	
EVERGLADES COALITION (EC)		
Comment Date: October 20, 2017		
MARK PERRY & MICHAEL J. BALDWIN (EC) - 1	On behalf of its 61 member organizations committed to the protection and restoration of America's Everglades, the Everglades Coalition submits these comments on the scoping assessment for the Combined Operational Plan (COP), to define operations for the constructed features of the Modified Water Deliveries (MWD) to Everglades National Park (ENP), C-111 Spreader Canal, and C-111 South Dade Projects. We understand that the COP will result in a comprehensive, integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 projects. The Everglades Coalition and its member organizations have long advocated for the planning, funding, and construction of these critical projects to advance ecological restoration of the Southern Everglades and Florida Bay. MWD is a project initiated and funded by the National Park Service with the primary intention to benefit ENP, with ancillary goals for South Dade agriculture. The C-111 Spreader Canal and South Dade Projects seek to further correct the damage inflicted to Florida Bay and ENP by the C&SF Flood Control Project by reestablishing the hydrologic flow between Taylor Slough and Shark River Slough. Just like MDW, these projects keep the water in the natural areas and away from South Dade. We appreciate the work by state and federal agencies that has resulted in the restoration infrastructure that is on the ground today and look forward to remaining engaged stakeholders through the COP planning process. Finalizing the COP will be the realization of decades of work and millions of dollars in taxpayer investment by the American people to benefit Everglades	A stated goal of the 1994 C-111 South Dade GRR and EIS includes the reduction of damaging freshwater discharges to Manatee Bay and Barnes Sound while maintaining flood protection to agricultural lands east of the C-111 Canal. Goals also include the extension of hydroperiods within the ENP Eastern Panhandle, and the promotion of additional overland flows across the ENP Eastern Panhandle towards northeast Florida Bay. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP by defining operations for the completed components of the MWD and C-111 South Dade Projects. Implementation of the MWD operational field tests (*i.e.* Increment 1, 1.1, 1.2 and 2) included operational criteria that increased the potential for additional low volume releases at S-197. This additional operational flexibility was included within the MWD operational field tests due to uncertainty resulting from increased stages in NESRS and the potential for increased seepage to the L-31N Canal south of S-331. It is the intent of the Corps to re-evaluate operational criteria previously defined for this structure during COP. The SFWMD has implemented features of the C-111 Spreader Canal Western Project under the State Expedited Construction program (i.e. Accelerate Everglades Restoration Project [Acceler8]) for the purpose of expediting design and construction of a number of critical restoration projects consistent with the CERP. A Department of Army permit (SAJ-2005-9856 [IP-AAZ]) was issued to the SFWMD on October 14, 2009 for the construction and operation of the project. Initial construction of the C-111 Spreader Canal Western Project was completed in January 2012 with completion of the Frog Pond Detention Area, partial Aerojet Canal features, plugs in the C-110 Canal, and a plug at S-20A. Construction of the remaining two southern weirs along the Aerojet Canal began in November 2014 and was completed in early 2015. Construction of a new water control structure in the lower C-111 Canal (i.e. S-198, which would be located south of S-18C) and incremental increases in the open/close stage triggers at S-18C have not yet been implemented. The SFWMD initiated operation of the C-111 Spreader Canal Western Project constructed components in June 2012, in accordance with the Project Operating Manual (POM) developed with the PIR. At the request of SFWMD, a revised POM was approved in June 2016. Steps will be taken in the future to incorporate the project into the federally authorized C&SF Project once the project's consistency with the 2014 WRRDA authorized project has been documented and approved by the Corps, and a Project Partnership Agreement (PPA) between the Corps and SFWMD has been executed. Pending execution of the PPA, operation of the C-111 Spreader Canal

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	National Park and Florida Bay. As such, maximizing ecological benefits to the Southern Everglades must be the primary focus of the COP. Specifically, the final plan should: 1. Eliminate the use of the S-197, as identified in the project documents. 2. Increase the canal stages of the C-111 at S-18C, as stated in the project documents. 3. Achieve restoration of water levels in ENP and Florida Bay, as stated in project documents. 4. Set the stage for more water deliveries to ENP and Florida Bay in anticipation of the Central Everglades Plan (CEPP), as planned in CERP. 5. Work to reduce harmful discharges to Barnes Sound and Manatee Bay. With a completed network of restoration and flood control infrastructure in place, the COP can outline a plan to move away from damaging emergency operations that continue to harm the Greater Everglades ecosystem. Instead, we can rely on the restoration infrastructure that has long been planned to move water in a way that is both beneficial to the natural system and protective of stakeholders in Miami-Dade County. We look forward to remaining engaged through the COP planning process and appreciate the opportunity to provide comments on the scope of this effort. Thank you for your consideration.	Western Project is not included as part of the 2012 WCAs, ENP, and ENP to SDCS Water Control Plan (hereafter referred to as the 2012 Water Control Plan) (USACE 2012c) or within the scope of COP. The SFWMD will continue to operate their expedited C-111 Spreader Canal Western Project. Consistent with the requirements of the February 2017 re-issued C-111 Spreader Canal regulatory permit from the Corps, the SFWMD is continuing to assess south Miami-Dade water conditions and existing operations, including those of the C-111 Spreader Canal Project, on a quarterly basis for a minimum of five years to ensure project features are constructed and operated not to adversely affect adjacent lands outside and within the C-111 Spreader Canal Western Project boundary with regards to water quantity, water quality, and/or flooding. The purpose of the assessment and quarterly reports are to ensure the SFWMD has the best available information to determine what operational system changes, if any, are necessary to avoid adverse water levels on adjacent lands. It is presently anticipated that additional information generated from the ongoing SFWMD monitoring within the C-111 Spreader Canal Western Project area will be considered during development of the COP.
LAKE WORTH WATERKEEPER (LWWK)		
Comment Date: October 21, 2017		
REINALDO DIAZ, J.D. (LWWK) - 1	We write in response to the public comment request regarding the COP for the MWD and C-111 SD Projects. Simply stated: Everglades' restoration is a concern for the entire state. A healthy Everglades has long reaching effects felt throughout its surrounding areas. Our health, lifestyle, and tourism industry all benefit from a healthy Everglades. Tourism is clearly a major driver of our GDP. In 2014, over 97 million people visited our state bringing $82 billion with them (1). $4.9 billion was collected as sales tax. *Id*. 1,145,800 Floridians were employed in the tourism industry. *Id*. Here in Palm Beach County, tourism is among our major industries bringing in $7 billion and supporting 60,000 plus tourism related jobs(2). And it's no secret that the vast majority of these tourists come here for our beaches. Despite this, it seems that decisions are being made with little to no consideration for our community's dependence on this industry. Through the	Thank you for your comment. The Corps recognizes that tourism is a major driver to the Florida economy and HAB events are not desirable for tourism. The estuaries/beaches major source of nutrients and fresh water is from local runoff over the long term. Lake Okeechobee, while contributing a portion of the nutrient loading to the estuaries, has one of the lowest average nutrient concentration averages for the sources to the estuaries. The Corps agrees that reducing nutrient loading and freshwater pulses (which Lake Okeechobee contributes to) to the estuaries would help reduce HAB potential and works closely with the State and local government agencies to best manage the system under current constraints. Having a greater storage capacity for fresh water storage throughout the system will give the water managers more options to better manage high freshwater discharges to the estuaries from Lake Okeechobee. One of the main items needed is greater storage capacity, which is expected to improve as many projects come on like. High continuous freshwater discharges to the estuaries from all sources increase risk of HAB events. Extreme rainfall events leave few options if all storage areas are full as happened during the 2017 and 2016 WY. Recent study conducted by Martin County involved sampling for conservative tracers, within the St Lucie estuary, associated with sanity waste (i.e. septic tanks) during suspension of Lake O flows to the estuary. It was determined that the conservative tracers associated with sanitary wastes came from local runoff not Lake Okeechobee.

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	Water Resource Development Act (WRDA) of 2000's *savings clause* big agriculture (predominantly big sugar) is given the highest priority in water management (3). Water contaminated with bacteria, and harmful algae promoting nutrients is pumped into Lake Okeechobee to protect the massive monoculture farms. But eventually, this water moves through our community and reaches our beaches. Bringing unsightly dark brown and dirty water that turns tourists off of our beaches, prevents them from scuba diving our reefs, or ruins their fishing day. • 1 VISIT FLORIDA: TOURISM FAST FACTS, https://www.visitflorida.org/about-us/what-we-do/tourism-fast-facts/ (last visited Oct. 20, 2017). • 2 PBC TOURIST DEVELOPMENT COUNCIL: ABOUT US, http://discover.pbcgov.org/touristdevelopment/Pages/default.aspx (last visited Oct. 20, 2017). • 3 Water Resources Development Act of 2000 Section 601(h) (5) Savings Clause. Our water is a way of life. Much like how agriculture is engrained into the culture of the interior communities: boating, diving, fishing, surfing, etc. defines the culture of the coastal communities. This is the lifestyle that we like to share with tourists. But it is severely compromised by dirty water. Our health is impacted when exposed to the bacteria and harmful algae brought by this dirty water. Many of the contaminants associated with farm runoff have been linked to degenerative diseases and even death. For example, cyanobacteria thrives on the nutrients in the water that is pumped into Lake Okeechobee. When its overabundance reaches a bloom, cyanobacteria kills wildlife, most notoriously with massive fish kills. In addition, cyanobacteria produce a number of cyanotoxins, leading to serious immediate health concerns that require water closures. Cyanobacteria can also produce beta-Methylamino-L-alanine (BMAA), a substance that is a suspected causal link to a number of serious neurodegenerative diseases including Alzheimer's, Armyotrophic Lateral Sclerosis (ALS), and Parkinson's disease(4). This is hardly the environment we want to sell to our community. Residents and tourists alike come here for clean, clear beaches. So we are asking the USACE to consider our needs in this water management plan. Let us be clear, this is by no means an attack on the interior communities surrounding Lake Okeechobee that depend on the agriculture industry. Rather, we are asking to have the coastal community's needs considered fairly and balanced with the needs of the agricultural community.	The Corps is working closing with State and Federal Agencies to find better coping strategies to minimize HAB risk. While the Corps is concerned with water quality issues, it does not have the authority to control or reduce nutrient inputs to Lake Okeechobee or nutrient discharges from local runoff.

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	If the priority that is given to big agriculture is a matter of current convoluted policy, then we need to have a dialogue to begin the change of this policy. There is no reason to maintain the status quo if it does not benefit the state's interest. For too long big agriculture has been given top priority in water management at the expense of the surrounding communities. A balance needs to be found, to safeguard our health, lifestyle, and industry.	
FLORIDA KEYS FISHING GUIDES ASSOCIATION INC. (FKFG)		
Comment Date: October 17, 2017		
CAPT. STEVE FRIEDMAN, COMMODOR (FKFG) - 1	Everglades National Park and Florida Bay are incredible environmental and economic resources for those of us who live and work in the beautiful Florida Keys. For years, the health of the Southern Everglades and Florida Bay have been in decline, impacting the coral reef ecosystems and fish populations that sustain our fishing, diving, and other water based businesses – the backbone of Monroe County's $2.7 billion tourism economy. Restoration projects to improve the conditions of the Southern Everglades and Florida Bay have been planned for decades. Now, the Combined Operational Plan (COP) will see guidelines for how the agencies operate the projects that will restore Everglades National Park, including the Modified Water Deliveries (MWD), C-111 South Dade, and C-111 Spreader Canal projects. We understand that the Army Corps and its partner agencies are accepting public comment on the scope of this operations plan. As fishing guides and members of the Florida Keys community, we strongly assert that restoration projects must maximize ecological benefits to Everglades National Park and Florida Bay. We live and work in the heart of the ecosystem and understand firsthand the damage that has been done. Our fisheries, wildlife and important habitats continue to be plagued by lack of freshwater flow. The hyper-salinity events and seagrass die-offs are too much for this ecosystem to handle. We must give it a chance to come back. Now is the time to complete these projects. Florida Bay desperately needs more freshwater. Americans have invested millions of taxpayer dollars in projects to restore Evergaldes National Park, which is a unique piece of our national heritage that we all own and treasure. We must ensure that all restoration infrastructure is used to protect and restore the Everglades.	Thank you for your comment. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated in 2019 following completion of the necessary NEPA documentation including the Final EIS and ROD. Please refer to comment BTT-1 for information related to potential tools the Corps will utilize to evaluate potential effects to Florida Bay. The Corps concurs that changes in the quantity, quality, timing, and distribution of freshwater flows is essential to restoration of the south Florida ecosystem, including Florida Bay.
PRIVATE CITIZENS		
Comment Date: October 19, 2017		
BRIAN O'NEILL - 1	Please stop killing the Estuaries for price supported sugar now. This may in fact end up being a huge RICO case. The Corps of Engineers has an ethical responsibility to RESTORE the River or Grass as expressed by Amendment 1!	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project

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		that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
Comment Date: October 19, 2017		
DONNA J. LUCAS - 1	The Everglades itself is at the very least as important as the people living in south Florida on borrowed swamp. South Florida needs more land? Take it from the sea Atlantic not the fragile gulf of Florida, almost always nature will win eventually especially water. The Dutch do this excellently. The Lake Okeechobee is really artificial now with its dams and earthen mounds. Engineers can solve the pollution problem was a plan in conjunction with the sugar plantations. The sugar needs to recycle all their water. Laden with algae this could be a source of energy to resell whomever funds it. The clean water resold or for irrigation. We build sewage treatment plants everywhere recycling poo poo into drinking water should be very easy especially if the algae diverted produces energy. This is done in many places. Only clean water back south to the people and glades. The lake is excess water from hurricanes and of course now the folks populating south Florida. Over flow needs to return to the Everglades, gulf of Florida, and people of south Florida clean. Not uncleaned to the Atlantic and her shores. The Army Corps of Engineers is looking at the whole of Florida for a master plan even if plan designs specifically are bid for private firms. The least bureaucracy, EPA, everyone knows the rules, South Florida Water, South West Water, The Army Corps of Engineers, and good private firms. Corp of Engineers doing a master State plan not the details, as much as, the ideals. All the other just need to follow with design with proposals and then have the water districts offer contracts for bid. We do not need. Committee of legislators to collaborate on the designs, they are not smart enough to understand or be taught and slow any progress.	Programs are in place in the watershed that are specifically focused on water quality such as the FDEP's Basin Management Action Plans and the SFWMD's Lake Okeechobee Protection Program which serves as the overarching water quality restoration plans for the Northern Estuaries including Lake Okeechobee. The creation of storage north of Lake Okeechobee, currently being proposed under the LOWP, if authorized and appropriated, will positively affect the quality of freshwater released to the estuaries which may result in improved salinity and reduced nutrient loading to estuarine waters.

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	We have the brightest engineers in Florida, environmental and civil design, private and public. This state is already so environmentally minded. With few polluting companies. The sugar company pays corporate taxes evens out export, it has to be profitable for them too, a way for energy. Thank you for considering recycling of sugar water.	
Comment Date: October 19, 2017		
JON ROBERTSON - 1	I live in Stuart Florida and would like to see the USACE prioritize human safety by increasing the outflow capability south of the lake into the STAs and future reservoir, including removing barriers that currently restrict the capability of sending water south. In 2013, 2016 and this year the large rain events caused unnatural discharges to the east and west coasts. With a larger capacity to hold water in the lake and more storage north and south of the lake these damaging discharges would be largely decreased and increase safety for residents in the Glades, Martin county and Lee county by reducing the polluted water discharging to the coasts.	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
Comment Date: October 19, 2017		
SANDY BLAIR - 1	It is beyond my comprehension how the water system has been allowed to deteriorate to the point it is. Polluted water from Lake Okeechobee is destroying the livelihoods of commercial fisherman, fishing guides, those who depend on tourists visiting our once-but-no-longer pristine beaches and waterways. The sugar industry has contaminated the course of action for too long. It is time to stop pandering to a business whose very existence is a detriment to the health of the nation – the first thing doctors tell overweight patients… CUT OUT THE SWEETS i.e. SUGAR. There is something wrong with this picture. Just do what is necessary to protect the people and the economy of the state. SEND THE WATER SOUTH.	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the

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		lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
Comment Date: October 20, 2017		
BARBARA BRENNAN - 1	I request that the Corps prioritize the impact of discharges from Lake Okeechobee on the health and safety of residents of riverside communities, the health of Florida's waters, and the renewal of the Everglades as it plans COP.	Thank you for your comment. Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project.
Comments Date: October 20, 2017		
CHARLES WIGHTMAN - 1	Please see the antiquated rules governing the watershed of Florida and the EEA get updated to today's times and populations of people in Florida. It is time to place the top priorities of water management for the benefit and protection of the people and the natural resources of the state of Florida and not for BIG SUGAR & THE EEA.	Thank you for your comment. Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP.
Comment Date: October 20, 2017		
DOUG KILPATRICK, LOWER KEYS GUIDES ASSOCIATION - 1	The Lower Key Guides Association is comprised of over 150 members, many of whom make a living by practicing catch and release methods of fishing in and around the boundaries of Evergaldes national Park. It is our understanding that there is currently a comment period in which the Army Corps and its affiliates are accepting public comment on the COP guidelines for restoration efforts, including Modified Water Deliveries, C-111 Spreader Canal and C-111 South Dade projects. We understand too well the economic impact of reduction in fish population's ad habitat. The ongoing ecological issues in the Park, including the lack of fresh water flow and seagrass die-offs, cause economic losses to not only our membership but to the entire Florida economy. We urge you to understand the negative economic impacts we have felt recently, and look toward their solution, with an infrastructural restoration that is used to restore the ENP.	Thank you for your comment. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated in 2019 following completion of the necessary NEPA documentation including the Final EIS and ROD. Please refer to comment BTT-1 for information related to potential tools the Corps will utilize to evaluate potential effects to Florida Bay. The Corps concurs that changes in the quantity, quality, timing, and distribution of freshwater flows is essential to restoration of the south Florida ecosystem, including Florida Bay.
Comment Date: October 20, 2017		
MARK HORWEDEL - 1	I am writing in support of the COP plan. While I understand some of the limitations the Corps operates under, I am appealing to your collective conscience in helping Florida's citizens throw-off the suppression of public interests by a handful of sugar moguls and corrupt politicians who have permitted the destruction of our waterways to go unchecked for decades.	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-

COMMENTER	AGENCY/PUBLIC COMMENT	U.S. ARMY CORPS OF ENGINEERS (USACE) RESPONSE
	I own a property in Martin County which is baring the full brunt of pollution from Okeechobee runoff. It's shocking to witness the mess that has been made of the Indian River Lagoon and the St. Lucie River, not to mention the destruction in wildlife that has occurred. Please accelerate your efforts to develop solutions that will spare out waterways from continues destruction, return the flow of the water south and sacrifice the demands of special interests for the public interest. Thanks in advance for your efforts to return Florida to Floridians.	111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
Comment Date: October 20, 2017		
LISA CARRUTHERS - 1	Please prioritize Lake Okeechobee's impact on the health and safety of glades residents and riverside communities as you plan COP. The known impacts of toxic algae must take priority over industry "wants". As a health care professional, I know that the cumulative effects of exposure to these toxins will sky rocket, causing more illness and death in future years. The run off needs to be set south, as it was intended before the interference of money motivated businessmen and politicians.	Thank you for your comment. Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project.
Comment Date: October 20, 2017		
LOUIS BROUILLARD - 1	Put me down as a voice for returning as much water possible to Florida Bay, and reducing the discharges to the coastal estuaries. Ps, I do not support deep injection wells north of the lake. Frankly the sugar baron's tails have wagged the dog too long.	The construction of deep injection wells north of Lake Okeechobee is outside the scope of this project. The COP defines operations for completed features of the MWD and C-111 South Dade Projects. The associated NEPA documentation to be completed in 2019 is an operational plan, not a feasibility report that is submitted to Congress for authorization and appropriations for construction. A stated goal of the 1994 C-111 South Dade GRR and EIS includes the reduction of damaging freshwater discharges to Manatee Bay and Barnes Sound while maintaining flood protection to agricultural lands east of the C-111 Canal. Goals also include the extension of hydroperiods within the ENP Eastern Panhandle, and the promotion of additional overland flows across the ENP Eastern Panhandle towards northeast Florida Bay. The Corps concurs that changes in the quantity, quality, timing, and distribution of freshwater flows is essential to restoration of the south Florida ecosystem, including Florida Bay and is committed to implementing COP in order to continue progress in Everglades restoration.
Comments Date: October 20, 2017		
MATTHEW JONES - 1	As a lifelong Florida citizen who grew up in Vero Beach along the Indian River Lagoon, and currently lives in Tampa, I support merging the Combined Operational Plan (COP) with the Lake Okeechobee Regulation Schedule (LORS). This is the best way for the Army Corps of Engineers to obtain a holistic understanding of how water moves throughout the entire South Florida system. It will take into account health and human safety as top	Regulation schedule changes for Lake Okeechobee will not be included in the COP. The COP defines operations for completed features of the MWD and C-111 South Dade Projects. An updated Lake Okeechobee Regulation Schedule study will be completed to coincide with completion of the Herbert Hoover Dike (HHD) rehabilitation, which is currently scheduled for 2025. The Corps is working with the State of Florida to explore opportunities to accelerate implementation of HHD rehabilitation and the associated Lake Okeechobee Regulation Schedule study.

COMMENTER	AGENCY/PUBLIC COMMENT	U.S. ARMY CORPS OF ENGINEERS (USACE) RESPONSE
	priorities. I believe we have an opportunity to do for wetlands what Allan Savory has done for grasslands. I agree with the statement made by bullsugar.org in its October 19th article: "It's time to consider how much total drainage and water are available and manage it as a single, interconnected set of resources." Please enter my thoughts unto the public record regarding this issue.	
Comment Date: October 20, 2017		
ROSTY CARYK - 1	I am a resident of Florida and am very concerned about the unacceptable control the Sugar industry has over the water quality of waters of the US in Florida. Please to prioritize Lake Okeechobee's impact on the health and safety of glades residents and riverside communities as it plans COP.	Thank you for your comment. Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project.
Comment Date: October 20, 2017		
TOM WALLS - 1	Please prioritize Lake Okeechobee's impact on the health and safety of glades residents and riverside communities as it plans COP. "It's time to change the priorities in this system and place health and human safety above all else. It's time to consider how much total drainage and water are available and manage it as a single, interconnected set of resources."	Thank you for your comment. Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project.
Comment Date: October 20, 2017		
KATHLEEN MCELROY – 1	Prioritize Lake Okeechobee's impact on the health and safety of glades residents and riverside communities as it plans COP. Kathleen McElroy	Thank you for your comment. Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project.
Comment Date: October 20, 2017		
MARY K VAN KLEUNEN - 1	I am writing regarding my concern for the water quality in the Atlantic and Gulf as a result of the discharges from Lake Okeechobee. This needs resolution, not more studies. I support the southern reservoir and anything the Corps can do to return the water flow to its natural state and allow the Everglades to once again become a filter. This is a quality of life issue (infections, unable to enjoy the state's natural resources), as well as a business issue (tourism, fishing industry).	Programs are in place in the watershed that are specifically focused on water quality such as the FDEP's Basin Management Action Plans and the SFWMD's Lake Okeechobee Protection Program which serves as the overarching water quality restoration plans for the Northern Estuaries including Lake Okeechobee. The creation of storage north of Lake Okeechobee, currently being proposed under the LOWP, if authorized and appropriated, will positively affect the quality of freshwater released to the estuaries which may result in improved salinity and reduced nutrient loading to estuarine waters. The continued implementation of projects under CERP will provide ancillary water quality benefits north and east and west of Lake Okeechobee as storage of water in reservoirs and the associated attenuation of peak flows resulting in increased residence time is expected to lead to a reduction in nutrients and sediments reaching Lake Okeechobee and the Northern Estuaries. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP.
Comment Date: October 21, 2017		
CHARLES GERBER - 1	The current conditions of our waters is Criminal!! The antiquated. Regulations that allows, back pumping, and dumping overages into our rivers needs to be updated considering our current understanding of health risks	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management

COMMENTER	AGENCY/PUBLIC COMMENT	U.S. ARMY CORPS OF ENGINEERS (USACE) RESPONSE
	and flood conditions.... Big Sugar should not "trump" the people's needs and their health concerns. We have talked about this far too long. It is time for action! The water needs to be cleansed and flow south. The glades need it. "We the people "need it. I live on the river. The water prior to dumping was clear to the point I could see the bottom in 4-5'. Within. Hours of dumping. The water became muddy. And smelled heavy of fertilizer (not in my mind). I took friends toward the South Fork dam. Without mentioning they both said" what is that awful smell"? It didn't exist prior!!!! We all know the cause. Come on. Let's stop talking and start fixing. It doesn't require years of consideration. Big sugar should not be able to back pump. They too should feel the pain from water events!!!! Our tourist industry is in the crapper and it will eventually effect our property values as well. Change the World War II Permits Immediately they don't apply. Health issues are real. We can't even swim and fish are dying. Please look past the noise created by the self-serving arguments by big sugars lobbyists! Please help….	infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
Comment Date: October 21, 2017		
LAETITIA CINDRIC - 1	I really find it stupendously insulting that after the 20-30 years of trying to reroute water south to replenish the Everglades is now back to a stupid study by the USACE. Untold millions of tax dollars spent over and over and OVER AGAIN to study the same thing. And yet, the voters vote again and again and AGAIN to purchase the land from BIG SUGAR AND BIG AG and send the damn water south. And you don't do it. You hem and you haw and corporate money changes hands and nothing gets done. Nothing gets done and nothing gets done and Big Sugar just keeps rolling along. And the Everglades are close to death. And you have NOTHING. To show for your damn existence. Nothing ever changes and nothing ever happens to break the stalemate. Personally, I think you suck at your jobs. A bureaucratic quagmire. FIRST, DO NO HARM. We need water. We don't need more effing sugar subsidies. Incredible taxpayer waste. SEND THE ******* WATER SOUTH and stop ******* around with citizens and the environment. Get busy or get out.	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The purchasing of land within the EAA is outside the scope of COP. The Corps looks forward to working alongside the SFWMD to update the Integrated Delivery Schedule for implementation of Everglades restoration and determine the next steps in our collective restoration efforts. The passage of Senate Bill 10by the State of Florida requires a Post-Authorization Change Report (PACR) to reconfiguring the congressionally authorized Central Everglades Planning Project's A-2 Flowage Equalization Basin structure into a deep storage reservoir. Upon completion and identification of a recommended plan, the PACR would be transmitted to Congress for authorization. Once authorized by Congress, the Corps would be able to request construction funds for execution of a Project Partnership Agreement (PPA) and construction initiation. Storage south of the lake in combination with (1) new storage north of the Lake (being developed as part of the Lake Okeechobee Watershed Restoration Project (LOWP); (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43

COMMENTER	AGENCY/PUBLIC COMMENT	U.S. ARMY CORPS OF ENGINEERS (USACE) RESPONSE
		Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake, will serve to restore a more natural system wide hydrology within the enter Everglades ecosystem as envisioned by CERP.
Comment Date: October 22, 2017		
PAULA TURNER - 1	Please prioritize Lake Okeechobee's Impact on the Health and safety of Glades residents and Riverside Communities as you Plan COP, not giving priority to the sugar industry. Consider the total drainage and Water is available and manage it as a single, interconnected resource or combine COP and LORS and manage drainage and lake levels together. Toxic Algae blooms are destroying our wildlife and rivers. Please help us with proper consideration. Thanks.	Thank you for your comment. Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Programs are in place in the watershed that are specifically focused on water quality such as the FDEP's Basin Management Action Plans and the SFWMD's Lake Okeechobee Protection Program which serves as the overarching water quality restoration plans for the Northern Estuaries including Lake Okeechobee. The creation of storage north of Lake Okeechobee, currently being proposed under the LOWP, if authorized and appropriated, will positively affect the quality of freshwater released to the estuaries which may result in improved salinity and reduced nutrient loading to estuarine waters. Changes to LORS 2008 are outside the scope of COP. An updated Lake Okeechobee Regulation Schedule study will be completed to coincide with completion of the Herbert Hoover Dike (HHD) rehabilitation, which is currently scheduled for 2025. The Corps is working with the State of Florida to explore opportunities to accelerate implementation of HHD rehabilitation and the associated Lake Okeechobee Regulation Schedule study.
Comment Date: October 20, 2017		
ALLISON M. E., **BONNIE E. BARNES** **LAURA AND DON BROOKS** **DAVID DIMMEL** **CARLOS ESTAPE** **BETHANY FOWLER**	The lifestyle and economy of the Florida Keys are intrinsically linked to the health of ENP and Florida Bay. Clean water to sustain the ecosystem is key. Restoration projects to benefit ENP and the Florida Keys have been under construction for many years, paid for by significant taxpayer investment. Now, writing an operations plan for how to use these projects is the critical next step. This is the time to achieve the ecosystem benefits we desperately need in the keys. Please ensure that protecting the waters of the southern Everglades and Florida Bay is the top priority for operating restoration projects in south Miami-Dade! These projects include the Modified Water Deliveries (MWD), C-111 South Dade, and C-111 Spreader Canal Projects, which will be guided by the Combined Operation Plan (COP) currently under consideration by the U.S. Army Corps of Engineers and other state and federal agencies.	Thank you for your comment. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated in 2019 following completion of the necessary NEPA documentation including the Final EIS and ROD.

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FRED HARTNER **LAUREN L. HARTNER** **COLIN HOWE** **JIM SPENCER** **KEITH KROPF** **LOUIS LINDER** **ELENA M.F. MURATORI** **ROBERT W. MURRAY** **NADIA SPENCER** **SIENNA PICHARD** **JACOB POELMA** **JAMES P. SCHMEISER** **BURMLEY TRUAX** **LISA MONGELIA**	As a member of the Florida keys community, responsible operation of these projects to maximize restoration benefits for the everglades and Florida Bay is important to me.	
Comment Date: October 26, 2017		
ALICE NAGELE - 1	I just wanted to let you know, as an area citizen (West Palm Beach, FL), that I am for the usage of funds both to repair the H. Hoover Dike and for creating a means to move excess water away from our Indian River estuary system.	The purpose of COP is to define operations for the constructed features of the MWD to ENP and C-111 South Dade Projects. The COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with these projects. Features of the MWD and C-111 South Dade Projects are located in Miami-Dade County,

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		including portions of ENP and adjacent areas. Operations for water management within WCA 3A located in Broward County will also be considered. The Proposed Action does not include operational modifications to the current Lake Okeechobee Regulation Schedule (LORS 2008). Separate planning efforts are currently underway that will provide opportunities for better management of lake water levels and the reduction of high volume discharges to the Northern Estuaries. The Herbert Hoover Dike Dam Safety Modification Report (DSMR) and Record of Decision (ROD) was signed on August 30, 2016. A cutoff wall was determined to be the least costly, technically acceptable risk reduction measure for remediation of the HHD embankment in areas that have been identified as high risk due to internal erosion failure modes (erosion of the internal structure of the embankment due to seepage forces). Implementation of the DSMR risk reduction project is planned from 2019 through 2025 dependent on funding.
Comment Date: October 26, 2017		
DIANE GOLDBERG - 1	Please let me know when you will be starting the planning of the reservoir south of Lake Okeechobee to lessen the impacts on the St Lucie River, Indian River Lagoon and the Caloosahatchee. We support this plan and we need it as soon as possible.	The purchasing of land within the EAA is outside the scope of COP. The Corps looks forward to working alongside the SFWMD to update the Integrated Delivery Schedule for implementation of Everglades restoration and determine the next steps in our collective restoration efforts. The passage of Senate Bill 10 requires a Post-Authorization Change Report (PACR) to reconfigure the congressionally authorized Central Everglades Planning Project's A-2 Flowage Equalization Basin structure into a deep storage reservoir. Upon completion and identification of a recommended plan, the PACR would be transmitted to Congress for authorization. Once authorized by Congress, the Corps would be able to request construction funds for execution of a Project Partnership Agreement (PPA) and construction initiation. The Corps is currently working with the SFWMD to identify the necessary steps to complete a PACR for submission to the Assistant Secretary of the Army of Civil Works.
Comment Date: October 26, 2017		
KRIS PAGENKOPF - 1	The Combined Operational Plan (COP) will affect lake levels, the risk that people living below the dike face a deadly breach, and the risk that toxic algae blooms are discharged to riverside communities. I understand that the COP has to work within the 68-year-old Central and South Florida Plan, authorized by congress just after World War II. That was over 60 years ago, when Florida's population was less than 3 million (vs. 20 million today) and communities on the Caloosahatchee and St. Lucie rivers were 1/20th their current populations. We need an update of these authorizations. But antiquated statutes are only part of the reason today's management routinely puts people at risk. A bigger part is our accounting separately for the lake's capacity for water supply and drainage from the watersheds to its north and south, and refusing to accurately measure how much water and drainage everyone in the system needs and gets. The danger of this uncoordinated management is exposed by events like Hurricane Irma. It would be common sense to prioritize dike safety during the summer and fall by keeping lake levels low and stopping unnatural inflows. That would also reduce the chances of discharging toxic algae and its associated health risks to riverside communities. But today's management system isn't governed by common sense. Instead we allow a section of the federal Water Resource Development Act (2000) called the "savings clause" to prioritize the sugar	Changes to LORS 2008 are outside the scope of COP. The COP defines operations for completed features of the MWD and C-111 South Dade Projects. The associated NEPA documentation to be completed in 2019 is an operational plan, not a feasibility report that is submitted to Congress for authorization and appropriations for construction. The WRDA of 2000 requires CERP projects to identify water needed for the natural system to achieve CERP restoration goals and protect it from other potentially competing uses. At the same time, existing legal sources of water supply for municipal and agricultural needs must also be protected. In addition, CERP implementation cannot reduce existing levels of service for flood protection. WRDA 2000 requires the inclusion of "Savings Clause" analyses within each CERP PIR. Development of the COP is not a CERP component. An updated Lake Okeechobee Regulation Schedule study will be completed to coincide with completion of the Herbert Hoover Dike (HHD) rehabilitation, which is currently scheduled for 2025. The Corps is working with the State of Florida to explore opportunities to accelerate implementation of HHD rehabilitation and the associated Lake Okeechobee Regulation Schedule study. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP.

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	industry's drainage needs, letting them pump excess rainfall (anything over 1") all summer long into the system south of the lake, and when that's full, into the lake itself--the back-pumping that raised lake levels this year even as fears of dike failure dominated headlines. Meanwhile the federal Lake Okeechobee Regulation Schedule (LORS) isn't required to account for the savings clause's influence on the system or to prevent the sugar industry's back-pumping into a rising lake. It's time to change the priorities in this system and place health and human safety above all else. It's time to consider how much total drainage and water are available and manage it as a single, interconnected set of resources. Maybe the COP and LORS could be combined, managing drainage and lake levels to prioritize the people in the system. I ask the Corps to prioritize Lake Okeechobee's impact on the health and safety of glades residents and riverside communities as it plans COP.	
Comment Date: October 26, 2017		
DON HIGG - 1	I am a taxpayer in the state of Florida and I want to go on record requesting that your department make it a high priority to insure that the plans you put in place for future infrastructure moves water south into Everglades National Park and Florida Bay	Thank you for your comment. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated in 2019 following completion of the necessary NEPA documentation including the Final EIS and ROD.
Comment Date: October 26, 2017		
BRIAN O'NEIL - 1	Please wake up!	Thank you for your comment. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated in 2019 following completion of the necessary NEPA documentation including the Final EIS and ROD.
Comment Date: October 26, 2017		
LORA KNIGHT - 1	Please restore, as much as possible, the flow of water to our precious Everglades.	Thank you for your comment. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated in 2019 following completion of the necessary NEPA documentation including the Final EIS and ROD.
Comment Date: October 26, 2017		
JUSTIN LORCH - 1	I have lived most of my life along the St Lucie and Indian Rivers. I have watched what the discharges from Lake Okeechobee have done to these ecosystems in that time. I fear what the situations will be in the future. I am an avid recreational angler, it's been my passion for almost 30 years now. I now travel the entire state looking for areas to fish that even come	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria

COMMENTER	AGENCY/PUBLIC COMMENT	U.S. ARMY CORPS OF ENGINEERS (USACE) RESPONSE
	close to the productivity I used to enjoy in the St Lucie and Indian Rivers around Stuart when I was younger. These ecosystem can be restored with the help of the Army Corps of Engineers. I feel that as fellow Engineers, you have a duty to help the policy makers understand how to more effectively manage a system that is: creating risk to life by threatening the Herbert Hoover dike by allowing the sugar industry to back pump excess water into the Lake even when the Lake is already dangerously high levels; introducing toxic and potentially dangerously polluted water into estuary systems on both coast, risk the health and safety of populations along those coasts from potentially hazardous runoffs, jeopardizing losing the Biscayne Aquifer by choking off its fresh water supply and risking salt water intrusion. The policies and strategies that govern the management of the Lake and drainage surrounding it were put into place long before we had a good understanding of the complexity of the systems we were interfering with. We must update these policies and regulations to be beneficial to everyone involved and to start to restore the environments affected by these water management policies. As a voting citizen, I can pressure my elected officials and occasionally install new ones, but our voice can easily be drowned out by the money involved in Florida politics. Having the voice of the Army Corps of Engineers alongside ours would carry the weight needed to enact change. Thank you for taking the time to read this.	defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
WAYNE RALPH - 1	We moved to Cape Coral two years and three months ago from Oregon to retire, explore and boat in paradise. We assumed that nature here was being treated respectfully. We found its quite the opposite. Between the pollution pumped into lake O that pollutes our river systems and the locals here pumping their septic tanks into our canal systems, change is not going to happen anytime in the near future or ever as this trend appears. Florida has its natural beauty that struggles to survive despite the me first attitude of the existing residents and voting population that continues kicking the can down the road because they like it how it is. You know what they say, if you don't like it, move on. So we are. Adios and best wishes to you Florida.	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve

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		to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
Comment Date: October 26, 2017		
MADGE ALLEN - 1	I'm a homeowner on Gulf of Mexico access, Alligator Slough in Cape Coral, Florida. We watch the water turn from blue to brown as dangerous, dirty water is released from Lake O, down the Caloosahatchee River. This whole economy is dependent on retirees and tourists; who is going to want to live or recreate here when the whole ecosystem is destroyed from toxic water releases! Please uphold the law and will of the voters, and get the water going south...which will naturally clean the water and restore the Everglades. We are watching and keeping track!	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
Comment Date: October 26, 2017		
KIRSTEN LOVETT - 1	I saw that "The COP, whatever it turns out to be, has to work within the 68-year-old Central and South Florida Plan, authorized by congress just after World War II. In other words, "Our hands are tied" by a federal decree from 68 years ago. In January Sen. Bob Graham called for an update of these authorizations, but antiquated statutes are only part of the reason today's management routinely puts people at risk. A bigger part is our accounting separately for the lake's capacity for water supply and drainage from the watersheds to its north and south, and refusing to accurately measure how much water and drainage everyone in the system needs and gets. The danger of this uncoordinated management is exposed by events like Hurricane Irma. It's time to change the priorities in this system and place health and human safety above all else. It's time to consider how much total drainage and water are available and manage it as a single, interconnected set of resources.	Thank you for your comment. Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project.
Comment Date: October 26, 2017		
ED WILSON - 1	Please do what is right and for clean water in SW & SE FL, send water south, the sugar industry is holding everybody hostage. Did you know the sugar	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of

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	industry also gets federal subsidies from the farm bill, which means they never have a loss, even if the weather is bad and they lose crops they get paid, and even worse if they grow too much sugar our US government must buy it from them, so again they lose nothing. The price consumers and manufactures pay for sugar in the US is almost double that of world sugar. DO THE RIGHT THING SOONER THEN LATER	implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP.
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MARK POTTER - 1	I just wanted to take the time to express my thoughts regarding CERP and the COP being discussed. I spent the first 20 years growing up in south Florida just a couple of miles from the Everglades. I have watched all of south Florida grow out of control since the 1970's. I left in 1978 and moved to Gainesville Florida. I am still very fond of the profoundly diverse environment the Everglades supports and appreciate the perils the continued demand on its resources bring. The restoration of the natural watershed from the lake to the bay is empirical to the very survival of the habitat. I believe the science and studies which call for the construction of the reservoir south of the lake be the first priority. This accomplishes two things that are very important to the project and its goals. First reducing the lake water level will reduce the pressure on the aging berm and reduce the chance of a breach. Second it will allow a secondary source of natural detoxification of the water discharges of Lake Okeechobee to occur before entering the watershed. This along with more sustainable farming practices would combine to begin the process of natural restoration of the Everglades. I am sure I have said nothing that you have not already heard. I just needed to let someone know how I feel about this and the prolonged timeline it has taken just to get this far, very frustrating and disappointing. Thanks for listening.	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated in 2019 following completion of the necessary NEPA documentation including the Final EIS and ROD.
Comment Date: October 26, 2017		
MARGIE HANCOCK - 1	Clean water and safety depend you the Army Corps of Engineers! Please Save the Everglades!	Thank you for your comment. Implementation of COP is anticipated to increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. The Corps is committed to implementing COP in order to continue progress in Everglades restoration. Implementation of the Proposed Action is anticipated in 2019 following completion of the necessary NEPA documentation including the Final EIS and ROD.
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TED STEVENS - 1	Please, stop killing our Caloosahatchee, St. Lucie River and the Indian River lagoon, by these massive releases from lake Okeechobee. This is a problem over 50 years old and that seems excessive time even for the government to get a problem fixed. It's supposed to rain frogs during the rainy season in Florida! Until a dynamic southern storage reservoir and River of Grass flows to Florida Bay are complete, there will be no curing the problems for Okeechobee, the Caloosahatchee, St. Lucie and Florida Bay. As with all politicians and high profile public figures I am sure you will be careful not to let the buck stop with you!	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
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CHERIE ZADLO - 1	I am writing to request your consideration and support to prioritize Lake Okeechobee's impact on the health and safety of residents, visitors and communities as the Army Corps of Engineers prepares its Combined Operational Plan. There is more evidence everyday linking toxic algae blooms produced by damaging fresh water flows to ALS, Parkinson's, Alzheimer's and liver diseases alone. It's time to restore human needs over the sugar industry. Please let me know how else I can assist the effort to move forward toward the rapid development and execution of a sound resolution.	Thank you for your comment. Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Programs are in place in the watershed that are specifically focused on water quality such as the FDEP's Basin Management Action Plans and the SFWMD's Lake Okeechobee Protection Program which serves as the overarching water quality restoration plans for the Northern Estuaries including Lake Okeechobee. The creation of storage north of Lake Okeechobee, currently being proposed under the LOWP, if authorized and appropriated, will positively affect the quality of freshwater released to the estuaries which may result in improved salinity and reduced nutrient loading to estuarine waters.
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JAN PASHKE - 1	Please, quickly work on sending the water from Lake Okeechobee south to be cleaned, and then south from there into the Everglades, where it would naturally go! Even unpolluted water from Lake Okeechobee into the St. Lucie Estuary is harmful to the Estuary, because it disrupts the salinity of the water. Sending polluted water from Lake Okeechobee creates a nightmare!	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria

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	Please, please send the water south and stop releasing it into the St Lucie Estuary!	defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects.
NANCY R DEAN & ROBERT V DEAN - 1	We understand the need to strengthen the Hoover Dike; however, only additional water storage will save the Everglades.	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP The Herbert Hoover Dike Dam Safety Modification Report (DSMR) and Record of Decision (ROD) was signed on August 30, 2016. A cutoff wall was determined to be the least costly, technically acceptable risk reduction measure for remediation of the HHD embankment in areas that have been identified as high risk due to internal erosion failure modes (erosion of the internal structure of the embankment due to seepage forces). Implementation of the DSMR risk reduction project is planned from 2019 through 2025 dependent on funding.
Comment Date: October 26, 2017		
ARLENE DORAN - 1	Thank you for the opportunity to comment on this critical issue. I have been on the beach when the black discharge water has rolled in and it was awful. The tourists that were there were very unhappy too. They will not be returning.	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria

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	I have also seen the video of the toxic guacamole looking algae, and worry that I will see that too. The health and future of the estuaries of the Caloosahatchee and St. Lucie rivers and the Everglades is dependent on the decisions you are making now. Please make the changes necessary so that the threats of black water plumes and toxic algae are behind us.	defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects. Programs are in place in the watershed that are specifically focused on water quality such as the FDEP's Basin Management Action Plans and the SFWMD's Lake Okeechobee Protection Program which serves as the overarching water quality restoration plans for the Northern Estuaries including Lake Okeechobee. The creation of storage north of Lake Okeechobee, currently being proposed under the LOWP, if authorized and appropriated, will positively affect the quality of freshwater released to the estuaries which may result in improved salinity and reduced nutrient loading to estuarine waters.
Comment Date: October 26, 2017		
MORGAN S ROTHE - 1	I hope the ACOE will do everything it can to help the Everglades and Lake Okeechobee and the rivers that feed into it and out of Okeechobee by building a refurbished Hoover dike and a large enough reservoir to hold polluted water. Thank you for your service	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects. Programs are in place in the watershed that are specifically focused on water quality such as the FDEP's Basin Management Action Plans and the SFWMD's Lake Okeechobee Protection Program which serves as the overarching water quality restoration plans for the Northern Estuaries including Lake Okeechobee. The creation of storage north of Lake Okeechobee,

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		currently being proposed under the LOWP, if authorized and appropriated, will positively affect the quality of freshwater released to the estuaries which may result in improved salinity and reduced nutrient loading to estuarine waters. The Herbert Hoover Dike Dam Safety Modification Report (DSMR) and Record of Decision (ROD) was signed on August 30, 2016. A cutoff wall was determined to be the least costly, technically acceptable risk reduction measure for remediation of the HHD embankment in areas that have been identified as high risk due to internal erosion failure modes (erosion of the internal structure of the embankment due to seepage forces). Implementation of the DSMR risk reduction project is planned from 2019 through 2025 dependent on funding.
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KATHLEEN DEMPSEY - 1	We desperately need the reservoir to be provided south of Lake Okeechobee to preserve our state and save the dyke. At present the blue-green algae is a big problem, and it seems officials are not acting quickly. Let's get going, PLEASE!	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects. Programs are in place in the watershed that are specifically focused on water quality such as the FDEP's Basin Management Action Plans and the SFWMD's Lake Okeechobee Protection Program which serves as the overarching water quality restoration plans for the Northern Estuaries including Lake Okeechobee. The creation of storage north of Lake Okeechobee, currently being proposed under the LOWP, if authorized and appropriated, will positively affect the quality of freshwater released to the estuaries which may result in improved salinity and reduced nutrient loading to estuarine waters.
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SCOTT LOGAN - 1	Drainage is scarce in this system, and we already knew that heavy rain fills the lake faster than we can drain it. It would be common sense to prioritize dike safety during the summer and fall by keeping lake levels low and stopping unnatural inflows. That would also reduce the chances of discharging toxic algae and its associated health risks to riverside communities. But today's management system isn't governed by common sense.	Changes to LORS 2008 are outside the scope of COP. The COP defines operations for completed features of the MWD and C-111 South Dade Projects. The associated NEPA documentation to be completed in 2019 is an operational plan, not a feasibility report that is submitted to Congress for authorization and appropriations for construction. The WRDA of 2000 requires CERP projects to identify water needed for the natural system to achieve CERP restoration goals and protect it from other potentially competing uses. At the same time, existing legal sources of water supply for municipal and agricultural needs must also be protected. In addition, CERP implementation cannot reduce existing levels of service for flood protection. WRDA

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	Instead we allow a section of the federal Water Resource Development Act (2000) called the "savings clause <Blockedhttp://d3n8a8pro7vhmx.cloudfront.net/bullsugar/mailings/1171/attachments/original/wrda_savings_clause.pdf?1508445650> " to prioritize the sugar industry's drainage needs, letting them pump excess rainfall (anything over 1") all summer long into the system south of the lake, and when that's full, into the lake itself--the back-pumping that raised lake levels this year even as fears of dike failure dominated headlines. Meanwhile the federal Lake Okeechobee Regulation Schedule (LORS) isn't required to account for the savings clause's influence on the system or to prevent the sugar industry's back-pumping into a rising lake--it just tells the Corps when to flush it into the rivers. Asked last month how the industry could get away with this, SFWMD's Ernie Marks replied honestly: They have a permit. Better, the sugar industry has--thanks to a disjointed, complicated, ancient collection of regulations--the highest priority in the system. That's why no matter how catastrophic a year Florida Bay or the Everglades or the Caloosahatchee or the St. Lucie have, the sugar industry thrives--since 1980 the crop has never had a bad year <Blockedhttp://www.bullsugar.org/sfwmd_okeechobee_phosphorus>. Meanwhile liver failure clusters pop up along the river, with neurological diseases and a host of serious illnesses that we're only just beginning to trace back to toxic Lake Okeechobee discharges. And residents living in the shadow of the dam wait for the next storm and the next evacuation order.	2000 requires the inclusion of "Savings Clause" analyses within each CERP PIR. Development of the COP is not a CERP component. An updated Lake Okeechobee Regulation Schedule study will be completed to coincide with completion of the Herbert Hoover Dike (HHD) rehabilitation, which is currently scheduled for 2025. The Corps is working with the State of Florida to explore opportunities to accelerate implementation of HHD rehabilitation and the associated Lake Okeechobee Regulation Schedule study. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP.
Comment Date: October 27, 2017		
CARLA ANCHORS - 1	Now is the time for "Big Sugar" to give up it's hold on the land we need to create water holding areas for Lake O. They have been "King", for years and the need is great!!! DO NOT drill deep water wells or we will have MORE sinkholes all over.	The construction of deep injection wells north of Lake Okeechobee is outside the scope of this project. The COP defines operations for completed features of the MWD and C-111 South Dade Projects. Water management operating criteria defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP.
Comment Date: October 27, 2017		
DA HELLER - 1	I regularly visit Florida to fish and enjoy the everglades and offshore areas. The catastrophic release of nutrient laden water from lake O. was a disaster that should never of happened and should not happen again. It was an environmental and economic disaster an perhaps only benefited the sugar industry.	There have been several state and federal efforts implemented or being implemented that improve the timing and distribution of water throughout the system. Currently, both state and federal projects are in various phases of implementation, including construction, design, and planning. The system is constantly being improved with every project that is completed. COP will result in a comprehensive integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 South Dade Projects in Miami Dade County. Many of the MWD and C-111 South Dade Project features have been built and/or are nearing completion. Water management operating criteria

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	I strongly urge you to move forward and begin an in depth review and revision of water and drainage plans with a "must" criterion that new plans contribute to healthy everglades and off shore areas and eliminate the risk of future harmful release.	defined during development of COP will be incorporated into the 2012 WCAs, ENP and ENP to SDCS Control Plan following completion of NEPA. The 2012 Water Control Plan guides operations for associated C&SF infrastructure in south Florida. Implementation of COP will allow the opportunity to send water south and increase the availability of water deliveries from WCA 3A to ENP through NESRS and improve hydrologic conditions in Taylor Slough, the Rocky Glades, and the eastern panhandle of ENP. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP. Benefits to the Northern Estuaries will be achieved through the continued implementation of these projects. Programs are in place in the watershed that are specifically focused on water quality such as the FDEP's Basin Management Action Plans and the SFWMD's Lake Okeechobee Protection Program which serves as the overarching water quality restoration plans for the Northern Estuaries including Lake Okeechobee. The creation of storage north of Lake Okeechobee, currently being proposed under the LOWP, if authorized and appropriated, will positively affect the quality of freshwater released to the estuaries which may result in improved salinity and reduced nutrient loading to estuarine waters.
Comment Date: October 27, 2017		
SANDY TEGER – 1	There is no question in my mind, or that of my neighbors in Lee County, that health and human safety should rank number one in South Florida's water management system. This is clearly not the case today and must be changed. It is unconscionable that we allow a section of the federal Water Resource Development Act (2000) to prioritize the sugar industry's drainage needs, letting them pump excess rainfall all summer long into the system south of the lake, and when that's full, into the lake itself. Meanwhile the federal Lake Okeechobee Regulation Schedule (LORS) isn't required to account for this influence on the system or to prevent the sugar industry's back-pumping into a rising lake--it just tells the Corps when to flush it into the rivers. The sugar industry has the highest priority in the system and that is just plain WRONG! There is no question that the health and safety of the people of Florida should and must be our number 1 priority.	Health and human safety is a priority for the Corps in all Federal actions pursued including daily operations of Lake Okeechobee and the operation of the C&SF Project. The COP defines operations for completed features of the MWD and C-111 South Dade Projects. The associated NEPA documentation to be completed in 2019 is an operational plan, not a feasibility report that is submitted to Congress for authorization and appropriations for construction. The WRDA of 2000 requires CERP projects to identify water needed for the natural system to achieve CERP restoration goals and protect it from other potentially competing uses. At the same time, existing legal sources of water supply for municipal and agricultural needs must also be protected. In addition, CERP implementation cannot reduce existing levels of service for flood protection. WRDA 2000 requires the inclusion of "Savings Clause" analyses within each CERP PIR. Development of the COP is not a CERP component. An updated Lake Okeechobee Regulation Schedule study will be completed to coincide with completion of the Herbert Hoover Dike (HHD) rehabilitation, which is currently scheduled for 2025. The Corps is working with the State of Florida to explore opportunities to accelerate implementation of HHD rehabilitation and the associated Lake Okeechobee Regulation Schedule study. Storage south of the lake currently being considered under the State of Florida's Senate Bill 10, in combination with (1) new storage north of the Lake (being developed as part of LOWP; (2) storage reservoirs being constructed east of the lake (C-44 Reservoir and other reservoirs and STAs associated with the approved Indian River Lagoon-South Project) and west of the lake (C-43 Reservoir); and (3) completion of additional infrastructure to allow flow south of the lake under the CEPP, will serve to restore a more natural system wide hydrology within the entire Everglades ecosystem as envisioned by CERP.
Comment Date: October 28, 2017		

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BECKY GLASS – 1	Save the Lake and the people support changes to the water system.	Thank you for your comment.