



P.O. Box 2627, Stuart, FL 34995

772-225-6849

TO: Rick Smith, WRAC Facilitator
FROM: Leon Abood, Chairman Rivers Coalition
DATE: December 10, 2007
RE: Draft Northern Everglades Plan

Dear Mr. Smith:

Members of the Rivers Coalition have reviewed the Draft Northern Everglades Plan and offer the following comments:

The Plan repeatedly errs by stating the St. Lucie Estuary requires 350 cfs base flow of freshwater. The only freshwater base flow required for our estuary is at the Gordy Road structure on 10 Mile Creek, and it is addressed in the IRL Plan. The IRL Plan will also be providing additional freshwater to the estuary in order to bleed down storage areas, providing more freshwater than we want or need, but attempting to balance salinity with local basin waters.

Please remove all reference to providing St. Lucie Estuary base flows from the "Northern Everglades", we do not need it, there is no scientific evidence for the Estuary needing it, or in fact ever receiving it from the "Northern Everglades". The less interaction we have with waters from the Northern Everglades Plan the better off we will be.

The Plan also errs in stating that the St. Lucie Estuary can tolerate up to 2000 cfs freshwater discharge and up to 3000 cfs when necessary (for management of Lake Okeechobee). This is totally untrue absent qualification regarding the duration of flows. 2000 cfs from S-80 for 10 days turns the estuary fresh to below the Roosevelt Bridge. 2000 cfs for two months kills immobile estuarine species. 3000 cfs is worse.

Please be honest enough in the Plan to state the obvious: any discharge from the Northern Everglades Planning area to our Estuary is at best undesirable and at worst, destroys the Estuary.

SFWMD persists in planning pieces of the system as though they were independent of one another. Including a small part of the EAA in the "Northern Everglades" Plan provides the EAA the implied drainage and water supply benefits of the Plan but none of the responsibility for conveyance of excess waters south to what remains of the Everglades.

The same deliberate error was made in CERP, when project planning from south to north stopped at Lake Okeechobee. At that time the Lake was treated as a “black box” from which water resources were derived, with the excess dumped and wasted to the ocean in immense quantities (more than 850 billion gallons in '05). Now SFWMD is planning the Northern Everglades and Lake O, and the coastal estuaries are the “black box” into which excess water must be dumped.

Any plan for significant water storage and flows in South Florida must include all the parts. Hiding the EAA in the middle of system and then claiming to protect the surrounding natural resources the EAA degrades for its perfect drainage and water supply is absurd. The Lake requires a third major outlet south. Continuing to ignore this imperative dooms the Northern Everglades Plan, and CERP, to failure.

Sincerely,

Leon Abood, President
On Behalf of the Rivers Coalition Defense Fund Board of Directors

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