

**AUDUBON OF FLORIDA  
EVERGLADES FOUNDATION  
NATIONAL PARKS CONSERVATION ASSOCIATION  
WORLD WILDLIFE FUND**

September 27, 2007

Ms. Carol Wehle  
Executive Director  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, Florida 33406

Re: Seasonal Canal Operations in South Miami-Dade

Dear Ms. Wehle:

As noted on the South Florida Water Management District's (District) website, "We are experiencing one of the worst droughts on record." Rainfall over Lake Okeechobee and the Kissimmee basin has been disturbingly low and spotty over other parts of the District's planning region. The unprecedented low water levels in Lake Okeechobee and large rainfall deficits across the interior and west coast areas of south Florida portend water supply problems even more dire than last year. You have taken important steps already, including the mandatory water restrictions in effect in some areas since March 2007, and year-round conservation requirements now under consideration.

We know that every step taken to conserve water contributes to getting us through what will be a very serious environmentally and economically stressful time. Therefore, we offer for your consideration a proposal to save water in Miami-Dade County, improving water supply for hundreds of thousands of residents and protecting sensitive wetlands and Biscayne Bay. The operational rules for the C&SF Project allow the District to lower water levels at the end of the wet season in the coastal structures, and the District typically does so. We suggest that the District use their operational discretion, take into account the regional drought, and forego these drawdowns, saving an estimated 28,000 acre-ft of fresh water.

Specifically, we believe that field conditions warrant suspension of Low Range operation criteria, for the period October 15<sup>th</sup> through December 30<sup>th</sup> at control structures S-21, S-21A, S-20F, S-20G, and S179, which regulate water levels within the L31E, C-1, C-102, C-103, and Military Canals. We recommend continuation of wet season or High Range operation criteria for these coastal structures. We also recommend increasing stages in the South Dade Wetlands (Model Lands) region by raising the S-20 open trigger by 0.5 ft above existing condition, such that the operating stage is 2.9 ft.

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We believe that not lowering canal stages an average of 0.5 ft allows for the retention of roughly 28,000 acre-feet within a 56,000 acre drainage area without adverse impacts to agricultural operations (see attached figure). Almost all of the agricultural operations in these eastern basins are nurseries, not row crop operations, and do not require a drawdown. Suspending the fall season drawdown will not harm any user, and will provide measurable long-term benefits (that is, carry over to the dry season) to local water users as well as to the natural system, including Biscayne Bay and associated coastal wetlands.

Thank you for your consideration in this matter.

Sincerely,

/signatures waived to expedite delivery/

David E. Anderson  
Executive Director  
Audubon of Florida

Sara Fain  
Everglades Restoration Program Manager  
National Parks Conservation Association

Betty J. Grizzle, D.Env.  
Scientist  
Everglades Foundation

Debra Harrison  
Director, South Florida Program  
World Wildlife Fund

Attachment

