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Mike Albert, Project Manager
South Florida Water Management District
3301 Gun Club Road, MSC 8312
West Palm Beach, FL 33406

Dear Mr. Albert:

South Florida Wildlands appreciates the opportunity to submit these comments regarding the “Everglades Agricultural Area Storage Reservoir Project.”

South Florida Wildlands was founded in March of 2010 to protect wildlife and wildlife habitat in the Greater Everglades. We have weighed in on numerous aspects of Everglades restoration over the years and were able to attend two of the planning meetings on the reservoir project.

As we have expressed in various communications to the public and with your agency, South Florida Wildlands strongly favors natural restoration of the Everglades which maximizes the return of wetlands to the original floodplain of the Kissimmee-Everglades-Okeechobee ecosystem. That applies not only to the area south of Lake Okeechobee where the EAA reservoir is to be built, but also to the various basins north, south, east and west of the lake. When government entities and environmental groups discuss the need to “store, treat, and convey water” we firmly believe that “nature knows best.” Every acre of wetlands restored in the lands surrounding Lake Okeechobee improves both the water coming into the lake – as well as the quality of the water leaving it. Plan 6 (see summary here: <https://goo.gl/Uj1ro4>) would be our environmentally preferred solution for the portion of the system immediately south of the lake.

South Florida Wildland also supports all efforts to expedite “Mod Waters” and move water through the current impediments that exist in the levees and Tamiami Trail at the southern end of the man-made system. It is clear to us from our own fieldwork in Water Conservation Areas 3A and 3B, that a woefully insufficient amount of water is able to pass through the southern levee, the Tamiami Canal, and Tamiami Trail en route to the Shark River Slough, Taylor Slough, Florida Bay, and the Gulf Coast of Everglades National Park to allow that magnificent ecosystem to function as it once did. Both the park and the estuaries are simply dying as a result of a lack of fresh water.

However, as Matt Morrison from your agency has explained at the meetings, neither Plan 6 nor any other alternative that doesn’t include some combination of reservoir and STA is open for discussion at this time. The Florida legislature has passed SB 10 and your agency is now looking for comments on how land available to that project should be utilized. With that in mind, we make the following points:

1. The SB 10 reservoir was sold and passed as a solution to the damaging discharges that exit Lake Okeechobee through the St. Lucie and Caloosahatchee River/Canals and which plague the system with algae-producing nutrient-laden water during periods of heavy rainfall. Not only is the volume of water enormous during those events – but the quality of water is also terrible. The water pours into Lake Okeechobee after passing through literally millions of acres of dense cattle and agricultural lands in the Kissimmee River floodplain as well as places like Indian Prairie, Nubbins and Taylor Sloughs. Those locations are also some of the highest in phosphorous in the entire system. And storms churn up the lake and lake bottom itself – and its enormous stored volumes of stored agricultural waste in the water column and bottom substrate – feeding algae blooms and bringing more nutrients to the St. Lucie and Caloosahatchee estuaries.

In the last public meeting on this topic, we cited 24,000 cfs as the flow of water into Lake Okeechobee after Hurricane Irma passed through our region. That was agreed to be accurate by staff present. That works out to something in the order of 50,000 acre-feet of water per day. According to the SFWMD, the entire “rebuilt” system is going to be designed to treat and convey south some 300,000 acre-feet of water annually – or approximately six days of water at that rate of flow coming into the lake during the post-Irma rain event. Granted that is not a usual flow of

water, but even compared to the normal annual flows of water which currently pass through the lake and out to the estuaries (and heavy rain events are predicted to become more and more the norm as climate change sets in and our atmosphere warms and holds increasing quantities of water vapor as a result), the SB 10 project is literally going to be a drop in the bucket. Even if the reservoirs, STAs, Everglades Agricultural Area, and Water Conservation Areas were near bone dry at the onset of a period of heavy rain – an impossibility – the system (with or without SB 10) would likely be unable to store and treat the flows of water which enter the system (and which currently are mainly discharged through the canals to the estuaries) from a significant portion of the Florida peninsula during even a typical year – let alone one with heavy rainfall. Only a flowway which mimics the unlimited capacity of the historic Everglades to transport water from the center of the state to places like Florida Bay, Biscayne Bay, and the Ten Thousand Islands would be capable of accomplishing that.

2. During the discussions at the meetings, it became increasing clear that the limiting factor in moving water through the system was the throughput capacity of the STAs. Without that function, a reservoir is just a “mini-me” of Lake Okeechobee with all of the same problems – or worse due to size and stagnation – in terms of water quality. So even if one were to disagree with our first point above by stating that the reservoirs are meant to work as “dynamic storage” and not static – meaning water moves from the reservoir or reservoirs into STAs before moving south – the capacity of current and future STAs to “move water south” (given the footprint available to build them) is woefully insufficient to move and treat anywhere near the volume of the water currently passing through the St. Lucie and Caloosahatchee on an annual basis into the estuaries.

3. As stated above, our first choice by far for Everglades restoration is the flowway and a return to natural wetlands throughout the system. In addition to correcting water woes – it actually creates wetlands wildlife habitat along the way. We also regret that the likely location for the SB 10 reservoir is exactly in the middle of the floodplain once (theoretically) earmarked for the Plan 6 flowway. However, as these are scoping comments for the project that the legislature and the SFWMD has placed on the menu (and there currently is no other restaurant in town – not due to what is possible but to what politicians - not scientists - have decided) South Florida Wildlands recommends maximum STA and minimum reservoir with whatever final land parcel is available for the project. In other words – in the

balance between STA and reservoir which has been the subject of the recent meetings - we would favor the minimum-sized reservoir necessary for feeding water into the maximum sized STA or STAs. That configuration would favor the largest flow of clean fresh water possible into the Everglades and estuaries south of the project area.

However – it is important and essential to point out again that the Everglades south of the project area is not hurting for lack of water during and after heavy rain events. South basin rainfall and discharges from the EAA is usually more than enough to bring the current system south of the lake to absolute capacity. Water cannot be released because of the need to keep the urban area dry enough to discharge water from seasonal rain events. Likewise, the Miami, New River and other canals which drain the urban area cannot be used for the same reason – they are essential to keeping an urban area dry for the more than 6 million residents – and many tourists and visitors – who reside in the area. If the canals are filled with discharged water, they have no available capacity to drain the Lower East Coast Metropolitan Area. Therefore, we again stress the absolute need to move as quickly as possible to get water moving from WCAs 3A and 3B into the Shark River Slough and Everglades National Park. There is no point in this entire SB 10 project if water cannot be successfully moved in that direction.

4. During the last meeting and in personal communications with SFWMD staff, South Florida Wildlands stressed the need for the agency to provide a layperson-friendly data page on water moving through the entire system. Interested visitors to your extensive site should be able to see at a glance how much water is moving into Lake Okeechobee, how much water is moving out through the canals to the estuaries, how much water is entering the EAA, STAs, the Miami River, New River, and other canals, etc. And without having to go to multiple pages and data sets. The whole ball of wax summarized in a couple of easy-to-read pages. It's not rocket science and it shouldn't look that way to a public anxious for information on that important topic.

South Florida Wildlands should also not be in a position of having to explain to the public that SB 10 is no more than a very partial solution to the discharges plaguing the communities at the receiving end of waters coming from the lake through the St. Lucie and Caloosahatchee canals. Your agency is well-aware of that unfortunate fact. Simply put, the data that your office has from its many

monitoring stations should provide a concise summary of inflows and outflows throughout the entire system. With that understanding from the public, you will also likely receive better suggestions on how to correct the problems which plague the system. And receive much more buy-in from the changes that you do adopt.

Thank you for your consideration of these comments – submitted quickly just before Thanksgiving. Best wishes to you and your family for the holiday.

Best regards,

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