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May 20<sup>th</sup>, 2014

Florida Fish and Wildlife Conservation Commission  
Farris Bryant Building  
620 S. Meridian St.  
Tallahassee, FL  
32399-1600

Commissioners:

As you may know, the Rivers Coalition is made up of over 70 organizations representing over 300,000 members that care deeply about the natural resources of the state of Florida, including the regionally significant Wildlife Management Areas (WMAs); many of our members are avid fishermen and hunters.

We are writing in support of sending water from Lake Okeechobee to the Holey Land WMA in order to rehydrate the area, thereby minimizing the potential for destructive fires. Public funds were expended to re-create flow-through hydrologic conditions in the Holey Land, however, the amount of Lake Okeechobee releases sent through these public lands have decreased significantly over the last 20 years. In 2013, no Lake releases were sent to the Holey Land despite dry conditions during the winter and spring. We understand that in 2007 the area dried out so badly that a wildfire ravaged over 13,000 acre of this remnant Everglades marsh. The 2013 *South Florida Environmental Report* documented the continued ecological degradation of the Holey Land due to insufficient flow-through hydrology.

We observed that water depths in the Holey Land have declined below ground level during the current dry season, despite unusually high water levels during the summer and fall of 2013. We noted that the South Florida Water Management District (District) reported that your agency "is in the process of closing it to public access because of low water conditions and high recession rates."

It is our understanding that by utilizing the existing District structure G-372HL about 250 cfs can be delivered to the Holey Land. It is our understanding that this amount is about the same as the average evapotranspiration rate for the area, and as such will not create deep water conditions in the area.

We urge the Commission to work with the District to utilize water from Lake Okeechobee to prevent the further ecological degradation of the Holey Land. In fact, the Everglades Forever Act (EFA) of 1994 states that “the Everglades Program will contribute to the restoration of the Rotenberger and Holey Land tracts. The Everglades Construction Project provides a first step toward restoration by improving hydroperiod with treated water for the Rotenberger tract and by providing a source of treated water for the Holey Land.” The stated intent through the EFA is restoration of Holey Land. We urge the state of Florida to connect the acknowledgement that Holey Land suffers ecologically from insufficient flow with the reality that more can be done to improve those flows.

To be clear, we are not advocating the use of the Holey Land for deep water storage, nor as a treatment area for stormwater runoff from the EAA. We do however feel that the use of Lake water can help the state achieve the hydroperiod restoration goals of the Holey Land and at the same time reduce the risk of destructive Lake releases to the estuaries.

We understand the fear of using water containing nutrient levels above the phosphorus criterion for the Everglades. However, operational experience and research in the adjacent Rotenberger WMA indicate the ecological benefits of restoring flow-through conditions using water above 10 ppb are more beneficial than the ecological harm caused by continued dryout conditions.

Please let us know if you have any questions.

Sincerely,

Leon Abood, Chairman  
Rivers Coalition

CC:

Senator Joe Negron  
Kevin Powers, Vice Chair SFWMD  
Representative MaryLynn Magar