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May 3, 2016

Ann B. Shortelle, Ph.D., Executive Director
St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178-1429

Please disseminate to the SJRWMD Board

Re: Indian River County dispersed water storage/nutrient reduction pilot project

Dear Dr. Shortelle:

After careful review and analysis of the two proposed dispersed water management projects in Indian River County, the Pelican Island Audubon Society ("PIAS") believes that the St. Johns River Water Management District ("District" or "SJRWMD") would be better served by funding projects that provide permanent benefits.

When our organization first learned of the proposed dispersed water management ("DWM") projects in early January, the PIAS made a dedicated effort to learn as much about these specific projects as well as the manner other water management districts were handling DWM projects in their regions. We submitted our first letter on January 31, 2016 requesting information about the projects and the process used to select the awarded properties. In that letter, we sought information on how the proposed projects would benefit the Indian River Lagoon ("IRL") and what other types of IRL oriented projects were considered.

PIAS Board members spoke with District staff about the DWM projects and the District provided a formal response to our questions on February 19, 2016. Based on the available information, our organization had difficulty understanding how the Fellsmere Joint Venture ("FJV") DWM project site would provide additional benefits to the Indian River Lagoon when the site was immediately adjacent to the newly constructed and soon to be online Fellsmere Water Management Area ("FWMA"). Specifically, what water would flow into the FJV DWM project that would not flow into the FWMA once completed? According to the District's website, the FWMA would decrease the frequency of freshwater discharges through the C-54 canal to the lagoon to less than a 1-in-100-year storm event. If the 10,000-acre FWMA was constructed to prevent freshwater discharges from the basin into the lagoon, what benefit would the addition of the 1,600 acre FJV project provide given the proximity of the two projects? We followed up our initial letter with an email to Dr. Sherry Brandt-Williams on March 18, 2016, requesting further clarification on this point. Eventually, we were informed by District Staff that this information was unknown at this time.

Furthermore, PIAS was concerned with the significant expenditure of funds (\$22,500,000.00) on projects that would provide at most ten years' worth of benefits. Our point was twofold: first, how would the benefits of these DWM projects compare to traditional conservation projects (i.e., land conservation through acquisition, perpetual easements protecting natural resources, construction of permanent water improvement projects); and second, did the District consider purchasing the land and then constructing the water resource projects on those properties?

If the costs associated with a temporary water dispersment project include: 1) planning and design; 2) construction of improvements; 3) the payment for services rendered in the reduction of nutrient loads; and 4) costs for de-constructing the improvements, how would this compare to purchasing the land outright? If the District purchased the land in fee simple, then the costs breakdown would be the following: 1) costs of purchasing the land; 2) planning and design; 3) costs of constructing the improvements; 4) costs of ongoing operation and maintenance.

In order for any project to be deemed a good value, there has to be a comparison to an alternative. The two above mentioned alternatives provide that comparison. Unfortunately, we were told no such comparisons were made to the dispersment projects. How can these projects be considered a good value, and thus a good investment of taxpayer dollars, if the District did not consider alternatives?

For example, in the past six (6) months, the Indian River County Board of County Commissioners have supported the purchase of two properties in the County. One property is already on the Florida Forever Indian River Lagoon Blueway project list and the other is being considered by the DEP's Acquisition and Restoration Council for inclusion into the Florida Forever Program. The first property, owned by Torwest Inc., borders the Indian River Lagoon and has various uplands and wetlands associated with it. The second property, Lewis Friend Farms, consists of over 1,000 acres that included uplands (762 acres) and wetlands (332 acres) that drain into the Blue Cypress Basin. That property could have been purchased outright for under \$5,300,000.00. Both properties could be purchased in fee simple for far less than what the District is spending on these ten-year dispersment projects.

Another example involves the Graves Brothers DWM area. In close proximity to the dispersment site is other land owned by the Graves Brothers that includes a slough to the Sebastian River. Purchasing the land in fee simple or obtaining a permanent conservation easement over the slough and surrounding area would provide immense, long term benefits to the Lagoon. When asked about the potential to protect this specific area, the District dismissed the opportunity.

One common response we heard from the District was that these landowners weren't interested in selling their property. But that was never considered an option by the District. Our Board recognizes the current Tallahassee aversion to land purchases and even perpetual easements. However, that does not mean Florida residents should accept temporary projects when permanent, higher value projects are available. Of course landowners aren't going to sell their land when they can lease their lands for significant value and then re-evaluate their land use options at a future date. The District is the entity coming to the table with significant taxpayer funding and therefore should set the parameters of the projects, not the other way around.

The January 12, 2016 agenda item for the two proposed DWM projects specifies the Florida Legislature's encouragement of using public-private partnerships to accomplish water storage and

quality improvements on *private agriculture lands*. The agenda item goes on to state that “citrus groves were targeted” due to challenges citrus farmers were facing due to citrus greening. The District did not start off with the position of finding the best location(s) for creating DWM sites, but rather, it limited its parameters to former citrus producing land. If the true goal of these public-private partnerships is to both support private agriculture lands while creating the benefits of water storage and nutrient reduction on those properties, then PIAS strongly advocates that the District first obtain an agriculture easement over the property ensuring that the property will remain in agriculture in perpetuity, and then enter into a secondary provision of ecosystem services (“PES”) contract for the providing of dispersed water management activities. That way, even if the DWM activities cease, the land will still remain in agriculture for the benefit of future generations.

The Pelican Island Audubon Society recognizes the invaluable contributions undertaken by the SJRWMD to protect the Indian River Lagoon and the St. Johns River. We need look no further than the Upper St. Johns Basin for evidence of this work. But PIAS believes that significant funding is being directed to projects with only short-term benefits when the potential for projects with higher value and perpetual benefits exists today.

We kindly request that the St. Johns River Water Management District Board reconsider moving forward with the dispersed water management projects as currently proposed and evaluate projects that provide permanent value.

Sincerely,



Richard H. Baker
President