



Celebrating 40 years of island conservation

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October 31, 2008

Pinar Balci, PhD
South Florida Water Management District
MS7640
3301 Gun Club Road
West Palm Beach, FL 33406

RE: Caloosahatchee River Watershed Protection Plan - SCCF Comments

Dear Dr. Balci:

The Sanibel Captiva Conservation Foundation (SCCF) appreciates the opportunity to provide these comments on the Caloosahatchee River Watershed Protection Plan (CRWPP).

Over the past year SCCF staff has participated with other stakeholders on the working team which has allowed us to bring issues and concerns forward during the process. These comments reflect our concerns about portions of the plan but also reflect our support of the plan which serves to move this process forward by identifying needs of the system to improve the public health, safety and welfare of the Caloosahatchee. Our goal is to support and enable restoration of the river to a functional fishable, swimmable river. We appreciate your consideration of these comments.

The Northern Everglades plans are designed to coordinate three interconnected watersheds; Lake Okeechobee, Caloosahatchee and the St. Lucie river with the objectives of maximizing the storage needs of the system to improve water quantity, quality, frequency and duration of water flows in order to address nutrient load reductions to meet TMDL goals currently being formulated.

The plan proposes to do this through three components: 1) Pollutant source control programs 2) Construction of structural elements and 3) Research and water quality monitoring programs.

Using models, a series of alternatives were developed to evaluate baseline conditions, water quantity needs and water quality objectives. The evaluation resulted in the selection of

Alternative 4 as the basis of the CRWPP. The findings reveal storage needs in the Caloosahatchee watershed of 400,000 acre feet of storage - 170,000 ac ft would be in the C43 West Basin Reservoir - and an additional 900,000 - 1.4 million acre feet of storage north of Lake Okeechobee.

These storage figures are significantly higher than the previously determined 170,000 acre feet recommended with the C43 West Basin Reservoir (WBR)-project although they correlate with estimates that we have been working on independently. The disparity between the storage provided by the C43 WBR and the storage actually needed is one reason we have raised issues in the past about the cost effectiveness of the C43 WBR. The reservoir as it is designed would address only about 15% of the problem flows.

This experience in prior modeling efforts and their outcomes reinforces our continuing concern with the model assumptions used in the development of this plan. There are a number of very optimistic assumptions in this evaluation that will not be reflective of conditions in the near term and thus may continue to underestimate storage and treatment needs and over estimate nutrient reductions and flow optimization.

The modeled plan reflects significant water quality, quantity and flow improvements with nutrient reductions of 38% total nitrogen and 39% total phosphorus, reductions in high and low flow exceedence and an 84% improvement in achieving target flow distributions.

Unfortunately, the model assumes that all Lake Okeechobee Phase II projects, as well as the Caloosahatchee WBR and phase II water quality treatment are constructed and operational, it assumes that Lake Okeechobee discharges meet the 40 ppb TMDL for phosphorus and uses the old Lake Okeechobee regulation schedule -WSE- that allowed much more water to be stored in the Lake than the current LORS schedule allows. Given that these conditions will most certainly not be met during Phase I of the plan - that extends to 2012- and most likely will not be met by Phase III in 2018 we feel that these assumptions skew the outcomes to reflect benefits that will not be able to be realized.

Another problem caused by the optimistic but unrealistic assumptions in the modeling is that it may cause some alternative projects to be passed over because they would not achieve the reductions of Alternative 4 when evaluated in existing conditions. In other words, the modeling that has been done represents the best possible case for restoration. For comparison we recommend that alternative 4 be modeled with current conditions and the LORS regulation schedule to reflect more realistic conditions from which management decisions can be made.

Recommendations

In addition to the above model run adjustments we would request the following projects and considerations be added to the plan.

To meet the plan goal of pollutant source reductions we recommend a dedicated effort to address the **Disston Island Conservation District**. A large portion of this area is located on or adjacent to US Sugar land and is adjacent to Lake Okeechobee and can be redeveloped into water storage and treatment systems thereby eliminating a major source of pollutant loading while providing distributed storage needed in the Caloosahatchee watershed. We urge the District to not swap this land away under the US Sugar land purchase and that plans be developed to create STA and storage in this area to treat water from Lake Okeechobee and the watershed.

We highly recommend the addition of the **Caloosahatchee Alternative Riverway Betterment Plan** to the list of projects. This plan incorporates and connects Disston Island, Lake Hicpochee, BOMA and the C43 WBR into a multi-use, multi-function riverway system that can be created with much lower costs than traditional reservoir or STA systems. In addition, it has the potential for urban redevelopment of the inland Counties as well as ecosystem services.

The cost of northern everglades restoration will restrict the number of engineered projects that we will be able to build. We encourage your active evaluation of alternatives that engage and utilize natural system components to achieve storage treatment and restoration.

On the regulatory front we would recommend strengthening permitting requirements for both water quality and quantity by mandating BMP's in all permits and setting stringent pollution load reduction goals (PLRG) and mandating Low Impact Development features in all permits.

As the Caloosahatchee restoration moves forward we encourage your commitment to restoration projects in all basins using the least amount of infrastructure that requires ongoing maintenance and operation cost to achieve the greatest return.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Rae Ann Wessel", with a large, looping flourish at the beginning.

Rae Ann Wessel
Natural Resource Policy Director
Sanibel Captiva Conservation Foundation