



FLORIDA CHAPTER
OF
THE WILDLIFE SOCIETY

May 19, 1982

Water Resources Council
2120 L Street, N.W.
Washington, D.C. 20037

Dear Sir:

The Florida Chapter of The Wildlife Society strongly urges the U.S. Water Resources Council not to repeal the Principles, Standards and Procedures for Water and Related Land Resources Planning (PS & P). Repealing the PS & P rules, which established a standard framework for planning and evaluating alternative water resource plans, could have far-reaching impacts on environmental quality. Currently, the rules are enforced by law, and planners are required to comply with uniform procedures in developing, evaluating and presenting information to decision-makers. Re-structuring these requirements as non-binding guidelines would greatly diminish the ability of the public (including local and state governments) to intervene when ill-conceived or harmful projects are proposed.

It has been proposed that Environmental Quality be eliminated as a co-equal objective with National Economic Development in water resources planning. In essence this will favor selection of projects with the greatest net economic benefit, regardless of the potential changes to ecological, cultural and aesthetic values. Although many economically unsound projects may be stopped by this objective, it seems clear to us that the elimination of the environmental quality objective may have serious consequences.

Many of the water resource problems the state of Florida now faces are related to projects that were created without realizing long-term environmental and associated economic losses. The costly restorations of the Loxahatchee Slough, Kissimmee Valley and St. Johns River ecosystems would not have been necessary if the original projects had been properly evaluated and possible alternatives identified. Therefore we strongly urge you not to repeal the PS & P; we believe these rules are necessary in safeguarding the water resources and long-term economic well-being of the nation.

Sincerely,

Frank Montalbano, President
Florida Chapter
The Wildlife Society

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