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From: FARRELL, Chris

Sent: Monday, January 10, 2005 3:47 PM

To: 'sfwmd.gov'

Subject: Pre-CERP Baseline Document Comments - Audubon of Florida

Comments from Audubon of Florida on the Pre-CERP Baseline

The document should clarify which assumptions represent actual conditions from 2000 and which assumptions represent some other condition. This is not clear from the existing descriptions of many assumptions. For example, the assumptions for the Seminole Brighton Reservation state, "Demands are in agreement with the entitlement quantities as per Table 7, Agreement 41-21 (Nov 92)." It is not clear if this represents demands in 2000.

For any assumptions that do not represent actual conditions in 2000 it is important to explain why they were used and any differences that they might create in the model runs (compared to using the actual 2000 conditions).

Section 7.4.1 states that the pre-CERP baseline will be simulated using the latest models. This may produce different versions of the per-CERP baseline conditions and could potentially lead to confusion or other controversy. The IMC or RECOVER may want to draft some guidelines discussing "best practices" concerning model updates, the use of simulations from the updated models, and how they should (or should not) be used in conjunction with previous simulations. Also, it would be useful to have a more thorough explanation of the statement that "project determinations with respect to the Savings Clause will not be retroactively affected by an updated pre-CERP baseline."

Finally, even though this comment applies mainly to the guidance memoranda, we will repeat it here due to its importance. The savings clause protects existing sources from impacts due to implementation of the CERP. The "baseline" water is not explicitly protected, however, from actions outside of the CERP. The baseline water must be reserved by the state and protected as a foundation for future restoration projects. The current draft of the guidance memoranda document only requires a reservation of the "additional" water provided by the project. All of the water required for restoration should be reserved by the state, and the Pre-CERP Baseline should be used to set the initial reservations.

Please contact me if you have any questions.

Thank you,

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