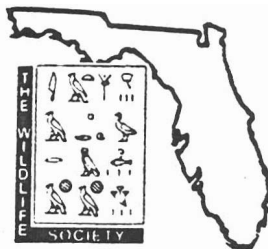


# FLORIDA CHAPTER THE WILDLIFE SOCIETY



1807 Northwest 39th Terrace  
Gainesville, FL 32605

January 20, 1986

Colonel John W. Devens  
Resident Member  
Board of Engineers for  
Rivers and Harbors  
Kingman Building  
Fort Belvoir, Virginia 22060-5576

Dear Colonel Devens:

The Florida Chapter of The Wildlife Society has reviewed the Final Feasibility Report and Environmental Impact Statement produced by the Corps of Engineers (COE) regarding potential modification and restoration of the Kissimmee River/C-38 Canal system. This report provides a substantial amount of valuable information covering the entire Kissimmee River Basin, however, there are some incorrect and misleading statements that tend to detract from the overall usefulness of this report. These statements primarily pertain to: (1) impacts on the resources of the Kissimmee River as a result of its channelization, (2) reference to past and present flow conditions, (3) existing fish habitat values, and (4) land use changes.

A particularly noteworthy error was made by the COE when they stated the wetlands of the Kissimmee River floodplain were declining prior to the channelization project. These alleged wetland declines were supposedly due to agricultural drainage systems within the floodplain and unspecified environmental changes. These statements are completely unfounded and appear to be an attempt to misrepresent the environmental impacts associated with channelization of this river. It is well documented that the channelization project drained a major portion of the river floodplain marshes and severely altered the remaining wetlands of this system. It also has been documented that the increased drainage provided by the channelization project made it possible for installation of secondary and tertiary agricultural drainage systems.

Another issue of concern is the "Principles and Guidelines" used by the COE for Federal water resource planning. With this procedure all restoration alternatives were compared with the No Action alternative, and unless they demonstrated an economic benefit, the COE could not justify its support for modifying the Kissimmee River/C-38 Canal system. In reviewing the COE's procedure, however, no costs were assigned to the No Action alternative (Table 16). This is a serious oversight since present operation and maintenance costs are over \$500,000 annually. In addition, the COE has predicted substantial future growth and development within the basin if protective land use measures are not incorporated. With such development water quality within the Kissimmee River, and ultimately Lake Okeechobee, would continue to deteriorate under the No Action alternative.

From a historical perspective, the reason for a review of the Kissimmee River/C-38 Canal system stemmed from concern over the health of Lake Okeechobee, particularly in regard to water quality. This is indeed a legitimate concern (particularly when considering the present condition of the lake), and further water quality degradation of either the Kissimmee River or Lake Okeechobee, must be considered as an economic cost. Conversely, the benefits of providing water quality improvements and the prevention or reduction of future non-compatible development within the Kissimmee River floodplain, must be considered as an economic gain for most of the proposed alternatives.

It may not be easy to place a dollar value on the cost of deteriorating water quality, but it is easy to understand the relationship of water quality problems to south Florida in terms of drinking water, fish and wildlife resources, recreation, and regional economy. Therefore, it is essential that the future situation of the No Action alternative be addressed. As such, the conclusion reached by the COE, "that there is no basis for Federal implementation of modifications" to the Kissimmee River/C-38 Canal system may be incorrect. It is possible that the future growth and resultant water quality degradation that would occur under the No Action alternative (predicted by the COE) may make this alternative the most costly proposal in the long run.

It was pleasing to see that the COE recognized that a combination of various restoration features and water management strategies could increase the restoration potential for the Kissimmee River. One item that should definitely receive further review is the possibility of diverting water from Lake Istokpoga

to the Kissimmee River as occurred under historical conditions. It was disheartening, however, to see the COE delete the Complete Backfilling alternative from assessment, stating it was dropped "because of the perceived negative impacts" associated with lost flood control capabilities and the costs of implementing this measure. The Florida Chapter of The Wildlife Society does not support the decision by the COE to omit this alternative. The Complete Backfilling option is at one end of the spectrum of proposed alternatives and represents the most comprehensive plan for restoration of a riverine system. It is essential that the entire range of proposals be maintained through the planning process to provide appropriate evaluation of the Kissimmee River restoration project. If the Complete Backfilling alternative is dropped then alternatives such as the No Action, Minimum Maintenance, and Enhance Existing System should be omitted as well.

Please contact me if you have any questions regarding these comments.

Best regards,

A handwritten signature in cursive script that reads "Wayne R. Marion". The signature is written in dark ink and is positioned below the typed name.

Wayne R. Marion  
President