Audubon OF FLORIDA

444 Brickell Avenue
Suite 850
Miami, FL 33131
Phone (305) 371-6399
Fax (305) 371-6398

March 28, 2008

Catherine Byrd, Planning Division
U.S. Army Corps of Engineers
701 San Marco Boulevard
Jacksonville, Florida 32207
Via email to <Catherine.L.Byrd@usace.army.mil>

Dear Ms. Byrd:

Audubon of Florida submits these comments in response to the U.S. Army Corps of Engineers' (Corps), "Environmental Assessment: WCA-1 and WCA-2A Temporary Deviation to Regulation Schedule" (EA). The deviations were requested by the South Florida Water Management District (SFWMD) to allow continued water supply deliveries should: 1) water levels in Water Conservation Areas (WCA) 1 and 2A drop below the lower line of their regulation zones and 2) the WCAs cannot be re-supplied with water from another source. Audubon recognizes the SFWMD's need for flexibility in its water management operations during this severe drought.

The Corps' EA, and the SFWMD's Ecological Analysis[1], adequately addresses the environmental risks of the alternatives and specified outcomes. The recommendations to manage and minimize drought effects within the WCAs also appear sound. While we concur that Alternative 2 is the least likely of the three alternatives to cause substantial environmental harm, it is difficult to determine whether Alternative 2 offers the best "balance" between competing water supply and environmental needs. The EA, and the SFWMD letter requesting the deviation[2], contain little information on drought-related water supply demand and management strategies. The deviation request process could be significantly improved by providing an analysis of proposed water management strategies should a deviation be implemented.

For WCA-1 (hereafter labeled the "Refuge"), proposed minimum lines would be 11, 12.5, or 10 feet, for Alternatives 1, 2 and 3, respectively, compared with 14 feet under the current regulation schedule. For WCA-2A, all three alternatives would lower the minimum level from 10.5 to 10 feet. The deviations would only be used if necessary and adequate rainfall could preclude their use altogether.

[1] Rutchey, K., J. Godin, M. Cook, J. Maxted, S. Hohner, and M. Kobza. 2008. Ecological analysis for potential WCA-1 and WCA-2A deviations. Everglades Division, SFWMD. West Palm Beach, FL.
[2] December 7, 2007.

As noted previously, the EA and SFWMD's supporting ecological analysis did a reasonable job of modeling and predicting most environmental impacts[3,4]. Considering water levels in the WCAs are presently above their regulation schedules, there is a high probability that the deviation will not need to be implemented. Conversely, extremely dry weather could lower water levels in the Refuge enough to create more harmful impacts than expected. (For example, we are particularly concerned about impacts to the endangered snail kite, whose population has plummeted in the last decade.) In such a scenario, there would be no remedy to end the harmful conditions except "hope for rain." Thus, the deviation, while prudent for the SFWMD to meet their missions, also poses some level of risk for long-term, and possibly permanent damage (i.e. muck fires), to the resources.

The EA and supporting ecological analysis made several good recommendations on managing the drought within the confines of the WCAs. However, the rates, timing, and total volumes of water supply withdrawals are important factors in the resulting impacts to the resource. An analysis of how the water in question will be managed is essential to determine if a "balance" between competing needs will be reached.

Specifically, the EA would be greatly improved if it contained the following information:

1. Expected water supply shortfalls under the alternatives;
2. Potential impacts of those shortfalls (e.g., economic impacts, likelihood and consequences of salt water intrusion of wells, etc.); and
3. A description of management actions to reduce withdrawals to the extent practicable (perhaps including a phased rationing approach linked to the severity and length of the drought).

We defer to the Corps to decide if this information is most appropriate as section of the EA, or as an appendix written by the SFWMD.

Thank you for the opportunity to submit these comments on behalf of Audubon of Florida. Please contact me to discuss any of these issues further.

Sincerely,

Signature waived to expedite delivery

Jacqueline C. Weisblum
Everglades Team Leader
Audubon of Florida

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[3] The EA would benefit by adding an analyses of how much soil would be lost in various scenarios and include estimates of CO2 release. Muck fires rapidly oxidize organic soils. Drying also oxidizes them, just at a slower rate. Decomposition of organic soils is a significant contributor to global warming, thus worthy of inclusion.

[4] We also recommend the EA examine the issue of whether the deviation and related water management alterations will have negative impacts on the hydrology and health of WCA-3, the normal recipient of WCA-1 and WCA-2 water.