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Subject: Master Implementation Sequencing Plan

Date: January 10, 2005

Dear Mr.Redican,

The Nature Conservancy has reviewed the Master Implementation Sequencing Plan (MISP) and recommends the following changes.

Recommendation: Include entire Indian River Lagoon South project in Band One.

The Nature Conservancy is concerned about the placement of natural lands acquisition in Band Four and advises that it be re-assigned to Band One. The project provides significant ecological benefits but may not be able to be implemented at all if acquisition is delayed so long.

The entire project provides significant ecological benefits

The completed and approved Indian River Project Implementation Report describes the natural values of this project:

"Establishing this land as a natural storage and treatment area is consistent with the ecological enhancement goal for the Comprehensive Everglades Restoration Plan (CERP) by increasing the spatial extent of functional natural areas, improving habitat and functional quality, and improving native plant and animal species abundance and diversity. The size of the project and its proximity to other public natural areas establishes a wildlife corridor, or greenway, that is considered critical to reestablishing diverse wildlife populations of some keystone and threatened and endangered species."

When over-drained pasture with remnant habitat and wetlands is restored by removing the artificial drainage and applying fire management and exotic control, it provides important natural storage and greatly reduces the amount of nutrients and other pollutants

leaving the property. Reservoirs can only attenuate flows while continuing to release unnatural volumes while restored natural areas can decrease annual volumes of runoff to a more natural level.

Natural water storage is important to the entire system because of the uncertainty of the Acquirer Storage and Recovery (ASR) technology and should therefore be maximized in restoration planning wherever possible.

The land to implement the natural areas component of the Indian River South project will be unavailable in 2020.

Waiting until Band four (2020-2025) to contemplate implementation of the natural lands component of IRL will almost certainly result in the loss of that land to development pressure.

This is one of two CERP projects that has a completed Project Implementation Report (PIR) and is ready to be submitted to Congress for authorization. The project is a mix of 150,000 acre feet of built and natural water storage and treatment areas, 30,000 of which is provided from the natural lands portion. The project is estimated to achieve phosphorus reduction of 20,800 kg/yr. It is a model of restoration planning and should be implemented fully. The overall project will certainly not meet its goals if the natural lands components are lost by sequencing that almost ensures they will be forfeited to development.

Recommendation: The MISP should reflect a commitment to flexibility between federal and non-federal partners regarding funding strategies.

Section 6.1.4 Draft MISP The funding discussion in the MISP draft document acknowledges that while land acquisition remains the responsibility of the District, the demands of the Acceler8 program may make it difficult to proceed with non-Acceler8 projects. This is apparently the basis under which the Indian River South properties were assigned Band Four priority.

The Conservancy remains supportive of Acceler8, but urges the state and federal partners to remain flexible in program responsibilities for land acquisition. Partners should consider the reduced burden on the federal partner because of Acceler8 and leave open the possibility of engaging in a funding partnership for critical land acquisition like the IRL-South natural lands.

This is already envisioned in the PIR for the IRL-South project which suggests the Wetlands Restoration Program (WRP) provided through the U.S. Department of Agriculture (USDA) as authorized in the Farmland Security and Rural Investment Act of 2002 (i.e., 2002 Farm Bill) as a funding source for much of the land in this area. Just as Section 6.1.4 of the MISP acknowledges the constraints upon project implementation

because of Acceler8, it should also explicitly emphasize flexibility between federal and non-federal partners in the acquisition of lands critical to CERP implementation

Recommendation: Move Lake Okeechobee Watershed project that provides water storage north of Lake Okeechobee to Band One.

The effort to maximize water storage north of the lake through the acquisition and restoration of isolated wetlands should not be jeopardized by a delay of six years. The Central Project Development Team is currently working on design alternatives for the Lake Okeechobee Watershed (LOW) Project. The restoration of wetlands in this region has long been a goal and recommendation of agency projects. As cited in the Draft Alternatives Report for LOW, "restoring historic wetlands in the LOW was not only recommended by the Restudy (Corps, 1999) but is also consistent with the recommendations of the South Florida Ecosystem Restoration Working Group's Lake Okeechobee Issue Team and the Pollution Load Reduction Goals for Lake Okeechobee developed for the Lake Okeechobee Surface Water Improvement and Management Plan (SFWMD 1997). Restored wetlands in the LOW are expected to contribute towards the overall water quality restoration objectives and provide significant long-term water quality benefits for Lake Okeechobee."

Protection, through fee or easement acquisition, could add significant benefits for habitat, water storage and reduction of phosphorus in the watershed. Again, uncertainties surrounding the ASR technology make natural lands storage of water critically important. While the project is not yet through the planning process, it certainly will be before the expiration of Band One. With land prices soaring in South Florida and speculative development accelerating, all land acquisition strategies need first priority rankings.

Thank you for the opportunity to comment on the Master Implementation Sequencing Plan

Sincerely,

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The Nature Conservancy

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