February 22, 2005

On Letterhead

Mr. Steve Roth, P.E.
CERP Senior Project Manager
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33416-4680

Dear Mr. Roth,

Thank you for providing members of the public with an opportunity to review and comment on the C-43 West Storage Reservoir Basis of Design Report. While only a few members of the Watershed Council have had an opportunity to read through the entire report, we have discussed it at two meetings and would like to offer the following comments and observations on the project.

- Although we understand that the Acceler8 program calls for accelerating the funding, design and construction of this project, we are concerned that the report on alternatives to the planned project will not be issued until June. It seems premature to move forward with design until there is agreement that the reservoir will significantly address the stated objectives of the project (to improve the timing, quantity and quality of flows to the Caloosahatchee River estuary) and that alternatives can (and will) be employed to completely achieve the objectives.
- We are troubled that concerns about water quality issues are not being adequately addressed. A very important opportunity will be lost if the system is not designed to improve water quality to meet Class II conditions at discharge. The Florida Department of Environmental Protection has identified significant impairments in waters of the Caloosahatchee basin since this project was initiated. In describing the C-43 Basin Storage Reservoir project in the Final Feasibility Report and PEIS issued by the US Army Corps of Engineers in April of 1999, it is acknowledged that "this facility could be designed to achieve significant water quality improvements, consistent with appropriate pollution load reduction targets." We urge you to incorporate water quality improvements into both the project purpose and design.
- We believe the historical flow assumptions that are being used to determine how much water the estuary needs are flawed. Records exist going back to the 1940's, but modeling work has been based on no more than a 36 year time period.
- We would like to see a distillation of the design that clearly shows the dollar cost per 1,000 gallons of improvement below 300 cfs and above 2,800 cfs. This would enable us to understand the benefits at the low and high end of flows, but…
- Significant questions about the predicted performance of the system remain unanswered. For example, during a 1 in 10 drought period what percent of the time will flows be within the desired range of 500 to 2800 cfs? Similarly, what percent of the time will high flows be within the acceptable range? Only until we can quantify the improvements can the cost effectiveness of this project be effectively evaluated. And that is something that the citizens of this region, and all the taxpayers who will foot the bill for this project, deserve to be able to quantify

Thank you for your consideration of these points.

Sincerely,

Matt Fisher
Chairman