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May 23rd, 2011

Tommy Strowd
Executive Director
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL
Via email: tstrowd@sfwmd.gov

Subject: Temporary Forward Pumps

Dear Executive Director Strowd:

Audubon strongly urges the South Florida Water Management District (District) not to install temporary forward pumps in the Lake Okeechobee Service Area. Installing and operating these pumps could eliminate the ability of the endangered Everglade Snail Kite to nest on Lake Okeechobee for several years. Conditions for the Everglade Snail Kite have degraded significantly since the United States Army Corps of Engineers (Corps) issued a temporary forward pumps permit in 2007. Installing these pumps also burdens on the District financially while delivering extremely limited benefits to the citizens within the District's sixteen county service area.

First, the installation of temporary forward pumps poses significant risk to the designated critical habitat and nesting success of the Everglade Snail Kite, a federally endangered species with only 700 individuals left in Florida. Every inch of water level depth on Lake Okeechobee dries approximately 3000 more acres of habitat (4.5 square miles). Kite population decreased almost 50% during the last two droughts, due in part to the use of forward pumps in 2007 that broke former low level records by about a foot. Apple snails are the Kite's only source of food, and these animals require standing water. When the marsh dries, the apple snail population drops dramatically, leading to multi-year harm for the Kite because it takes apple snails years to recover. The United States Fish and Wildlife Service (USFWS) estimated that water levels in the lake will need to stay above 10.0 ft to maintain sufficient inundated area to sustain a holdover population of snails in Lake Okeechobee. (USFWS, "Snail Kite Conditions and Drought Concerns," April 8, 2011). Additionally, Kite nesting success depends on adequate water levels. Seventeen Kite nests have failed already and some remaining nests are at perilously low depths. Installing the forward pumps could cause the remaining nests to fail.

Second, a cost benefit analysis shows that installing and operating forward pumps does not make financial sense. With unprecedented budget cuts looming, the investment of installing the fourteen temporary forward pumps is questionable. A full accounting of the costs associated with installation, operation (including current fuel prices), and removal has not been made available to the public.

In contrast, the benefits to south Floridians will be slight. The forward pumps will benefit growers in the Lake Okeechobee Service Area. However, leaving pumps in the structures as the lake rises would put the District in the position of pumping water downhill that otherwise would have flowed freely but for the obstruction of the pumps. Because the pumps have lower capacity than the structures they clog, southern areas such as the Everglades Protection Area could suffer delayed drought relief. In other words, not only will the pumps cause immediate harm to Lake Okeechobee, but they will also likely harm overly dry areas to the south by delaying water deliveries once the summer rains begin.

Third, conditions have changed significantly for the Snail Kite since the Corps issued its permit authorizing forward pumps in 2007. [See February 9, 2007 Corps Permit to the SFWMD, SAJ-2006-1969 (LP-TKW)]. It is true that the USFWS concluded that LORS 2008 was not likely to jeopardize the continued existence of the Everglade Snail Kite. However, since then a confluence of events over the past few years have lowered Lake Okeechobee's water levels and further aggravated Everglade Snail Kite populations. Recent weather patterns have created more frequent and severe droughts, such as in 2007 and 2008. The new water rationing plan (LOWSM) guarantees water supply deliveries no matter how low lake levels decline and the LORS schedule keeps lake levels lower on average. Thus, the 2007 permit relies on outdated information. It is the District's environmental stewardship duty to consider these changed circumstances in the decision-making process.

For these reasons, Audubon strongly urges your immediate attention to halt the installation of temporary forward pumps in the Lake Okeechobee Service Area.

Sincerely,



Eric Draper
Executive Director