the park; specifically in the area adjacent to the 8.5 SMA. Impacts to downstream structures and facilities from water diverted from the 8.5 SMA must also be evaluated.

One of the findings of the Science Sub-group of the South Florida Ecosystem Restoration Working Group involved ecosystem impacts from the loss of over half of the historic area of the former Everglades. A resulting recommendation was that the extent and heterogeneity of the natural system should be increased. An evaluation should be made of the continued cumulative loss or possible addition of Everglades habitat which will result from the alternatives under consideration. This should include the evaluation of the loss of wetlands currently existing in the 8.5 SMA.

With implementation of the Modified Water Deliveries project water levels will return to a more natural higher elevation. Therefore, structural flood mitigation alternatives should be evaluated for their impact on the re-establishment of wetlands at all elevations.

One of the reasons for the endangered status of the Cape Sable Seaside Sparrow has been the loss of critical habitat. Impacts to the survival and recovery of the sparrow must be evaluated from the impacts associated with the induced development potential provided by structural flood mitigation alternatives.

A full "cost accounting" cost and benefit analysis of future development situations under the existing flood protection limits, structural flood protection alternatives and acquisition should be performed. This analysis must include secondary costs to other governmental entities. Providing limited flood protection (mitigation) may induce additional development in this flood prone area. Increased cost of property damages associated with each alternative should be evaluated. The analysis should also include the cost to the environment from the loss of wetlands and flood prone areas that provide fish and wildlife habitat, natural floodwater storage and water quality treatment benefits.

Potential water quality impacts are a major concern. Alternatives which increase development in the 8.5 SMA are of special concern since no water quality treatment system for the area currently exists. Even on low density residential lots of 1 acre or more there is plenty of room for agricultural activity (fruit trees, etc.) on the open space surrounding the house and septic tank. An unknown portion of pollutants contained in the groundwater under a fully or partially developed 8.5 SMA would have the potential to affect either directly or indirectly, the Outstanding Florida Waters of Everglades National Park and/or other water bodies. As an Outstanding Florida Water, the water quality standard for all parameters in Everglades National Park is non-degradation from the background level present in the year before designation (March 1978). There is also a settlement agreement between the state and federal government, which includes water quality requirements. A full evaluation of water quality impacts is necessary.