



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

February 19, 2014

Tom Bartol
St. Johns River Water Management District
4049 Reid Street
Palatka, FL 32177

Re: CFWI Regional Water Supply Plan

Dear Mr. Bartol:

The United States Department of the Interior (Department) appreciates the opportunity to comment on the Central Florida Water Initiatives (CFWI) Regional Water Supply Plan. The Department has recently learned that the South Florida Water Management District's Kissimmee Basin Water Supply Plan has been divided into the Upper Kissimmee Basin and the Lower Kissimmee Basin Planning Areas, with the CFWI Regional Water Supply Plan as the water supply plan for the Upper Kissimmee Basin Planning Area. The Upper Kissimmee Basin Planning Area of the CFWI includes the Upper Chain of Lakes which feed into the Kissimmee River as well as a portion of the Kissimmee River and its floodplain. The Upper Chain of Lakes include Lake Hart, Lake Mary Jane, Lakes Myrtle, Joel, and Preston, East Lake Tohopekaliga, Lake Tohopekaliga, Cypress lake, Lake Hatchineha, Alligator Lake, Lake Gentry, and Lake Kissimmee.

There has been considerable public investment in restoration of the Kissimmee River. The Kissimmee River Restoration Project is an \$800 Million restoration project to restore 40 square miles of Kissimmee River and Floodplain ecosystem, including almost 25,000 acres of wetlands and 40 miles of historic river channel. Additionally, the Headwater Revitalization Project, which has been combined with the Kissimmee River Restoration Project, involves modifications to Lakes Kissimmee, Hatchineha, Cypress, and Tiger in the Upper Kissimmee Basin to provide the volume of water to the river restoration project necessary to achieve project success. Inflows to the Kissimmee will mimic the historic condition. The secondary purpose is to improve the condition of approximately 7,000 acres of lake littoral wetlands. A greater area of littoral zones of Lakes Kissimmee, Cypress, and Hatchineha will be inundated, creating a greater coverage of littoral wetlands. More than 100,000 acres of land acquisition needed for Kissimmee River Restoration and Headwaters Revitalization is substantially completed. More than \$300 million have already been expended by both the federal government and state of Florida. This restoration project is considered a tremendous success. The river and its floodplain have already improved in remarkable ways, surpassing at times the anticipated environmental response.

The Kissimmee Basin is home to many species of concern (see attached listing) including federal endangered and threatened species and state species of special concern and threatened species. Some of these species are also found throughout the CFWI Planning Area.

Recognizing the need to prevent allocation of water needed for the protection of fish and wildlife, the South Florida Water Management District (SFWMD), on June 12, 2008, initiated Rule development for a water reservation for the Kissimmee River and Upper Chain of Lakes. Waters affected by this rulemaking effort are the surface waters needed for the protection of fish and wildlife as well as the surficial groundwater that affects that surface water. Included in the reservation are the Kissimmee Upper Chain of Lakes (Myrtle-Joel-Preston, Hart-Mary Jane, East Lake Tohopekaliga, and Tohopekaliga to the west;

Alligator Chain and Gentry to the east; and the Kissimmee Group including Kissimmee-Cypress-Hatchineha) and the Kissimmee River and Floodplain.

In 2008, the SFWMD staff anticipated that a final draft rule would be published in June of 2009. In the analysis done to support this reservation, as presented in March of 2009, it was determined that although surface water in excess of the defined fish and wildlife protection targets occurs in some of the lakes in the Upper Chain when looked at on an individual lake by lake scale, there is a lower potential for surface water in excess of the defined fish and wildlife protection targets when looked at on a system wide scale. It was also determined that the Kissimmee River has a low potential for surface water in excess of the defined fish and wildlife targets. A scientific peer review panel found that the modeling was sound, biologic linkages to hydrology were sound, and the approach to defining water for protection of fish and wildlife (performance measures) was sound. However, this reservation was never completed. It appears that work stopped in 2009.

The Upper Kissimmee Basin Planning Area also includes the site of the Service's recently authorized Everglades Headwaters National Wildlife Refuge and Conservation Area (Refuge and Conservation Area) (See attached map). The Refuge and Conservation Area, a high priority for the Department, is an initiative to preserve the natural resources and rural way of life in the Kissimmee River Valley. The Refuge and Conservation Area was authorized to protect 150,000 acres in the threatened wetland, grassland and long-leaf pine savannah landscapes north of Lake Okeechobee, through fee title acquisition and permanent conservation easements on private lands, allowing continued cattle and agricultural production.

The CFWI Regional Water Supply Plan lists several surface water projects including one described in the Appendix as the *Kissimmee River Basin AWS Project* and as being located in the Kissimmee River Basin. The project capacity is listed as supplying up to 25 million gallons per day. The Department has scheduled a meeting with SFWMD staff to learn more about this and the other surface water projects.

The Department is concerned that the CFWI Regional Water Supply Plan Projects 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. Also, given the conclusions reached by the SFWMD reservations analysis, it is unlikely there is any substantial quantity of excess water in either the Upper Chain of Lakes or the Kissimmee River and Floodplain above that required for the protection of fish and wildlife. The Department believes that the SFWMD should adopt a reservation for the Upper Chain of Lakes and the Kissimmee River and its Floodplain before implementing any surface water projects in the Upper Kissimmee Basin. The Department may provide supplemental comments after meeting with the SFWMD staff regarding the surface water projects.

Sincerely,

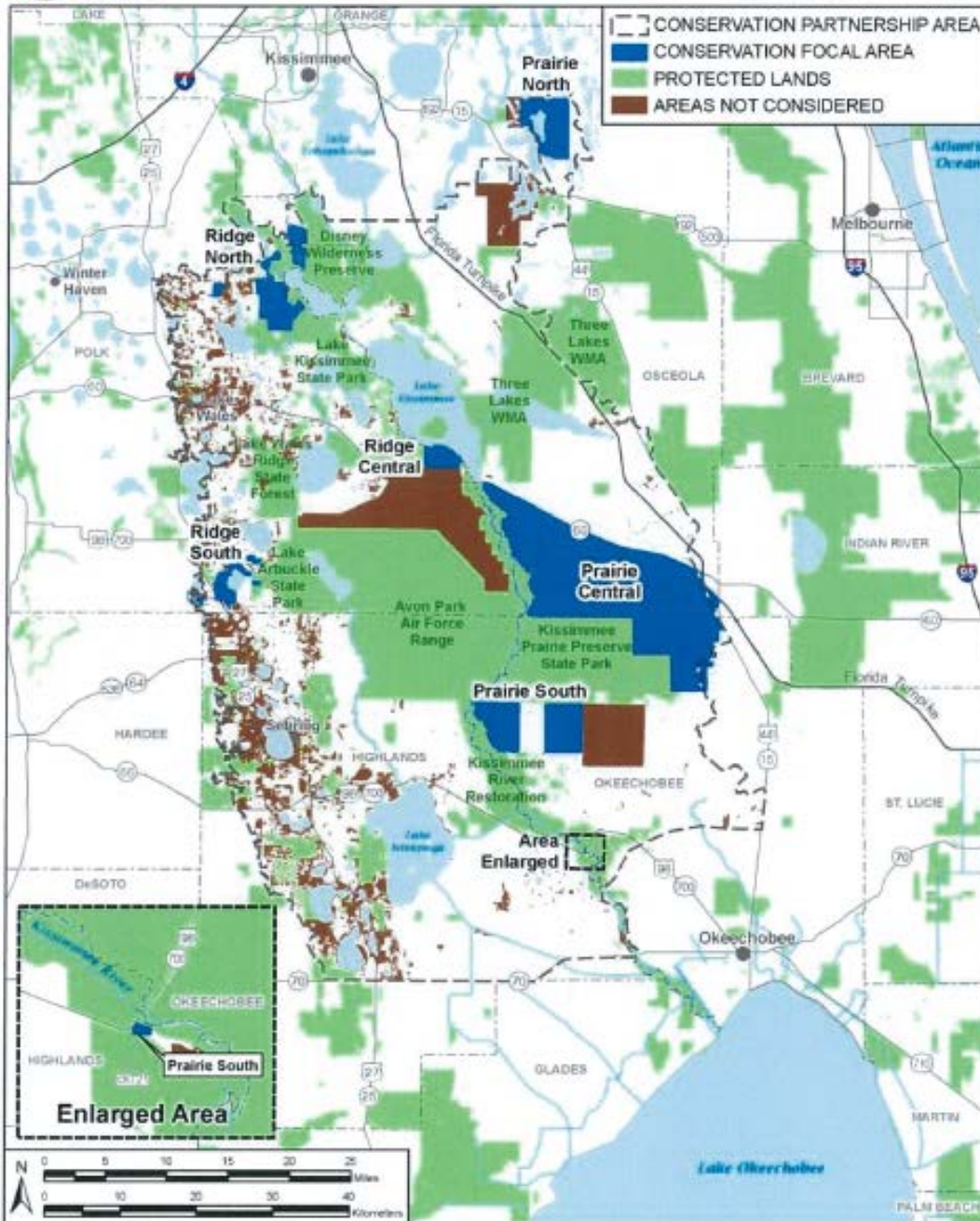


Shannon A. Estenoz
Director, Office of Everglades Restoration Initiatives
United States Department of the Interior



Everglades Headwaters Conservation Partnership
National Wildlife Refuge and Conservation Area Proposal

Alternative C - Parcels - Overview



Species of Concern within the Kissimmee basin.

(E: Endangered, T: Threatened, SC: Species of Special Concern, SA: Similarity of Appearance, Candidate: C, State Threatened: ST)

Common Name	Scientific Name	Status	Agency
Amphibians			
Striped newt	<i>Notophthalmus perstriatus</i>	C	Federal
Gopher frog	<i>Lithobates capito</i>	SC	State
Birds			
Black skimmer	<i>Rynchops niger</i>	SC	State
Burrowing owl	<i>Athene cunicularia</i>	SC	State
Florida grasshopper sparrow	<i>Ammodramus savannarum floridanus</i>	E	Federal
Florida sandhill crane	<i>Grus canadensis pratensis</i>	ST	
Florida scrub-jay	<i>Aphelocoma coerulescens</i>	T	Federal
Everglade snail kite	<i>Rostrhamus sociabilis plumbeus</i>	E	Federal
Audubon's crested caracara	<i>Polyborus plancus audubonii</i>	T	Federal
Limpkin	<i>Aramus guarauna</i>	SC	State
Little blue heron	<i>Egretta caerulea</i>	SC	State
Red-cockaded woodpecker	<i>Picoides borealis</i>	E	Federal
Snowy egret	<i>Egretta thula</i>	SC	State
Southeastern American kestrel	<i>Falco sparverius paulus</i>	ST	State
Tricolored heron	<i>Egretta tricolor</i>	SC	State
White ibis	<i>Eudocimus albus</i>	SC	State
Whooping crane	<i>Grus americana</i>	Experimental Population non-essential	Federal, State
Wood stork	<i>Mycteria americana</i>	E	Federal
Fish			
Lake Eustis pupfish	<i>Cyprinodon hubbsi</i>	SC	State
Insects			
Highlands tiger beetle	<i>Cicindela highlandensis</i>	C	Federal
Lichens			
Florida perforate cladonia	<i>Cladonia perforata</i>	E	Federal
Mammals			
Florida panther	<i>Puma concolor coryi</i>	E	Federal
Florida manatee	<i>Trichechus manatus</i>	E	Federal
Puma	(=mountain lion) (<i>Puma</i> (= <i>Felis</i>) <i>concolor</i> (all subsp. except <i>coryi</i>))	T/SA	Federal
Florida bonneted bat	<i>Eumops floridanus</i>	ST, Proposed Endangered	State, Federal
Florida mouse	<i>Podomys floridanus</i>	ST	State
Homosassa shrew	<i>Sorex longirostris eonis</i>	SC	State
Sherman's fox squirrel	<i>Sciurus niger shermani</i>	SC	State
Reptiles			
American alligator	<i>Alligator mississippiensis</i>	T/SA	Federal
Bluetail mole skink	<i>Eumeces egregius lividus</i>	T	Federal
Eastern indigo snake	<i>Drymarchon corais couperi</i>	T	Federal
Florida pine snake	<i>Pituophis melanoleucus mugitus</i>	SC	State

Gopher tortoise	<i>Gopherus polyphemus</i>	C, ST	Federal, State
Sand skink	<i>Neoseps reynoldsi</i>	T	Federal
Short-tailed snake	<i>Stilosoma extenuatum</i>	ST	State
Plants			
Short-leaved rosemary	<i>Conradina brevifolia</i>	E	Federal
Scrub mint	<i>Dicerandra frutescens</i>	E	Federal
Highlands scrub hypericum	<i>Hypericum cumulicola</i>	E	Federal
Scrub blazingstar	<i>Liatris ohlingerae</i>	E	
Papery whitlow-wort	<i>Paronychia chartacea</i>	T	Federal
Lewton's polygala	<i>Polygala lewtonii</i>	E	Federal
Wireweed	<i>Polygonella basiramia</i>	E	Federal
Sandlace	<i>Polygonella myriophylla</i>	E	Federal
Scrub plum	<i>Prunus geniculata</i>	E	Federal
Florida bonamia	<i>Bonamia grandiflora</i>	T	Federal
Pygmy fringe-tree	<i>Chionanthus pygmaeus</i>	E	Federal
Pigeon wings	<i>Clitoria fragrans</i>	T	Federal
Beautiful pawpaw	<i>Deeringothamnus pulchellus</i>	E	Federal
Scrub buckwheat	<i>Eriogonum longifolium</i> var. <i>gnaphalifolium</i>	T	Federal
Snakroot	<i>Eryngium cuneifolium</i>	E	Federal
Britton's beargrass	<i>Nolina brittoniana</i>	E	Federal
Wide-leaf warea	<i>Warea amplexifolia</i>	E	Federal
Carter's mustard	<i>Warea carteri</i>	E	Federal
Scrub lupine	<i>Lupinus aridorum</i>	E	Federal
Garrett's mint	<i>Dicerandra christmanii</i>	E	Federal
Florida ziziphus	<i>Ziziphus celata</i>	E	Federal
Avon Park harebells	<i>Crotalaria avonensis</i>	E	Federal

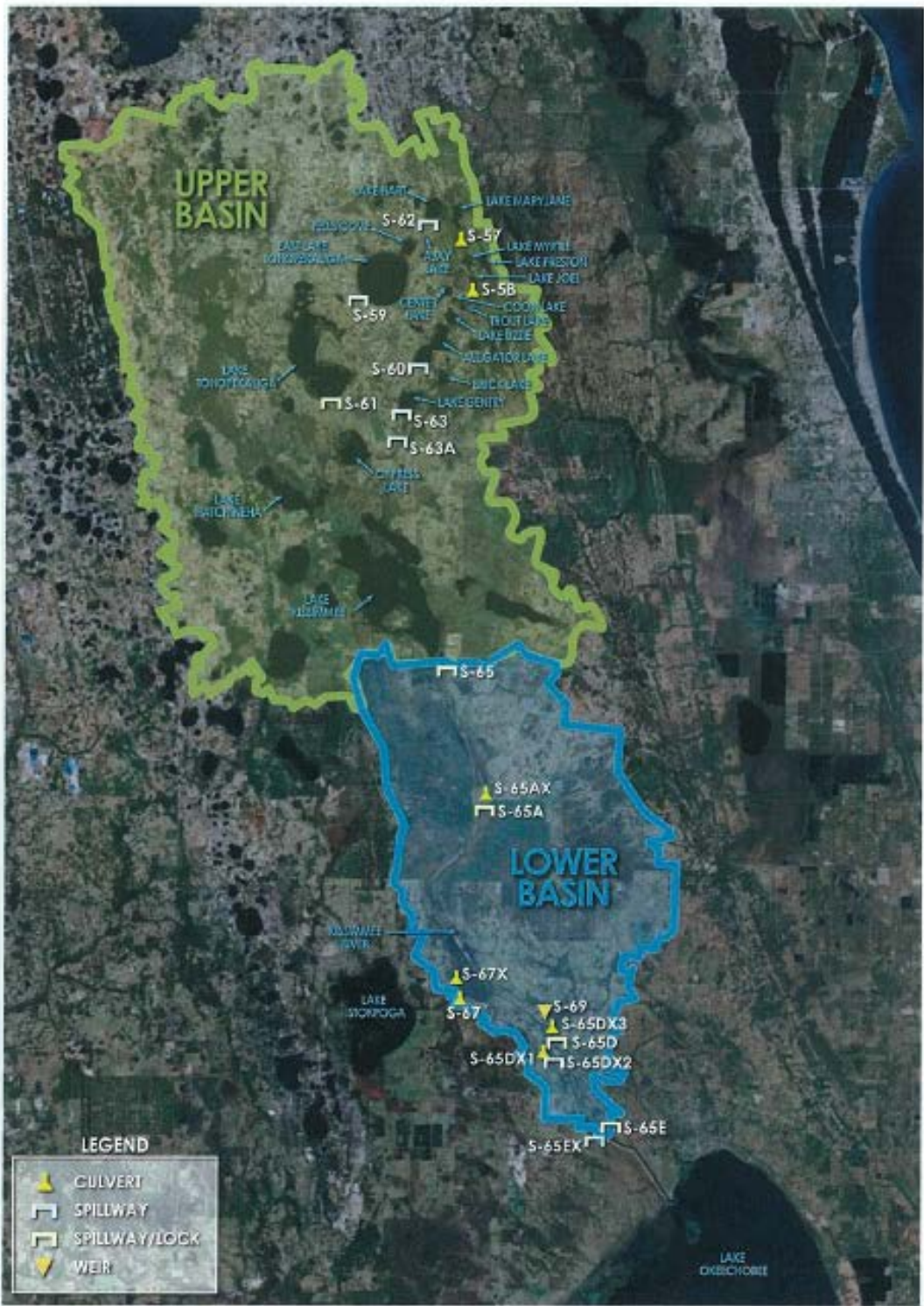


Figure 1 – Kissimmee Basin.