



# United States Department of the Interior

## NATIONAL PARK SERVICE

Biscayne National Park  
9700 SW 328<sup>th</sup> Street  
Homestead, FL 33033  
305-230-1144

IN REPLY REFER TO

August 29, 2014

Mr. Blake Guillory  
Executive Director  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, FL 33406

Dear Mr. Guillory:

I am writing with regard to the request from Florida Power and Light (FPL) for a water withdrawal from the L-31E Canal. While Biscayne National Park (the Park) recognizes the need for a temporary emergency measure to relieve temperature conditions in the Turkey Point Power Plant Cooling Canal System (CCS), contingent upon conditions contained in the Emergency Final Order issued by the South Florida Water Management District (SFWMD) on August 28, 2014, we have serious concerns about the FPL request and the underlying problems that spurred this request.

The proposed quantity of freshwater to be withdrawn has been characterized as being above the amount reserved (i.e. "excess") for the Biscayne Bay Coastal Wetlands (BBCW) Comprehensive Everglades Restoration Plan Project (CERP). In addition, when the BBCW Water Reservation (Reservation) was codified, we were assured that water in the canals would not be available for withdrawal because there would be neither demand nor a means to withdraw significant quantities of water. The Park disagrees with the characterization of the amount of wet season water "above" the BBCW Reservation line as being "available" water. This disagreement is based on the use of a daily average reservation quantity without consideration of hydrologic seasonality and ecological water needs during the dry season. During the dry season, the amount of water needed for BBCW restoration and the Park far exceeds the available amount of inflowing freshwater. The amount of freshwater received in the wet season above the Reservation amount is necessary to maintain the correct salinity balance into the beginning of dry season within the Park and Biscayne Bay.

The Park is currently in negotiations with the U. S. Army Corps of Engineers (USACOE), Miami-Dade County (MDC), and the SFWMD over the Phase 2 continuation of the BBCW Project. Phase 2 of this project envisions, among other actions, being able to

redistribute and carry over freshwater from the wet season to moderate the extensive deficits of the dry season needs for the Park and Biscayne Bay.

It was the understanding of the Park that no water from the Regional System would be necessary for the operation of Turkey Point Power Plant Units 3 and 4. The proposed withdrawals from the L-31E Canal for the CCS for Turkey Point units 3 and 4 are withdrawals of water from the Regional System. The Park is concerned that the use of this water will negatively affect the Park in the short term, and set a precedent for future freshwater requests, using this limited withdrawal as an example of the "availability" of freshwater from the coastal canal system.

The Park is especially concerned that the cooling canal system continues to be in crisis while the causes remain unidentified. An extreme rainfall deficit over the cooling canals has been cited by FPL as a cause of a 30 ppt salinity increase, but given much higher rainfall measurements at all other local stations, this explanation seems implausible. Rather, we are concerned that increased temperature and salinity, with the occurrence of dense algal blooms, may be a consequence of altered FPL operations and that these problems have not been clearly identified, may be related to the Units 3 and 4 uprate, and could become a persistent problem. The cause of these extensive changes must be identified and corrected without future reliance on water from the Regional System which is needed for the Park and Biscayne Bay.

Despite these serious concerns, we appreciate the importance of addressing an emergency situation and will not oppose the SFWMD Emergency Order Conditions for approval of L-31E water withdrawals. In particular, our support hinges on two major parts of these Conditions:

1. The authorized quantity of withdrawals are defined daily by SFWMD and monitored and reported daily by FPL.
2. These withdrawals are a temporary and singular action that will end no later than October 15, 2014, with the prompt removal of all withdrawal facilities, infrastructure, and equipment associated with regional system water withdrawals.

Additionally, Governing Board concurrence in this emergency action should be contingent upon other actions to mitigate the harm caused to adjacent wetlands, the Park, and Biscayne Bay by this action. This mitigation should include:

- Water delivery to the wetlands and coast of southern Biscayne Bay and the Park of an equivalent amount of water withdrawn by FPL to minimize 2014-2015 dry season impacts of the withdrawal. This delivery ideally would occur after October 15, 2014 and must conform to legal requirements of waters for Everglades National Park and any other existing legal water users.

- Mitigation for this one time action that expedites and promotes the long-term success of the BBCW project. Such an action could be defined via a collaborative discussion among the Park, SFWMD, Miami-Dade County, FPL, and other interested parties.

We encourage the initiation of a project to put in place and receive permitting to remove water from the Floridan Aquifer as a substitute water source as a means to both decrease water temperatures and lower salinity of the cooling canals.

Thank you for your consideration and we appreciate the opportunity to continue our cooperative efforts preserving Biscayne National Park and Biscayne Bay.

Respectfully,



Brian Carlstrom  
Superintendent

cc: South Florida Water Management District Governing Board

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