



October 22, 2007

U.S. Army Corps of Engineers
ATTN: CECW-P (IP)
7701 Telegraph Road
Alexandria, VA 22315-3860
Submitted by email: CRWBSRComments@evergladesplan.org

Re: Caloosahatchee River (C-43) West Basin Storage Reservoir Project PIR

To Whom It May Concern:

This letter is submitted on behalf of the Sanibel Captiva Conservation Foundation to provide comments on the Caloosahatchee River (C-43) West Basin Storage Reservoir Project PIR.

The project is touted as integral to achieving ecosystem restoration in the Caloosahatchee estuary. However, the stated restoration goals will only be approximated if water quality is improved *together with* restoration of more natural, historic flows. Achieving ideal flows and salinity conditions with existing water quality will not address the central problem of restoration which includes water quality too poor for restoration of seagrass, bivalves and invertebrates in the aquatic system. Any effort must be twofold, addressing water quality *and* flow from Lake Okeechobee to the estuary. While this project may offer some limited improvements and estuarine benefits to the Caloosahatchee from management of excess flows, we are gravely concerned that it does not address the seriously degraded water quality and thus provides a limited cost/benefit improvement.

The project is promoted to reduce wet season high volume flows a portion of the time. In practice, the modeling based on the period of record through the year 2000, projects flow improvements of only 15 percent, with both high and low flows outside the desirable range approximately 25 percent of the time.

Over the past 12 months the water quality in the test cells was monitored revealing deteriorated water conditions as the concentration of algae in the test cells exceeded that of the river. The drought experienced this past season provided the conditions contemplated for operation of the reservoir; where discharge of water from the reservoir to the river would be needed to meet minimum flows and levels. Unfortunately, the deteriorated water quality precluded the release of water.

Test cell modeling highlights the limitations of the reservoir to reduce nitrogen and phosphorus. This points to the critical need for a water quality/nutrient load reduction component. The current plan proposes this component be constructed in Phase II. However, it is clear from the past years trial that a water quality component needs to be constructed and placed into service at the same time as the reservoir to protect water quality and in conjunction with the TMDL currently being developed for the estuary.

There are additional concerns that the flows from the reservoir may not be delivered to the Caloosahatchee but could be captured to meet agricultural and irrigation needs of users with consumptive use permits using water from Townsend canal, thus undermining the premise and benefit anticipated by the project.

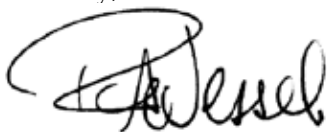
Considering the 2006 project cost of \$507 million we question the cost effectiveness of the project considering the modest improvements to estuarine flows and lack of demonstrated water quality improvement. At this level of investment and water valuation, it may be cost effective to enter into water farming contracts with large landowners in the basin for storing the balance of the excess flows that will remain even after the construction of the reservoir. We encourage the Corps to consider such options to address the volumes of water beyond the scope of the current C-43 reservoir project.

We are additionally concerned about management issues related to the project. We are concerned that we may be creating mini Lake Okeechobee's throughout the landscape with many of the same management concerns. The primary purpose of the C-43 project is to provide for storage and treatment of excess flows, not to provide recreational uses. We are concerned that management of the system for recreational purposes will conflict with and may undermine the primary purpose and function of water management for the natural system. Additionally, given the costs of management for recreational purposes we believe it is incompatible to propose recreational uses at this time. Eventually, should the management and regulation of the primary functions be met, recreational uses could be reconsidered.

There is broad agreement that we cannot store our way out of the problem to address the systemwide needs of the greater ecosystem. While the C43 project provides some limited benefits, we believe that the real solutions to excess flows and water quality require restoration of the Kissimmee water table by retaining higher water levels in the Kissimmee valley and restoration of flows south out of Lake Okeechobee. An operational consideration that we would ask the Corps to consider is changing the vertical lift gates on the dam structures that feed water out of the lake to eliminate the sediment loading to the river. Gates that deliver water from the middle of the water column or surface of the lake would provide flows without the nutrient loading

Thank you for your consideration and the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rae Ann Wessel". The signature is fluid and cursive, with a large loop at the beginning.

Rae Ann Wessel, Natural Resource Policy Director
Sanibel Captiva Conservation Foundation