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Ft. Lauderdale, FL 33303

Terri Jordan-Sellers
Senior Biologist
Jacksonville District – USACE

Dear Ms. Terri Jordan-Sellers:

South Florida Wildlands Association (SFWA) appreciates the opportunity to submit these brief scoping comments in response to the the proposed expansion and dredging of Port Everglades in Broward County, Florida. SFWA is a regional environmental organization (501c3) which focuses on the protection of wildlife and habitat in the Greater Everglades. We have submitted both oral and written comments on this project in the past – and incorporate all of our previous comments by reference in this current document.

We have identified the following “topics for analysis” which we believe are essential to the “hard look” the agency is required to take in preparation of its forthcoming NEPA document on the port.

1) Impacts on manatees – much of the area surrounding Port Everglades is known habitat for this federally listed species. The Florida Fish and Wildlife Conservation Commission (FWC) has identified numerous ways ports can impact manatees. For the purpose of this expansion project, we are most concerned about the impacts of dredging, explosives, and sediment disposal. We are also concerned about impacts of increased port activities. A complete summary of the FWC's concerns with regard to manatees can be found here – and we incorporate by reference the entirety of their document into these comments. The corps needs to carefully examine all aspects of this project for impact and potential take of manatees.

<http://myfwc.com/wildlifehabitats/managed/manatee/habitat/port-facts/>

2) Impacts of dredged material on coral reefs - taking account of impacts to similar reefs in the vicinity of the Port of Miami which were degraded by post-Panamax dredging in that location just a short time ago.

3) Impacts on recreational opportunities at the Dr. Von D. Mizell-Eula Johnson State Park and Anne Kolb Nature Center. See list of activities which take place in these historic and heavily used recreation areas and preserves. Impacts on all activities and protected habitats from the construction as well as changed port activities should be considered in the Corps' analysis of this project.

<https://www.floridastateparks.org/park/Mizell-Johnson>

4) Impacts on sea turtles – From Broward County descriptive website on the various species which nest on county beaches - “Sea turtles, a marine reptile, are one of the planet's most ancient creatures, having been around since the time when dinosaurs roamed - over 110 million years ago. Today, seven different species of sea turtles live throughout the world with each species classified as either threatened or endangered. Of these, five species of sea turtles call Florida's waters home and three species; the loggerhead sea turtle (*Caretta caretta*), the green sea turtle (*Chelonia mydas*), and the leatherback sea turtle (*Dermochelys coriacea*) nest annually on Broward County's beaches from April through September. Loggerhead sea turtle nests are the most commonly found in the area, historically accounting for over 90% of all sea turtle nests in Broward County. In fact, the beaches from the Space Coast to the Gold Coast of Florida represent the second most important nesting area in the world for loggerhead sea turtles.”

As in our statements above – all aspects of this project – including construction and increased port activity - needs to be considered in the forthcoming NEPA document.

5) Impacts of dredging/turbidity and all aspects of this port expansion on all marine species, fish species, as well as recreational fishing in the area

6) Impacts of increased traffic on already overcrowded roads in Broward County.

7) Impacts of runoff from Port Everglades expansion, port activities, and port traffic on coastal, Intracoastal, and in-shore waters. Studies have identified vehicles and roadways as a major source of heavy metals in waterways. And Broward County's waterways are already heavily impacted by heavy metals from a variety of sources. Here's a quote from a review article produced by Fairfax County, Virginia:

“About half of the zinc and copper contribution to the environment from urbanization is from automobiles. Brakes release copper, while tire wear releases zinc. Motor oil also tends to accumulate metals as it comes into contact with surrounding parts as the engine runs, so oil leaks become another pathway by which metals enter the environment.

On the road surface, most heavy metals become bound to the surfaces of road dust or other particulates. During precipitation, the bound metals will either become soluble (dissolved) or be swept off the roadway with the dust. In either case, the metals enter the soil or are channeled into a storm drain.”

<http://www.fairfaxcounty.gov/nvswcd/newsletter/heavymetal.htm>

8) The question of whether the Port Everglades expansion project serves the public interest should also be covered in the NEPA document. The Port of Miami, only about 30 miles to the south, was deepened and widened recently to accommodate post-Panamax shipping – and not without consequences to coral reefs and other marine resources. The physical and chemical stresses on Broward County's waterways and marine resources are already severe. Those are due to a combination of agricultural runoff from the Everglades Agricultural Area coming down the New River, urban and road runoff into canals and waterways, recreational boating (e.g. groundings and collisions with coral reefs), use of sunscreen, and massive sewage and waste water releases from both ocean outfall pipes (there are two in Broward County) as well as seepage through limestone into inshore waters from waste water that is deep-well injected. And these local impacts are being added to by the more global impacts of sea level rise, ocean

acidification, and sea temperature rise. Bleaching of coral reefs in Broward County is already a major problem as are declines in local fish populations. We believe this port expansion will add significantly to existing problems – and the NEPA document that is prepared should identify and attempt to quantify all impacts.

Best regards,

Matthew Schwartz
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