



April 9, 2018

Esteban L. Bovo, Jr.
Chairman, Miami-Dade County Board of County Commissioners
Stephen P. Clark Center
111 NW 1st St., Ste. 320
Miami, FL 33128

Dear Chairman Bovo,

On behalf of the National Parks Conservation Association, America's leading voice in support of our national parks, I would like to offer comments on the draft Joint Participation Agreement between Miami-Dade County and Florida Power & Light (FPL) regarding the treatment and reuse of County wastewater. We believe that, provided wastewater is treated to high enough standards that protect surrounding ecosystems, this partnership has the potential to address environmental challenges facing the County and FPL, while also supplying additional freshwater needed for ecosystem restoration.

Biscayne Bay and Biscayne National Park have long been starved for freshwater. The Biscayne Bay Coastal Wetlands project, part of the Comprehensive Everglades Restoration Plan, was designed to improve freshwater deliveries to Biscayne Bay and Biscayne National Park, restoring coastal wetlands and tributaries. However, progress on the project, including advancing planning efforts for Phase II, have been delayed by an apparent absence of freshwater needed for restoration. The use of highly treated wastewater was long considered an option for restoration but has been shelved due to high costs. A public-private partnership between Miami-Dade County and FPL has the potential to provide substantial ecological benefits for Biscayne National Park.

In addition to restoration, the partnership could also benefit the local ecosystem by reducing FPL's reliance on freshwater from the natural system, which is needed instead for restoration and the region's continued growth. Furthermore, transitioning away from the use of ocean outfalls that discharge sewage directly into the ocean and moving towards the sustainable treatment and reuse of wastewater would have benefits for decades to come. Finally, improving the health of coastal wetlands through restoration would improve the County's resilience to extreme weather events and rising seas, at the same time pushing back against saltwater intrusion.

We recognize that there is a direct hydrological connection between the cooling canal system at Turkey Point, the Biscayne Aquifer, and surrounding surface waters, including those of Biscayne Bay. Therefore, any water that is added to the cooling canals must be treated to standards appropriate for the release of water into Biscayne Bay and Biscayne National Park, specifically in terms of nutrient standards. It is in the best interest of Miami-Dade County and FPL, as well as the public, not to introduce any additional pollutants into the system.

We request that, if negotiations on a potential partnership between the County and FPL on reuse continue, the public remains engaged and informed on the issue. Provided that strict water quality standards appropriate to the specific use of treated wastewater are met, this partnership has strong potential to address a number of ecological challenges. We look forward to future collaboration, dialogue, and engagement on this issue.

Sincerely,



Caroline McLaughlin
Biscayne Program Manager
National Parks Conservation Association

cc: Miami-Dade County Board of County Commissioners
Carlos Gimenez, Mayor, Miami-Dade County
Jack Osterholt, Deputy Mayor, Miami-Dade County
Lee Hefty, Director, Miami-Dade County Division of Environmental Resources Management
Kevin Lynskey, Director, Miami-Dade County Water and Sewer Department
Margaret Goodro, Superintendent, Biscayne National Park