

U.S. DEPARTMENT OF THE INTERIOR,
OFFICE OF THE SECRETARY,
Washington, D.C., June 26, 1968.

Lt. Gen. WILLIAM F. CASSIDY,
*Chief of Engineers,
Department of the Army,
Washington, D.C.*

DEAR GENERAL CASSIDY: This is in reply to your letter of June 18, 1968, requesting our comments on your proposed report on Miami Harbor, Florida.

The Fish and Wildlife Service is pleased that your report adequately considers the fish and wildlife resources of the area. Your plan for disposal of spoil in the approved areas is noteworthy.

The Federal Water Pollution Control Administration states that the Corps of Engineers proposes to modify the existing navigation project at Miami Harbor by deepening the main channel, the approach and the turning basin and widening the entrance channel in the area between the jetties. If proper precautions are taken to avoid damage from silt resulting from spoil disposal, construction activities are not expected to have significant effects on water quality in the area. We note that much of the material to be excavated is rocky, indicating that little organic solids would be involved.

Construction of causeways and land fill projects have already severely restricted the natural tidal flows and the accompanying flushing action originally afforded these waters. The disposal of spoil adjacent to existing land areas is expected to further reduce local interchange of fresh and salt water, though it is anticipated that the reduction in interchange will be partially offset by the deeper channel.

While ocean outfalls are utilized for discharge of treatment plant effluents by the City of Miami and Miami Beach, numerous small treatment plants discharging treated effluent to canals and waterways leading into Biscayne Bay are now being used to take care of wastes from rapidly growing developments in the surrounding areas. We hope that these plants will eventually be tied to an ocean outfall or that advance waste treatment methods will be applied. Discharge of treated wastes from developing areas must be anticipated, however. In addition, pollution from the many commercial and pleasure crafts which use the harbor is becoming more severe. As a result of the intensive recreational use of the waters of Biscayne Bay, it is important that any changes which could contribute to further reduction in the quality of the Bay be avoided.

It has become increasingly apparent in the last several years that a comprehensive study of water quality problems in the entire Biscayne Bay area is needed. The complex changes in water movements and tidal exchange resulting from dredging and filling activities, from causeways and from the proposed changes in fresh water flow into the Bay which are associated with the increase in storage capacity of Lake Okeechobee and back pumping from certain areas indicate the desirability of an hydraulic model to show the effect of existing and proposed construction on tidal currents and water quality.

In view of the above, we are concerned that filling adjacent to Virginia Key, Fisher Island, Lummus Island and Dodge Island be replaced by shore disposal or that the spoil be so placed that it will not further restrict tidal exchange in the Bay.

The requirements of local cooperation in providing spoil disposal areas and necessary diking as well as regulations prohibiting discharge of pollutants to project areas should assist in the prevention and control of pollution. Particular attention in this area should be given to prevention of the discharge of untreated wastes from vessels using the harbor area.

The Federal Water Pollution Control Administration will be pleased to work with the appropriate field offices in any necessary review of detailed plans for disposal of dredging spoil in the interests of water pollution control.

The opportunity of presenting our views is appreciated.

Sincerely yours,

ROBERT W. NELSON,
Deputy Assistant Secretary of the Interior.