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Greetings:

South Florida Wildlands Association (SFWA) appreciates the opportunity to submit some brief written comments on the EAA Reservoir. We were able to provide oral comments at the June 28th public meeting in Stuart, Florida. Given the short amount of time and the very large number of issues before our organization, these comments will simply be a summary of the comments we provided at that meeting.

According to the Draft EIS, the purpose of the reservoir and allied projects is “to improve the quantity, quality, timing and distribution of water flows to the Northern Estuaries, Water Conservation Area 3, Everglades National Park, and Florida Bay while increasing water supply for municipal, industrial and agricultural users to a greater extent than would be accomplished in the authorized Central Everglades Planning Project.” We believe that the reservoir will succeed in providing a backup water supply for agricultural and municipal users. However, the vast amounts of water that are currently discharged to the estuaries will be little changed by the reservoir and its associated Stormwater Treatment Area (STA).

As we said at the meeting and as we expressed several times to the SFWMD during a series of meetings that agency held on this project, the EAA already contains 52,000 acres of STA. They are capable of cleaning and conveying additional water to the various components of the Everglades during the dry season. However, during the wet season, nearly all the water going into them is simply EAA basin runoff. Little to no water from Lake Okeechobee is cleaned and sent south by existing STA's. The STA associated with the new EAA reservoir is only going to increase the STA capacity to clean and send water south by 12.5 percent during the DRY season. During wet years, the vast volumes of water sent south into the St. Lucie and Caloosahatchie estuaries will continue.

We believe the Corps must do a much better job of conveying to the public the precise ways in which the Central and Southern Florida Flood Control Project entirely transformed the Everglades and created the EAA, the Water Conservation Areas, the expanded Herbert Hoover Dike. It also needs to be made clear the function of the canals leading to the estuaries in this completely transformed Everglades. The vast majority of the nutrient laden water going into Lake Okeechobee comes from north of the Lake and – given both the fragility of the dike and agricultural and residential development that has gone in south of the lake – excess water must currently be discharged to the east and west.

We believe that the planned reservoir will rapidly fill with EAA basin runoff during the wet season or, during the dry season, with water from Lake Okeechobee. In either event, it will simply function as a mini-Lake Okeechobee in terms of nutrients and water quality. It will also likely develop the same algae problems we see in Lake Okeechobee during the warm summer months. The STA associated with the reservoir will not have anywhere near the capacity to clean and convey sufficient water (going from the lake to the reservoir to the STA to the Everglades) during periods of heavy discharges. Water must remain in an STA to be cleaned – and that does not allow diversion of any significant amount of water from the lake.

On the other hand – water from the reservoir sent by canal to portions of the EAA during periods of low rainfall, or to the municipal wellfields via canal – will provide a significant boost during dry periods. That should also be made clear to the public – the three-part motives of this project – so this project is not seen as solely “Everglades Restoration” and a solution to the discharges.

As mentioned in the meeting, we also take issue with the idea that during periods of heavy rainfall, water will be able to be moved from the reservoir to the Miami and North New River Canals to create room and additional capacity in the reservoir. Those canals currently function as the backbone of the drainage system that allows millions of residents to live in Broward and Miami-Dade Counties. One of the main reasons those canals are not utilized currently to remove water from Lake Okeechobee during periods of heavy rain – and thereby “move the water south” - is to allow those canals the capacity to drain those urban counties – the two largest counties in Florida in terms of population. And moving water south directly from the reservoir into portions of the Everglades without the lowered nutrient levels which are provided by the STAs would also damage the natural areas as well as estuaries such as Florida Bay. Those ecosystems are dependent on large volumes of nutrient poor waters and will cease to function if inundated with the nutrient-laden water expected in the reservoir.

Several years ago, the U.S. Sugar deal was negotiated by Governor Charlie Crist which would have allowed 180,000 acres of sugar lands to be purchased at a price of approximately 7 to 8,000 dollars per acre. I believe the final price after the U.S. Sugar mills were eliminated was 1.4 billion dollars. At the time, neither the Corps nor the SFWMD expressed any interest in the deal. At a meeting in Stuart during the height of the discharges of 2013, it was even expressed that buying sugar lands and returning it to wetlands was contrary to the purposes of the “Central and Southern Florida Project for Flood Control and Other Purposes.” And yet buying out those sugar lands and allowing them to return to wetland is exactly the kind of project that would make a true difference in the system. It is ironic that the estimated cost of the EAA reservoir is almost exactly the price of the U.S. Sugar land buyout.

But quite simply, that is the problem with this reservoir/STA project and nearly every other project introduced to “fix the Everglades.” The C&SF tamed the Everglades for

the purpose of making it “productive.” It succeeded wildly both in terms of agriculture and residential growth. The discharges to the estuaries, the loss of tree islands throughout the system, the oxidation and loss of Everglades wetland soils, the hyper-salinity of the estuaries, and virtually all the problems of the current Everglades can be traced back to the C&SF.

Time has run short, and these comments were begun too late. However, we believe this project represents an enormous expense to the taxpayers and will not achieve the goal they expect – a restored Everglades. We believe this same money should be spent on acquisition of agricultural land south and north of the lake – and in transitioning those lands back to the wetlands which were the real experts in “holding, cleaning, and conveying” water. I recently visited the east side of the Southern Gardens citrus orchards – the part of the U.S. Sugar deal that did go through. Orange groves have been reconverted to wetlands. That is the model which will work, and which should go forward here in lieu of the EAA Reservoir. The “Plan 6” project and “flowway” would accomplish that far better than the preferred alternative – and should have been considered here among the range of alternatives up for analysis.

Best regards,

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