



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

August 17, 2015

South Florida Water Management District
CFWI Comments
Attn: Dean Powell
Water Supply Bureau
3301 Gun Club Road
West Palm Beach, FL 33406

RE: Draft Regional Water Supply Plan & 2035 Water Resources Protection and Water Supply Strategies Plan

Dear Mr. Powell:

The United States Department of the Interior (Department) appreciates the opportunity to comment again on the draft *Central Florida Water Initiatives (CFWI) Regional Water Supply Plan* and to provide initial comments on the draft *CFWI 2035 Water Resources Protection and Water Supply Strategies Plan (Protection and Strategies Plan)*. In the Department's February 2014 comment letter, the Department stated its concern that the CFWI Regional Water Supply Plan Projects, including a proposed reservoir project in the Upper Kissimmee Basin, will erode the considerable federal and state investment in Kissimmee River Restoration, and further negatively impact the federally endangered and threatened species located in the Upper Chain of Lakes and the Kissimmee River and Floodplain.¹ Due to this concern, the Department recommended that the South Florida Water Management District (SFWMD) adopt a reservation for the Upper Chain of Lakes, Headwaters Revitalization Lakes, and the Kissimmee River and its Floodplain before implementing any surface water projects in the Upper Kissimmee Basin. We are pleased that the CFWI is following the recommendation of the Department and is not proposing to plan or implement surface water projects in the Kissimmee Basin until the SFWMD develops a reservation for the protection of fish and wildlife. The Department is actively involved with the SFWMD and other stakeholders in developing the Kissimmee Basin reservation and commented on the draft reservation on May 8, 2015.²

In its 2015 reservation comment letter the Department stated its additional concern that future consumptive use projects in the Upper Kissimmee Basin will have a negative effect on the considerable

¹ The Department's 2014 letter is attached and made a part hereto and incorporated by reference; the letter contains a list of federally endangered and threatened species and state species of special concern and threatened species located in the Upper Kissimmee Basin. The 2014 letter also describes the Upper Kissimmee Basin Planning Area as including the site of the United States Fish and Wildlife Service's (Service) recently established Everglades Headwaters National Wildlife and Conservation Area.

² The Department's 2015 reservation comment letter is attached and made a part hereto and incorporated by reference.

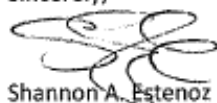
state and federal investment in Everglades Restoration by allocating to consumptive use water necessary for the Comprehensive Everglades Restoration Project (CERP). The outflow of surface water from the Kissimmee Chain of Lakes is to the Kissimmee River; the Kissimmee River is the largest tributary to Lake Okeechobee, accounting for approximately 50% of inputs. Water moving south from Lake Okeechobee is crucial to rehydrating the remnant Everglades.

The draft *Protection and Strategies Plan, Chapter 3: Solutions Plan Projects* contains a project, the Grove Land Reservoir and Stormwater Treatment Area (Grove Land), which is neither mentioned in the *CFWI Regional Water Supply Plan* nor located within the CFWI Planning Area. The *Protection and Strategies Plan* describes the Grove Land Project as having the potential to provide a variety of benefits, including surface water augmentation, groundwater recharge, and nutrient reduction. Grove Land is described as a 5,000-acre reservoir, 2,000-acre Stormwater treatment area (STA), intake/discharge structures, conveyance improvements, and other associated facilities. It is stated that the reservoir water would be supplied from excess stormwater runoff captured from the C-25, C-24, and C-23 basins via the C-25, C-24, and C-23 Canals, which are owned by the SFWMD. The project has been conceptually designed to deliver 136mgd. It is further stated that the project is technically feasible as long as sufficient water supply can be legally supplied from the C-25, C-24, and C-23 Canals.

The C-25, C-24, and C-23 Canals are part of the United States Army Corps of Engineers (Corps) Central and Southern Florida (C&SF) Project. Water captured from the C-25, C-24, and C-23 Canals is planned to supply the above-ground reservoirs in the Indian River Lagoon (IRL) (C-44) – South CERP Project.³ It is unclear whether Grove Land is in conflict with the CERP Project and whether the CFWI is supporting the Grove Land Project as part of the CFWI Planning. The Department requests that these questions be clarified.

Thank you for the opportunity to provide comments. I and my staff are available for any follow-up discussions that the SFWMD and/or CFWI may want to convene. If you have any questions regarding this letter, please contact me or Joan Lawrence at 786-390-8087.

Sincerely,



Shannon A. Estenoz
Director, Everglades Restoration Initiatives
United States Department of the Interior

³ The IRL – South Project was approved by Congress in 2007 and is expected to include, in part, the following components:

- Construction and operation of four new large-scale above-ground reservoirs and their connecting canals, control structures, levees and pumps to capture water from the C-23, C-24, C-25, and C-44 Canals for increased storage. A total combined new water storage of about 130,000 acre-feet (44 billion gallons) of new storage.
 - Construction and operation of four new STAs (combined area of about 9,100 acres), one for each C-23/C-24 North, C-23/C-24 South, C-25, and C-44 basins, to reduce sediment, phosphorus, and nitrogen entering the St. Lucie Estuary and the IRL.
 - Construction is underway on the C-44 Reservoir and STA.
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