Appendix C

Pertinent Correspondence

CEPP New Water Modification Final EIS

Previously Titled: SFWMD Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area, May 2018

Appendix C

Pertinent Correspondence

SFWMD Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area

How to comment

- Email Stacie.J.Auvenshine@usace.army.mil
- Mail Stacie Auvenshine, U.S. Army Corps of Engineers Jacksonville District, P.O. Box 4970 Jacksonville, FL 32232-0019

INDIAN RIVER LAGOON

Now's the time to comment on Lake O reservoir plan

Tyler Treadway
Treasure Coast Newspapers
USA TODAY NETWORK - FLORIDA

The Army Corps of Engineers wants to know what you think about the plans for the reservoir being designed to help cut Lake Okeechobee discharges.

The Corps is preparing an environmental impact statement to evaluate and document possible effects of the reservoir design developed by the South Florida Water Management District and will accept comments on the plan through April 30.

All the comments will be included in both the draft and final environmental impact statements, said Jenn Miller, a Corps spokeswoman.

The district submitted its design for the reservoir to the Corps on March 30.

19 April 2018

Dear Stacie J. Auvenshine

My comment on Lake Okeechobee Reservoir plan. I have always been for the Reservoir plan from day one. It is what we have needed to stop, the lake discharges and send water south to the Everglades

We also need to enforce action to clean up all run-off water from north of Lake Okeechobee. With the 36 foot elevation drop to Lake Okeechobee, all run-off water from north of lake goes to Lake Okeechobee. By enforcement of BMPs and the 40E-61 we can clean-up run-off waters.

Robert M Norton
Ecosystem Watch
Lake Okeechobee

From: Abe Levy
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc: "Rae Ann Wessel"; "Mitsch, William"; "Jennifer Rubiello"; "Pat Levy"
Subject: [Non-DoD Source] EAA Reservoir
Date: Tuesday, April 24, 2018 10:24:28 AM

I am writing to support strongly the construction of the EAA reservoir.

While I would prefer a much larger and shallower wetland, rather than an over 20-feet deep reservoir, I am grateful for this very modest step in the right direction of moving water southward from Lake Okeechobee into an EAA and from there southward into the Everglades.

Thank you for anything you can do to expedite the construction of this reservoir.

Abe Levy

4875 Pelican Colony Blvd Apt 301

Bonita Springs FL 34134-6916

abe@slought.org <mailto:abe@slought.org>

914-924-1260

From: Mitsch, William
To: abe@slought.org
Cc: Auvenshine, Stacie J CIV USARMY CESAJ (US); Rae Ann Wessel; Jennifer Rubiello; pat@slought.org
Subject: [Non-DoD Source] Re: EAA Reservoir
Date: Tuesday, April 24, 2018 10:31:16 AM

Abe and Pat,
I am less enthusiastic because water quality plan is inadequate and swept under rug just to encumber $2 billion. I am writing piece now for ACOE request on behalf of Friends of Everglades. Might be able to show you draft by Friday. When do you comment? Can u wait till then?
Bill

Sent from my iPhone

On Apr 24, 2018, at 10:24 AM, Abe Levy <abe@slought.org <mailto:abe@slought.org> > wrote:

I am writing to support strongly the construction of the EAA reservoir.

While I would prefer a much larger and shallower wetland, rather than an over 20-feet deep reservoir, I am grateful for this very modest step in the right direction of moving water southward from Lake Okeechobee into an EAA and from there southward into the Everglades.

Thank you for anything you can do to expedite the construction of this reservoir.

Abe Levy

4875 Pelican Colony Blvd Apt 301

Bonita Springs FL 34134-6916

abe@slought.org <mailto:abe@slought.org>

914-924-1260

From: Alan Farago
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc: Bill Mitsch
Subject: [Non-DoD Source] Friends of the Everglades: Comments on EIS/ EAA Reservoir scoping
Date: Monday, April 30, 2018 1:31:11 PM
Attachments: 43018FOE re EAA reservoir.pdf
EAA reservoir report for ACOE v3.pdf

Friends of the Everglades
Founded in 1969 by Marjory Stoneman Douglas
11767 South Dixie Highway #232
Miami, Florida 33156
305.669.0858

April 30, 2018
By Email and Regular Mail

Stacie Auvenshine
U.S. Army Corps of Engineers
Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019
Stacie.J.Auvenshine@usace.army.mil

RE: Everglades Agricultural Area Reservoir

Friends of the Everglades offers comments by our consultant, Dr. William J. Mitsch. Friends of the Everglades was founded by Marjory Stoneman Douglas in 1969. Our organization is engaged in legal matters involving Everglades restoration (Miccosukee Tribe of Indians of Florida, Friends of the Everglades, plaintiff, v. United States of America, et al. No. 04-21448-CIV, U.S. District Court South Florida).

We appreciate the opportunity to comment on scoping for the EIS and look forward to providing input during the federal review process.

Sincerely,

Alan Farago, VP Conservation

Cc: William J. Mitsch, Ph.D.

Encl. *Comments on the EAA Reservoir Plan*

Restoring the Florida Everglades: Comments on the EAA Reservoir Plan

by

William J. Mitsch, Ph.D.
Consultant, Friends of the Everglades
Director--Everglades Wetland Research Park,
Eminent Scholar--College of Art & Sciences, and
Juliet C Sproul Chair for Southwest Florida Habitat Restoration,
Florida Gulf Coast University
Chair, U.S. National Ramsar Committee
Founder and Editor-in-Chief, Ecological Engineering 1992-2017
Professor Emeritus of Environmental Science, The Ohio State University
Courtesy Professor of Soil and Water Science, University of Florida
Courtesy Professor, School of Geosciences, University of South Florida

Pertinent Bio

My lab at FGCU, referred to as the "Everglades Wetland Research Park" has published recently and frequently about modeling, monitoring, and experimenting with water quality improvement in the sawgrass "river of grass" eastern half of the Greater Florida Everglades (Mitsch, 2016; Mitsch et al., 2015, 2018; Marios et al., 2015a,b; Yeoman et al., 2017). In addition, over the past 25 years I presented wetland modeling short courses at SFWMD and served on several SFWMD review committees, including serving as chair of a panel reviewing the Everglades Land Model (ELM) in 2006. Over the past 30 years, my lab has published many versions of models specific to wetlands and nutrient retention, particularly related to phosphorus (Mitsch et al., 1982, 1988; Mitsch and Fennessy,1991; Mitsch and Reeder, 1991; Christensen et al., 1994; Wang and Mitsch, 2000; Jørgensen et al., 2005; Zhang and Mitsch, 2005; Marois and Mitsch, 2015a).

Introduction

I believe that the Florida Everglades restoration is now at a crucial crossroad that will determine its long-term success or failure so I consider it prudent to make some comments on the EAA Reservoir Plan as it is currently described. We were unable to delve into the details of hydrologic modeling performed by the SFWMD related to this project given the short time allowed for comments and lack of support for a rigorous modeling effort, but I am providing this hopefully constructive critique so that the U.S. Army Corps of Engineers and the South Florida Water Management District can fine-tune the "EAA Reservoir" plan so that it becomes a significant step forward toward completion of a sustainable Florida Everglades restoration.

I first express my support for seeing an ambitious effort for eliminating decades of stalling with a serious “sending the water south” strategy, the mantra for a generation of those who understand the big picture of what the Florida Everglades restoration is all about. The South Florida Water Management District claims the EAA Reservoir project will — when used in conjunction with other existing and planned projects — reduce the number of damaging discharge events from Lake Okeechobee to the St. Lucie and Caloosahatchee rivers by 63 percent and increase the flow going south by 76% by 160,000 acre-ft/year to 370,000 acre-ft/year (121 billion gallons per year) of water south to the Everglades and Florida Bay from Lake Okeechobee.

But if this plan results in pollutants, particularly phosphorus and nitrogen, getting into greater Everglades (WCAs and south) or develops an unsustainable, un-ecological and/or simply polluted reservoir to manage in perpetuity, we will regret the day we said OK “just to spend the money.” I am not assured from what I see written so far from SFWMD that this project is properly focused on what is important—sending clean water to the greater Florida Everglades. If ever there was a need for an ecological engineering and not just civil engineering approaches to lead the Everglades restoration, this is it.

The Plan

A current plan, referred to as C240A (Smith, 2018), calls for sending Lake Okeechobee water to a “EAA Reservoir” to be constructed 30 or so miles south of Lake Okeechobee with the following design: 23-foot-deep, 10,100-acres, with the ability to store up to 240,000 acre-ft (78.2 billion gallons) of excess Lake Okeechobee water. The plan also involves completion of a previously approved 15,000–acre A-1 Flow Equalization Basin with a maximum water storage 60,000 acre-feet (20 billion gallons). The plan also includes the design and operation of 6,500 acres of shallow treatment wetlands (sometimes referred to by the SFWMD as Stormwater Treatment Areas (STAs), similar to the 57,045 acres (23,085 ha) of STAs already constructed to clean the water prior to its discharge to the Everglades to the south.

Concerns

1. My first comment concerns the false expectations by the public so that they approve expenditures of up to $2 billion. I have frequently heard “well the project is not perfect, but let’s do it while the money is there.” The volume of water being discharged south needs to be put in perspective; the 121 billion gallons/year of water eventually being sent south to the Everglades and Florida Bay in the EAA reservoir plan will not solve the estuarine pollution of the Gulf of Mexico and Atlantic Ocean coastlines. Figure 1 illustrates the Everglades Restoration plan that I have had in my textbooks since we published it in the Mitsch and Jørgensen (2004) ecological engineering book 14 years ago and continued to be published in the 4th and 5th editions of “Wetlands” (Mitsch and Gosselink, 2007, 2015). I am aware that the restoration plan shown in the 3rd panel has been

changed in several more recent publications and in prominent locations including the well-known wall maps at Corkscrew Swamp Sanctuary lobby that now show significant water flowing east and west flow to the coastal estuaries, even when the restoration is complete. It is not clear that the public is aware that this subtle change in graphics represents a major change in the overall restoration goals in the past decade.

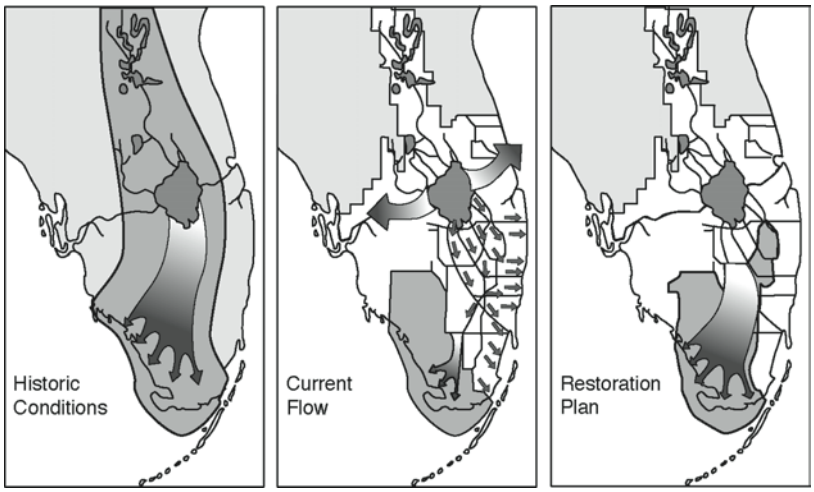

Figure 1. Three-picture summary of historic, current, and restoration water flow in the Florida Everglades as provided by the U.S. Army Corps of Engineers in the early 2000s. (from Mitsch and Jørgensen, 2004)

To put 121 billion gallons of water per year in perspective, 3.1 billion cubic meters or 819 billion gallons) were discharged to the St. Lucie and Caloosahatchee rivers in the El Nino flooding year of 2016 (Table 1), 6.7 times the flow expected to go south with the EAA Reservoir plan. Even in the last 10 years (2008-2017) an average of 1.5 billion cubic meters per year or 396 billion gallons (Table 1) is 3.3 times 121 billion gallons per year of water that will be sent south according to the plan.

Table 1. Freshwater discharges from Lake Okeechobee to the sea over the period 2008-2017, and annually in 2013, 2016, and 2017.

Discharge from Lake Okeechobee	2008-2017	2013	2016	2017
Discharge to Caloosahatachee and Gulf of Mexico ($x10^9$ m^3)	1.3	1.6	2.2	1.7
Discharge to St. Lucie and Atlantic Ocean ($x10^9$ m^3)	0.2	0.6	0.9	0.6
TOTAL Discharge to the sea ($x10^9$ m^3)	1.5	2.2	3.1	2.3
Equivalent depth of Lake O discharged to sea (m)	0.8	1.1	1.6	1.2

Discharge data from:
USGS 02292010 CALOOSAHATCHEE CANAL DWS OF S-77 AT MOORE HAVEN FL
USGS 02276877 ST. LUCIE CANAL BLW S-308

2. There is insufficient detail on water quality in the plan relative to water volume and flow. The flow south to the Everglades will increase by 76% from 210,000 acre-ft/yr (68 billion gallon/yr) to 370,000 acre-ft/yr (121 gallon/yr) according to the most recent approved version of the EAA Reservoir plan (Smith, 2018). Despite the 76% increase in flow, the project shows an increase in treatment wetlands of only 11% (6,500 acres) to designed to improve water quality directly. I estimate a minimum of at least 43,000 additional acres of treatment wetlands (STAs or passive wetlands) will be needed to treat the water flowing south. Further, we note that the estimated average concentration of phosphorus flowing out of Lake Okeechobee is 147 ppb (Goforth, 2010) while the average inflow to the current STAs in about 100 ppb (SFWMD, 2016). Due to the higher flow, it is common sense that the phosphorus concentrations reaching current and future STAs will be higher than the concentrations reaching them now and, in that case, threaten existing state and federal standards on Everglades water quality.

3. The new EAA reservoir will not resemble any natural feature of aquatic ecosystems in the greater Florida Everglades in ecology, morphology or hydroperiod. The hydroperiods will be wrong and exaggerated for south Florida ecology (similar to the way wetland hydroperiods were shifted in the Great Lakes with diked marsh hunt clubs and conservation areas, Mitsch et al., 2001; Mitsch and Gosselink 2015). The potential amplitude of the annual hydroperiods of up to 23 feet in the EAA reservoir is exceeded only rarely in natural or human-created ecosystems, e.g. the Amazon River (Junk et al., 1992) or Three Gorges Dam reservoir (Mitsch et al., 2008). The reservoir may become a “freak ecosystem” over time, i.e., an aquatic ecosystem dissimilar in hydrology and probably ecology to any other aquatic ecosystem in Florida.

4. Most eutrophic lakes in our experience become occasional or even permanent sources rather than sinks of nutrients—Buckeye Lake, Ohio (W.J. Mitsch, personal experience), Taihiu Lake in China (Kelderman et al., 2005), and even Lake Okeechobee (Havens and James, 2005). It is highly probable that the EAA reservoir will not be a nutrient sink in most years, an assumption that is included in this plan. Using a Vollenweider-type model (Hejzlar et al., 2006) in SFWMD’s DMSTA model as proof that the EAA reservoir will always be a nutrient sink is ecologically and hydrologically inaccurate and misleading. The DMSTA model was developed to evaluate multiple STA design alternatives. Model simplicity resulted from aggregation of key variables and processes controlling phosphorus storage and cycling (Walker and Kadlec, 2011). But the DMSTA has not been calibrated for reservoirs. Also, the model can be used on a daily inflow step and the empirically derived coefficients are based on long-term annual average values.

Conclusions

- The EAA Reservoir is considered the heart of this recent attempt to send water south in the Florida Everglades and is a good start of the discussion of solving water excess and scarcity problems. The Florida State Legislature and the South Florida Water Management District plan to increase the southerly flow by 63 percent and send an average of 121 billion gallons of water south to the Everglades and Florida Bay is noteworthy.

- Nevertheless, there is considerable ambiguity in the plan and its model predictions about the quality of the water as it enters the greater Everglades south of the EAA Reservoir and through Miccosukee Tribal lands on its way to the Everglades National Park and Florida Bay. At a minimum, ~50,000 acres of treatment wetlands (STAs) need to be created or restored in proximity to the EAA Reservoir; 6,500 acres of shallow treatment wetlands will be insufficient to protect the Everglades.

- The plan for an EAA reservoir immediately south of Lake Okeechobee needs to be re-examined. For example, purchase of farmland at a fair price coupled with conversion of that land to treatment wetlands (perhaps as many as 150,000 acres from the 700,000 acre EAA) in lieu of construction of a ~$2-billion EAA reservoir is a reasonable alternative to the reservoir for water storage and water quality and should be examined. Additionally, state-owned lands currently leased to agricultural tenants could be incorporated in any comprehensive review of alternatives. Adequate wetland creation to achieve water quality in the Florida Everglades is true “restoration”; creation of large difficult to manage deep reservoirs is not. If a deep reservoir in Florida’s subtropical climate compounds costs and problems for existing Everglades restoration plans, Corps acceptance of this plan should be conditioned by adequate stormwater treatment areas, i.e., treatment wetlands (STA’s) and flow equalization basins (FEB’s) to mitigate the chances of falling short.

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From: Alex Gillen
To: Miller, Jennifer S CIV USARMY CESAJ (US); Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] *** Corps accepting comments on environmental review of State's EAA reservoir study ***
Date: Monday, April 16, 2018 12:12:47 PM

Hi,

I am writing to inquire as to how I get on the email list for the EAA reservoir project evaluation updates?

For email updates, can you please add the following email addresses to your distribution list:

apreston@bullsugar.org <mailto:apreston@bullsugar.org>
alanfarago@me.com <Blockedhttp://me.com>

cmaroney@bullsugar.org <mailto:cmaroney@bullsugar.org>

pgirard@bullsugar.org <mailto:pgirard@bullsugar.org>

agillen@bullsugar.org <mailto:agillen@bullsugar.org>

For hard copy information, can updates be sent here:
2336 SE OCEAN BLVD
STE 172
STUART, FL 34996

If there is a greater Everglades Restoration distribution list, we would also like to be included there if possible.

Thanks so much and please let me know if you have any questions or if I should direct this email to anyone else.

Best,

Alex

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This electronic transmission contains information which is confidential and/or privileged. The information is intended for use only by the individual, group, or entity named above. If you are not the intended recipient (or the employee or agent responsible for delivering this information to the intended recipient), you are hereby notified that any use, dissemination, distribution, or copying of this communication is prohibited.

From: andrea stewart
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Reservoir
Date: Saturday, April 21, 2018 3:30:21 PM

Let's be clear about the 7 - 9 year wait for ANY reservoir to be built --- if the Lake O discharges continue, even on a limited basis, there will not be any living creatures left in our beautiful waters. We MUST STOP DUMPING algae ridden, harmful run-off, etc. into ANY estuary, river, canal, etc.

I believe the reservoir needs to be larger in order to almost eliminate the need for harmful discharges that kill the beauty of our environment.

This has taken far too long to resolve. Our waters are a precious natural resource; let's save our home.

Sincerely yours,

Andrea Stewart
Hobe Sound, FL

"Dream like you will live forever, Live like you'll die tomorrow. " James Dean

From: Bill Goodman
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Everglades Agricultural Area (EAA) Storage Reservoir
Date: Sunday, April 22, 2018 1:55:11 PM

The EAA sounds like a good start toward resolving the water problems surrounding Lake O and the harmful discharges into the Caloosahatchee River basin.

Bill Goodman

From: Bob Gibbons
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Enlarge Reservoir
Date: Wednesday, April 18, 2018 8:50:41 AM

We need to totally eliminate discharges from Lake O into the St. Lucie and Loxahachee estuaries. Thus, the Reservoir and wetland filters need to be much larger than current proposal.

Use state-owned land even if that requires cancelling agricultural leases and/or revive eminent domain.

There are far more businesses, livelihoods, families and economics negatively impacted fro the discharges than there are farmers & agri-workers in the EAA. Those in the EAA impacted by expanded reservoir should be assisted in relocation & job training.

Sincerely,

R.A. Gibbons

Business Broker and Lic. RE Agent

Palm Beach Gardens, FL 33410

Sent from Mail <Blockedhttps://go.microsoft.com/fwlink/?LinkId=550986> for Windows 10

<Blockedhttp://www.avg.com/email-signature?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=emailclient> Virus-free. Blockedwww.avg.com <Blockedhttp://www.avg.com/email-signature?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=emailclient>

From: Alex Gillen
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] comments on environmental review of State's EAA reservoir study
Date: Monday, April 30, 2018 5:16:53 PM
Attachments: Bullsugar Alliance EAA Reservoir NEPA scoping letter 3.30.2018.docx

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Hello,

Please find attached comments on the environmental review of South Florida Water Management District's Everglades Agricultural Area (EAA) storage reservoir study for Bullsugar Alliance.

Please let me know if you have any questions.

Best,

Alex Gillen

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This electronic transmission contains information which is confidential and/or privileged. The information is intended for use only by the individual, group, or entity named above. If you are not the intended recipient (or the employee or agent responsible for delivering this information to the intended recipient), you are hereby notified that any use, dissemination, distribution, or copying of this communication is prohibited.

April 30, 2018

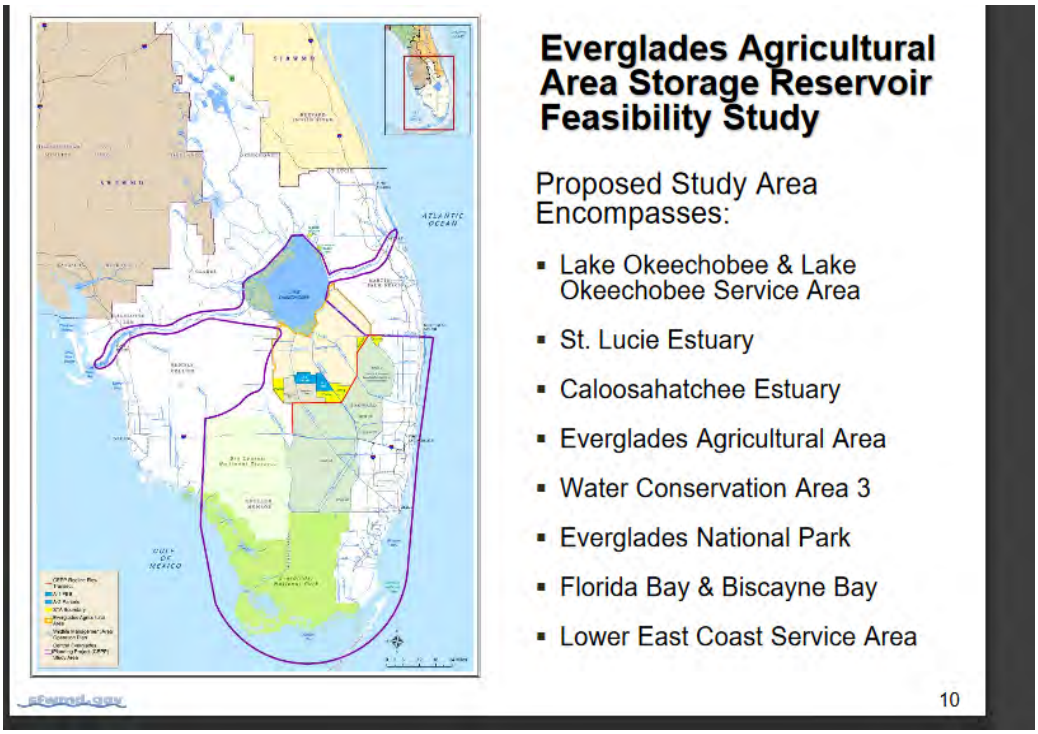
Ms. Stacie Auvenshine
U.S. Army Corps of Engineers Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019
Stacie.J.Auvenshine@usace.army.mil

Re: Everglades Agricultural Area Environmental Impact Statement

Dear Ms. Auvenshine,

This letter is to assist the U.S. Army Corps of Engineers (USACE) in drafting the Environmental Impact Statement (EIS) to evaluate and document potential environmental effects of the South Florida Water Management District (SFWMD) proposed plan for the EAA reservoir, in accordance with the National Environmental Policy Act (NEPA).

Project Area:
The project area for the EAA reservoir, as shown on the map below from the October 23, 2017 meeting at the SFWMD, is too narrowly drawn to adequately account for the environmental impacts of the project.[1]



[1] South Florida Water Management District, *Everglades Agricultural Area Feasibility Study*, at 10, https://www.sfwmd.gov/sites/default/files/documents/pres_2017_1023_eaa_res_scoping_meeting.pdf (accessed April 24, 2018).

The impetus for passage of Senate Bill 10 (SB10) was excessive freshwater and toxic algae plaguing two communities, while a third community was starved for water. This led to the governor declaring a State of Emergency in 2016.[2] The economic and environmental impacts of this mismanagement were felt throughout these communities along the St. Lucie River, Caloosahatchee River, and Florida Bay. Yet, the project area proposed by SFWMD does not include these surrounding communities.

Choosing to not include areas affected by the project is failing to do proper analysis. By pretending beaches in Lee, Martin, Palm Beach, and St. Lucie Counties are not affected, this analysis of the environmental impacts of the discharges is insufficient. For instance, the PACR claims that E.O. 13089 Coral Reef Protection is not applicable because "coral reefs are not affected." But coral reefs exist at Bathtub Reef Beach in Martin County where discharged water closed beaches in 2016.[3][4]

Omitting Hutchinson Island, Bathtub Reef Beach, Stuart Beach, Fort Myers Beach, Sanibel Island, St. Lucie Inlet Preserve State Park, and the Pine Island Aquatic Preserve (to name a few) from the project area understates the benefits of this project. Failure to include these areas in the project area will harm the cost benefit calculation of the project by underestimating the benefits to these harmed areas.

Fish spawning success in Florida Bay is impacted by freshwater flows from the Everglades, which will increase as result of the EAA reservoir project. Fish population recruitment in Florida Bay impacts the economic and ecological environments to at least Key West. By including Key West and Marathon in the project area, proper accounting of the human effects to the environment can be more accurately considered.

Please add all of St. Lucie, Martin, Lee, and Palm Beach Counties to the project area for the EAA reservoir project. Please also extend the project area southward to include Marathon and Key West.

Modeling the alternative:
The Battelle March 12, 2018 independent peer review of the SFWMD's Post Authorization Change Report (PACR) recommended in Final Panel Comment 2 that a much larger reservoir and stormwater treatment area needed to meet water quality standards while delivering project benefits should be evaluated. Please address this alternative as the report suggests.

Jobs Affected:
Please consider the jobs affected in Martin, Lee, Monroe, Hendry, Palm Beach, St. Lucie Counties as a result of this project. Please also see Appendix A, which notes over $4 billion in economic output by the 4 counties declared by Gov. Rick Scott in 2016 to be in a "State of

[2] Fla. Stat. § 373.4598 (2017).
[3] Martin County Florida, *Bathtub Reef Beach*, https://www.martin.fl.us/BathtubReefBeach (accessed April 24, 2018).
[4] CBS12, *Bathtub Reef Beach Closed Due To Toxic Algae*, http://cbs12.com/news/local/bathtub-reef-beach-closed-due-to-blue-green-algae (accessed April 24, 2018).

Emergency" as a result of the discharges. Please include direct, indirect, and induced jobs. Please publish your findings.

Health impacts of toxic algae:
Please consider the human health impacts associated with toxic algae discharges, including those containing beta-Methylamino-L-alanine (BMAA). Please also consider the human health impacts of toxic algae in Lake Okeechobee to the communities south of the Lake that use lake water for their drinking water supply. Please study and conduct analysis of the human health impacts from eating marine animals exposed to toxic algae, as occurred last summer in Lake Okeechobee and the St. Lucie River. Please study and conduct analysis of the human health impacts from swimming in toxic algae, as occurred last summer in Lake Okeechobee and the St. Lucie River. Please address the effects of toxic algae on the commercial catfish industry in Lake Okeechobee. Please include analysis regarding what is being done to address the health concerns from eating Lake Okeechobee fish exposed to toxic algae. Please publish all of your findings from these studies.

Species:
Please consider and study the impact of this project on all state and federal threatened, endangered, and species of special concern in the updated project area, and the effects on the habitat from the discharges within the project area. Please document in the study how the habitat of the marine species in the northern estuaries will benefit from reduction of discharges. Specifically, please consider the use of the St. Lucie Estuary and Indian River Lagoon by the Smalltooth Sawfish. Please consider how discharges affect the Bigmouth Sleeper and Opossum Pipefish in the St. Lucie River. Please consider how discharges affect the worm reefs near the St. Lucie Inlet. Please publish your findings for all of these items.

Sailfish Flats:
The Sailfish Flats are located in Martin County off Sailfish Point on Hutchinson Island.
The Sailfish Flats are directly in the path of the discharges and should be considered in the study area. Please study the benefit to the Sailfish Flats as a result of a reduction of discharges. Please include in your analysis the economic and ecological benefit to the community as a result of a healthy Sailfish Flats. Please include what species use the Sailfish Flats for foraging and spawning and how they will benefit from a reduction of discharges. Please publish your findings.

Bathtub Reef Beach:
Bathtub Reef Beach is located in Martin County on Hutchinson Island. The proposed project area for the EAA reservoir does not include Bathtub Reef Beach in the project area for the feasibility study. This is a remarkable omission, because waves of toxic algae on Bathtub Reef Beach were a driving factor in the passage of SB10. To exclude Bathtub Reef Beach in the study area is to say that Bathtub Reef Beach will not benefit from the creation of the EAA reservoir. Please include Hutchinson Island in the study area for this project. Please consider the ecological and economic benefits to Bathtub Reef Beach from the reduction of discharges. Please publish your findings.

Conveyance:
Please model dedicated conveyance to the EAA reservoir. Please include in the analysis a scenario where the total capacity of the dedicated conveyance is equal to the combined capacity of the C-43 and C-44 canals. Please include in your analysis whether and how a third high-capacity outlet from Lake Okeechobee will affect the safety of the Herbert Hoover Dike and the communities located south of the lake, specifically addressing risk factors associated with the dike overtopping with water, as occurred with Hurricane Wilma. Please include information and analysis regarding the legal and technical requirements for dams to include a spillway. Please consider the economic value dedicated conveyance would provide to the dam safety work. Please publish your findings.

Home Values:
Please analyze the effects of toxic discharges to local government tax base as a result of the discharges in Martin, Lee, St. Lucie, and Palm Beach Counties. Please publish your findings.

Biscayne Aquifer:
Please consider the effect of the EAA reservoir project on the Biscayne Aquifer, specifically considering how the reservoir will help recharge the aquifer. Please publish your findings.

Lake Okeechobee Regulations Schedule:
Please consider how the EAA reservoir would function with different regulation schedules. Specifically, consider a scenario where human health is the highest priority for managing Lake Okeechobee. Please publish your findings.

Please study the effects to the health and sustainability of Bass and Crappie fishery when Lake Okeechobee levels are increased above 16 feet. Please publish your findings.

Agricultural jobs:
Please analyze and document the effect on agricultural jobs as a result of the EAA reservoir project. Please publish your findings.

Conclusion:
Thank you for considering these matters.

We are willing and available to work with you and provide technical assistance to further this project. Please do not hesitate to contact me if we can be of further assistance.

Sincerely,

Alex Gillen
Bullsugar Alliance

Appendix A

Economic Contribution of Marine Industries [1/] in Four Counties Declared in 2016 by Gov. Rick Scott to be in a "State of Emergency" from Lake Okeechobee Discharges and Algal Blooms [2/]

	Total Output [3/]	Total Job Impact [4/]	Labor Income [5/]
Lee County [6/]	$1,273 million	9,014	$486 million
Martin County [7/]	$324 million	3,290	$230 million
Palm Beach County [8/]	$1,884 million	18,220	$682 million
St. Lucie County [9/]	$549 million	6,390	$366 million
Total	$4.030 billion	36,914	$1.764 billion

[1/] Marine industries include construction of marine-related infrastructure and facilities; living resources represented by fishing, aquaculture, seafood processing, and seafood markets; offshore minerals, consisting of limestone, sand, and gravel mining, as well as oil and gas exploration and production; ship and boat building, including repair; tourism and recreation, including accommodations and services associated with recreation in coastal areas, such as marinas, boat dealers, amusement and recreational facilities, hotels, restaurants, and sporting goods retailers, and; transportation, including marine passenger and cargo transportation services, and, search and navigation equipment (source: Hodges et al. 2015, cited at note 6/ below).

[2/] "Emergency Management—Lake Okeechobee Discharge." Executive Order Number 16-156, State of Florida Office of the Governor, June 30, 2016, accessed at http://www.flgov.com/wp-content/uploads/orders/2016/EO_16-156.pdf

[3/] Total output includes gross revenue directly from marine industry activities, plus multiplier effects from the input purchases associated with supply chain activities, known as indirect effects; the induced effects from employee and proprietor household spending of earned income and profits; and government expenditures.

[4/] Total job impact includes direct employment in marine industries plus multiplier effects from jobs in supporting indirect and induced activities.

[5/] Labor income includes wages and salaries paid to employees in marine industries plus multiplier effects from wages and salaries in supporting indirect and induced activities.

[6/] Hodges, A.W., T.J. Stephens, and C. M. Adams. 2015. Economic contributions of marine industries in southwest Florida, Table 10. Food and Resource Economics Dept., University of Florida, Gainesville, 29 p., accessed at https://eos.ucs.uri.edu/EOS_Linked_Documents/flsgp/Chuck%20Adams_2015_2.pdf

[7/] East Central Florida Regional Planning Commission and Treasure Coast Regional Planning Commission. 2016. Indian River Lagoon valuation update, 2016, Tables 15 and 18, 54 p., accessed at http://www.tcrpc.org/special_projects/IRL_Econ_Valu/FinalReportIRL08_26_2016.pdf

[8/] Thomas J. Murray & Associates, Inc. 2014. Economic impact of the recreational marine industry Broward, Dade, and Palm Beach Counties, Florida, 2014. Report prepared for Marine Industries Association of South Florida, Executive Summary, Table III, 5 p., accessed at https://mlsvc01-prod.s3.amazonaws.com/bd373c16001/037871fe-351d-422d-bbc1-146c06bc6521.pdf

[9/] See note 7/above.

From: Cara Capp
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] EAA Reservoir EIS Scoping Comments
Date: Monday, April 30, 2018 4:30:42 PM
Attachments: EAA Reservoir Army Corps EIS Scoping -- April 2018.pdf

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Please find the attached scoping comments from 18 stakeholder organizations on the Corps' development of an EIS for the EAA Reservoir Project.

Feel free to contact me anytime should have any questions.

Best,

Cara

Cara Capp

Everglades Restoration Program Manager | National Parks Conservation Association

305.546.6689 | ccapp@npca.org <mailto:ccapp@npca.org> | npca.org

Preserving Our Past. Protecting Our Future.
Speak up for national parks. Join us at npca.org

Stacie Auvenshine
U.S. Army Corps of Engineers
Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019
Stacie.J.Auvenshine@usace.army.mil

April 30, 2018

Re: Everglades Agricultural Area Reservoir

The undersigned organizations write in support of the Army Corps' development of an Environmental Impact Statement for the South Florida Water Management District (SFWMD) Everglades Agricultural Area (EAA) Reservoir Feasibility Study. The EAA Reservoir is an integral component of the Comprehensive Everglades Restoration Plan and the hydrological benefits described in the SFWMD Feasibility Study are significant in achieving reduction of harmful discharges to the Caloosahatchee and St. Lucie estuaries and increasing freshwater flows to Everglades National Park and Florida Bay.

To ensure that the hydrologic benefits of the reservoir are realized simultaneously with meeting the Water Quality Based Effluent Limits (WQBEL), it is important that the Corps of Engineers incorporate into the Reservoir planning documents the water quality assurances included in the March 2018 Florida Department of Environmental Protection Secretarial Order.

We greatly appreciate your expedited review of this critical restoration project so that a Post Authorization Change Report (PACR) can be included in the 2018 Water Resources Development Act (WRDA) for Congressional authorization and the benefits of this project realized as quickly as possible.

The undersigned organizations and many others have remained engaged through the rigorous schedule of public meetings and information sessions that have taken place since the initiation of this planning project in October of 2017. We thank you for the opportunity to comment and look forward to additional opportunities to provide input during the federal review process.

Sincerely,

Celeste De Palma
Director of Everglades Policy
Audubon Florida

Mimi Wolok
Executive Director
Audubon of the Western Everglades

Pete Quasius
Board of Directors
Audubon of Southwest Florida

Capt. Daniel Andrews
Executive Director
Captains for Clean Water

Marisa Carrozzo
Senior Environmental Policy Specialist
Conservancy of Southwest Florida

Thomas Van Lent, Ph.D.
Vice President of Science and Education
The Everglades Foundation

Charles Causey
President
Florida Keys Environmental Fund

Manley Fuller
President
Florida Wildlife Federation

Tom Bausch
Board of Directors
Martin County Conservation Alliance

George L. Jones
Government and NGO Policy Advisor
Ocean Research & Conservation Assn.

Alex Gillen
Policy Director
Bullsugar Alliance

Jaclyn Lopez
Florida Director
Center for Biological Diversity

Michael J. Baldwin
President
"Ding" Darling Wildlife Society

Lisa Interlandi
Senior Attorney
Everglades Law Center

Mark Perry
Executive Director
Florida Oceanographic Society

Elinor Williams
President
Friends of the Arthur R. Marshall Loxahatchee NWR

Cara Capp
Everglades Restoration Program Manager
National Parks Conservation Association

Rae Ann Wessel
Natural Resource Policy Director
Sanibel Captiva Conservation Foundation

From: Carmen Guido
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] reservoir
Date: Thursday, April 19, 2018 10:33:51 AM

Dear Stacie;

Are we really solving the problem or supporting the bribes our politicians are receiving..Seems like 10 years ago I voted to correct this problem but all I read about is the money given by big sugar to certain politicians.

Carmen Guido

From: Cindy
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] EAA Resevoir
Date: Tuesday, April 17, 2018 8:47:06 PM

Dear Ms. Auvenshine:

I am sending you my comments on the proposed EAA reservoir for Lake Ochechobee, Florida.

I am very concerned about 2 major problems with the proposed reservoir. First, it is way too small to substantially reduce toxic water flowing to the Gulf of Mexico or the Atlantic. No modeling appears to have been done to see if it will even work! Reducing toxic flow by barely half is simply not enough to help the estuaries and the everglades to recover. The toxicity of these flows gets worse ever year and this project hardly changes this.

Second, the proposed timetable is outrageously and inexplicably slow. We built the Hoover Dam in only 5 years! There will be nothing left to save given this protracted schedule!!

I hope the Army Corp of Engineers looks very thoroughly at these issues and requires a larger reservoir that will cut toxic flows more substantially-by 75% at least!

Thank you.

Sent from my iPhone

Collier Soil & Water Conservation District
Dennis P. Vasey, Chairman

3434 Hancock Bridge PKWY, STE 209B
North Fort Myers, FL 33903-7005

April 24, 2018

U.S. Army Corps of Engineers Jacksonville District
ATTN: Ms. Stacie Auvenshine
P.O. Box 4970
Jacksonville, FL 32232-0019

Re: Lake Okeechobee Reservoir

Dear Ms. Auvenshine,

Hatched in the final days of a legislative session after months of intense lobbying and championed by the powerful Senate president, Joe Negron, the plan called for construction of a large reservoir in western Palm Beach County aiming to do two things: Stop flushing foul water from Lake Okeechobee to the coasts, and fix the flawed re-engineering of South Florida's tropical wetlands by sending water south to wilting marshes and Florida Bay.

Initially, a grander version pitched by environmentalists envisioned 60,000 acres. It included a portion of sugar fields long blamed for pollution and jump-started construction on a sprawling shallow reservoir south of the lake intended to clean water before it reached Everglades National Park—a project approved in a landmark Everglades restoration plan in 2000. The massive footprint allowed plenty of shallow storage to clean the water, a strict requirement hammered out through years of litigation that forced the state to stop polluting the Everglades.

The legislative direction that landed on the drafting table of South Florida Water Management District managers was a reservoir on state-owned land below the lake. That meant squeezing a deeper reservoir onto a smaller footprint, with less land for cleaning water. The legislation also sacrificed the valuable option to buy sugar land, requiring the South Florida Water Management District to relinquish the state's only leveraging power to acquire more land—long before anyone knows for sure whether the down-sized reservoir and treatment marshes will work.

The District believes the proposed storage reservoir might not work; we're just going to have another Lake Okeechobee belching into the Everglades.

Respectfully,

Dennis P. Vasey

Dennis P. Vasey

Jim Lang
Supervisor, Seat 1

Nancy Richie
Supervisor, Seat 2

Dennis P. Vasey
Supervisor, Seat 3

Clarence Tears
Supervisor, Seat 4

Rob Griffin
Supervisor, Seat 5

Web Site: http://www.collierscd.org

From: cshell art
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Reservoir
Date: Sunday, April 22, 2018 7:00:21 PM

The proposed Lake Okeechobee reservoir has the potential to reduce harmful discharges into the Caloosahatchee River by 40 to 60 percent. Every resident of Southwest Florida, including myself, would like to see that happen. Thank you - Claudia Burns, Sanibel resident, Florida voter

Sent from Mail <Blockedhttps://go.microsoft.com/fwlink/?LinkId=550986> for Windows 10

From: Damon D. Hickey
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Lake Okeechobee reservoir
Date: Sunday, April 22, 2018 8:28:40 AM

Dear Stacie J. Auvenshine:

My wife and I were privileged on a recent visit to southwest Florida to take a short cruise with the Sanibel-Captiva Conservation Foundation (SCCF) into some of the oxbows along the Caloosahatchee River, in order to understand better the ecology of the river and its relationship to Lake Okeechobee. As a result of what we learned, we are writing in support of the construction of the proposed Lake Okeechobee reservoir, in order to reduce harmful discharges into the Caloosahatchee River. As you know, excessive amounts of fresh water flowing into the river severely impact the coastal and marine environment downstream, and while the reservoir may not be the perfect solution, it is a big step in the right direction. We strongly support its construction.

Damon and Mary Hickey
301 Miller Lake Rd
Wooster OH 44691-2372 USA
330-262-7059

From: DAVID CARLSON
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] EAA Reservoir
Date: Saturday, April 21, 2018 3:30:00 PM

TO: U.S. Army Corps of Engineers

FROM: David J. Carlson DVM

RE: Proposed Southern Everglades Reservoir

I am a practicing veterinarian who has been living on the North Fork of the St. Lucie River for over 15 years. I also work as a volunteer for the Florida Oceanographic Society testing water in the river on a weekly basis. The dramatic decline in sea grass, marine life and water quality that occurs when Lake Okeechobee is discharged east and west is profound.

The proposed 10,100 acre reservoir and 6,500 acre STA are a step in the right direction to curtail necessary discharges to the estuaries. The South Florida Water Management has done extensive modeling on this plan and I have confidence in their science, however, I believe there needs to be some accountability and an expanded plan should it be needed if reality does not match the model. I am disappointed more public land is not being taken out of production and used to increase the size of the reservoir and decrease the depth. The goal of this project must be to convey, store, and clean water to move south and not comingled with agricultural demands for flood control and irrigation.

The foundation of my background started in the dairy industry. I believe that agriculture and the environment can coexist but history has proven many mistakes have been made and we need to rectify these and future negative impacts to save the planet. Animal sentinels are shouting alerts as we discover sickness and death in places like the Indian River Lagoon and even the ocean. Protecting people and animals from lethal cyanotoxins must be given a high priority. The water from Lake Okeechobee is needed south of the lake and must be cleansed of its harmful nutrients. The proposed project as well as other storage and cleaning efforts around the lake will have a huge impact towards reaching the goal of a more balanced ecosystem

From: David Kapell
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] SFWMD proposal for EAA storage reservoir
Date: Thursday, April 19, 2018 4:34:02 PM

Dear Madam:

I support this plan, as opposed to doing nothing at all, which is what has been happening for far too long. However, I do not believe the project is good enough. It is just better than nothing.

The SFWMD is in the pocket of the sugar industry, which does not want any reduction in their farming. The SGWMD asserts that they could not build a larger reservoir, because nobody was willing to see any land. This is a specious argument, since the sugar industry uses public land in addition to private land. In order to build a larger reservoir, it is only necessary is to restrict their use of public land for farming. We would not have to purchase any land.

The SFWMD is misleading the public for the benefit of their friends in the sugar industry.

David Kapell

From: Preston, David
To: Auvenshine, Stacie J CIV USARMY CESAJ (US); Miller, Jennifer S CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] EAA Reservoir Comments
Date: Monday, April 16, 2018 4:06:15 PM
Attachments: image001.gif
image002.gif
image003.jpg
image004.jpg
image005.jpg
image006.png

I am in full support of the EAA Reservoir project as described in CERP. Water storage south of Lake O is arguably the heart of CERP, and without it we are looking at a +/-$20b Everglades Restoration plan that doesn't accomplish its goal and sacrifices the quality of life, environment, economies, and public health of our coastal communities. We cannot afford to kick the can down the road another day on this critical project and its much needed benefits to both the parched Everglades and coastal communities drowning in billions of gallons of polluted fresh water from Lake O on nearly an annual basis. The drinking water supply for 8 million FL residents is also at risk. I urge the ACOE and SFWMD to continue forward with the project, but am very concerned that the footprint was artificially constrained to appease the sugar industry, and that the benefits described by the SFWMD will not be realized. If these benefits are not realized, our taxpayer money has clearly not been well spent. Please leave no stone unturned in maximizing this once in a lifetime opportunity, and ensure that the benefits as described in the SFWMD's proposal are ENSURED. Thank you.

David Preston
Senior Managing Director

Newmark Grubb Knight Frank
1111 Brickell Avenue
Suite 2000
Miami, FL 33131

T 305.350.0933 M 786.384.1320
dpreston@ngkf.com <mailto:dpreston@ngkf.com>

<Blockedhttp://www.ngkf.com/>

<Blockedhttp://www.facebook.com/Newmarkkf> <Blockedhttps://twitter.com/ngkf>
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From: DAVID URICH
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc: David Urich
Subject: [Non-DoD Source] Need for INCREASED flow from EAA Reservoir under Tamiami Trail to Taylor Slough for Fla Bay - NOW!
Date: Thursday, April 26, 2018 8:54:27 AM

Dear Ms. Auvenshine;

While I am in full agreement with the SFWMD's EAA storage reservoir, there is a REAL problem with the need for INCREASED Flow to the South! Currently, while we have one bridge of a MILE in length, and a NEW 2.6 mile one under construction - there appear to be not REAL plans for INCREASED flow to the South, via Taylor Slough to Fla Bay - NOW!

Most of the year, the WCAs (Water Conservation Areas) are full and not able to receive water from the new EAA storage reservoir! That will greatly impact the ability to have normal flow through the whole system. It seems that constraints to flow under the Tamiami Trail are imposed due to the Cape Sable Seaside Sparrow's nesting periods as well as some attempts to keep water from the Las Palmas 8.5 mile "agricultural" area created some time ago in the actual Everglades.

Both of these issues need to be studied and corrective actions taken to insure that the NEW EAA Reservoir is able to have a meaningful flow in the entire system South of the WCAs. Otherwise, no meaningful flow will go through the Taylor Slough to Fla Bay! Rainwater alone will not restore the salinity balance needed for Fla Bay!

Sincerely, David A. Urich - Life Member of the Responsible Growth Management Coalition, Inc.

From: DAVID URICH
To: thayden@news-press.com; cmcross@gannett.com; cgillis; Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc: David Urich; tedwards@sfwmd.gov; emarks@sfwmd.gov; pflood@sfwmd.gov; shannon estenoz; Kirk, Jason A COL USARMY CESAJ (US); allyn childress; astone@agwt.org
Subject: [Non-DoD Source] PULL the PLUG - SEND Water to Fla Bay, NOW!
Date: Sunday, April 29, 2018 5:26:23 PM
Attachments: URICH-Las Palmas - PULL PLUG.jpg
URICH-TODAY Link Fla Bay.jpg
URICH-pull PLUG 12-30-17.jpg
URICH-NO Deep Well Injection.jpg
Urich - Picture.jpg

In response to Chad Gillis' good News-Press article of 4/29/18 regarding DIW (/Deep Injection Wells) I have to raise my voice again to declare that DIW is just a BAD idea! The TRUE problems are CONSTRAINTS on REAL FLOW under the one mile Tamiaimi Trail Bridge and the LACK of a PLAN for an INCREASED Flow for the about to be completed NEW 2.6 mile Bridge! Because of these constraints - the WCAs (Water Conservation Areas) remain FULL in the wet season, thus backing up the WHOLE flow system! Flow is thus constrained from Lake "O" causing it to rise to dangerous levels! THAT is why massive discharges have been sent down BOTH rivers!

Originally the SFWMD plan called for some 150 such DIW installations - this has now been reduced to a MERE 50! This REDUCED plan will cost some $330 MILLION - for planning, permitting & construction, with some $10 Million in annual operating costs! What about the geological danger of 50 such wells in such a small geological area? Could they possibly create a "Swiss Cheese" danger zone of potential collapse of the aquifer? Not to mention that the proposed DIWs are to be operated on an "as needed" basis and will thus be DRY for most of the year! Has anyone studied potential STRUCTURAL weakness due to lack of usage? Other such wells are in CONSTANT use, and are NEVER normally left DRY! They ALSO are widely spread around the State of Fla, not so MANY in one area!

Most of the year, the WCAs (Water Conservation Areas) are FULL and thus will not be able to receive water from the new EAA proposed storage reservoir! That fact continues to greatly impact the whole Lake "O" system's ability to have anything resembling normal flow down to Fla Bay! It seems that constraints to REAL flow under the Tamiam Trail Bridge are imposed due to the Cape Sable Seaside Sparrow's nesting period in the wet portion of the year - as well as some attempts to keep water from the Las Palmas 8.5 mile "agricultural" area created some time ago in the actual Everglades. Yet we are about to finish a NEW 2.6 mile bridge with no apparent plan to INCREASE needed FLOW!

Current Everglades restoration plans will reduce the amount of harmful Lake "O" discharges by about 61 percent, it is reported. It seems that trying to get that up to 77 percent is probable OVERKILL! The same money spent to deal with the Tamiami Trail constraints would be ELIGIBLE for FEDERAL match, and would ALSO help save Fla Bay, NOW! Instead of DISPOSAL of this good water - the SFWMD should join with the Army Corps to DEAL with the South Constraints and lack of capacity in the system, NOW! Let's SAVE this water and get it to where it is needed to SAVE FLA BAY! We have spent some $12 Million on the C-111 Spreader project, yet this essential path to Fla Bay via Taylor Slough is NOT operating at design capacity! Why NOT??

All of these complex issues need to be studied and corrective actions taken to insure that the NEW EAA Reservoir will be able to have a meaningful flow to the entire system South of the WCAs, NOW! The water that has been "going to tide" should NOT be disposed of via DIW - it is NEEDED in the system, NOW! Rainwater alone can NOT restore the salinity balance in Fla Bay!

David A. Urich, Life Member of the Responsible Growth Management Coalition, Inc.

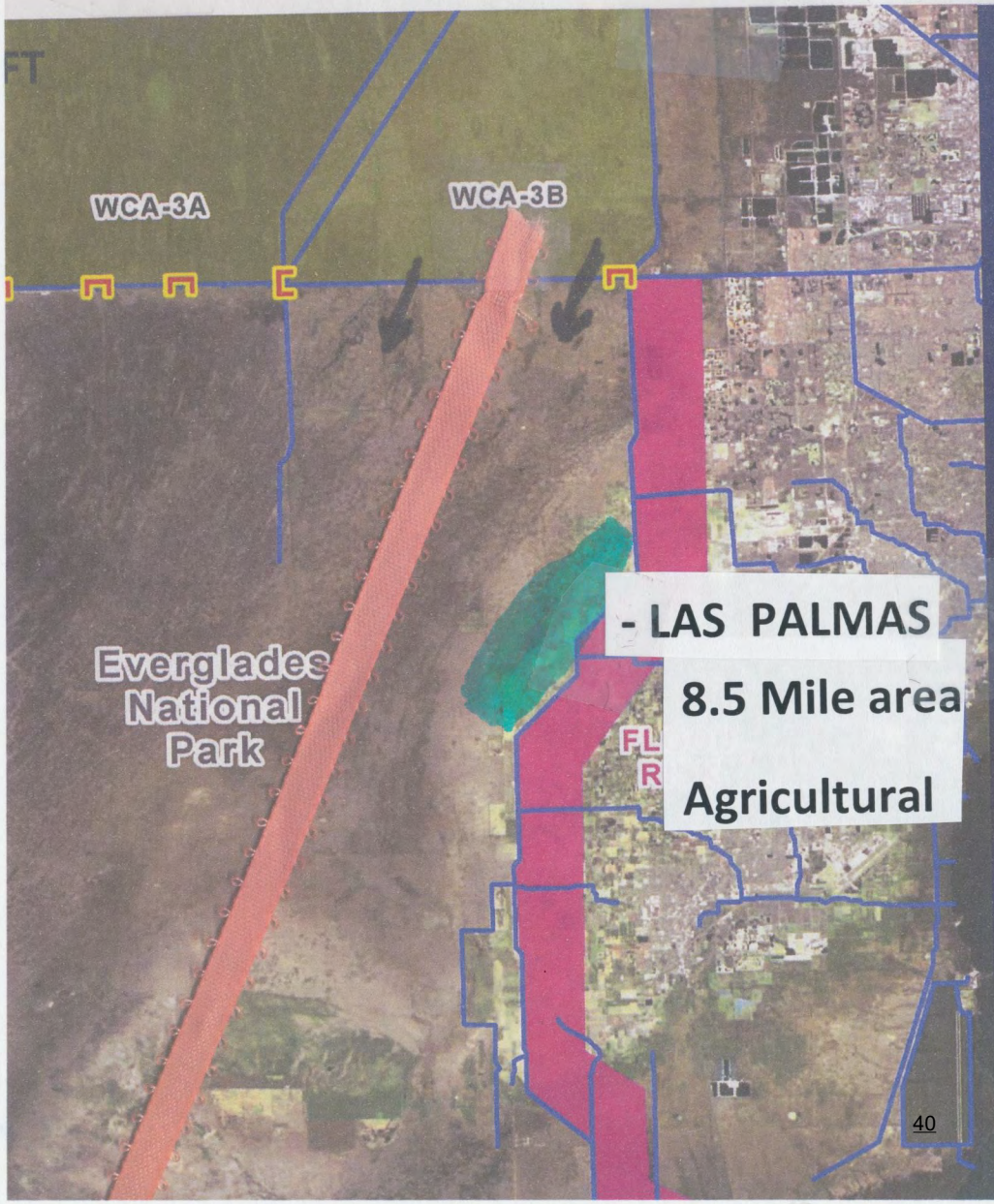
and the SFL Clean Water Movement,

My email is: d.urich@comcast.net <mailto:d.urich@comcast.net> and my cell is (239) 850-2413

PS: I have attached some four graphs that I have made which help show these concepts, also a file picture of myself if needed.

PULL PLUG , NOW !

Water Conservation Area



FLOOD RISK:

South Dade Conveyance System

A primary mission of the C & SF Project is flood control. Many of the canals , levees and pumps were built, and still must be operated, for that specific purpose. As more water is sent to Everglades National Park, facilities have to be in place to make sure flooding is not made worse for the private property east of Everglades National Park.

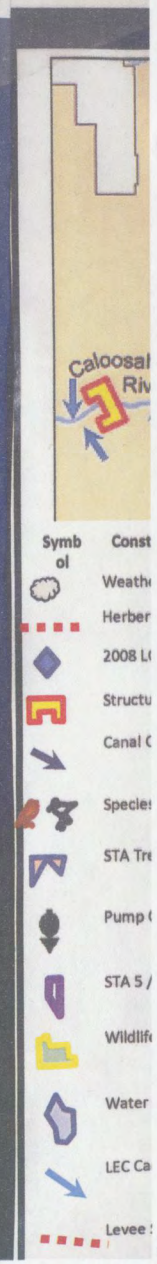
This is a key constraint on the design and operation of the Modified Water Delivery and C-111 Projects. These projects were not designed with an assumption of significant additional water coming through the Everglades from Lake Okeechobee.

Groundwater seepage from the Park is a chronic, existing problem, and significantly more water would only add to the challenge.

Current Initiatives:

Completion of Contract 8 & 9 of C-111 South-Dade

Operation of Mod Waters and C-111



DON'T DESTROY Fla Bay's GOOD WATER !

Deep Well Injection

Use Nature's Way!

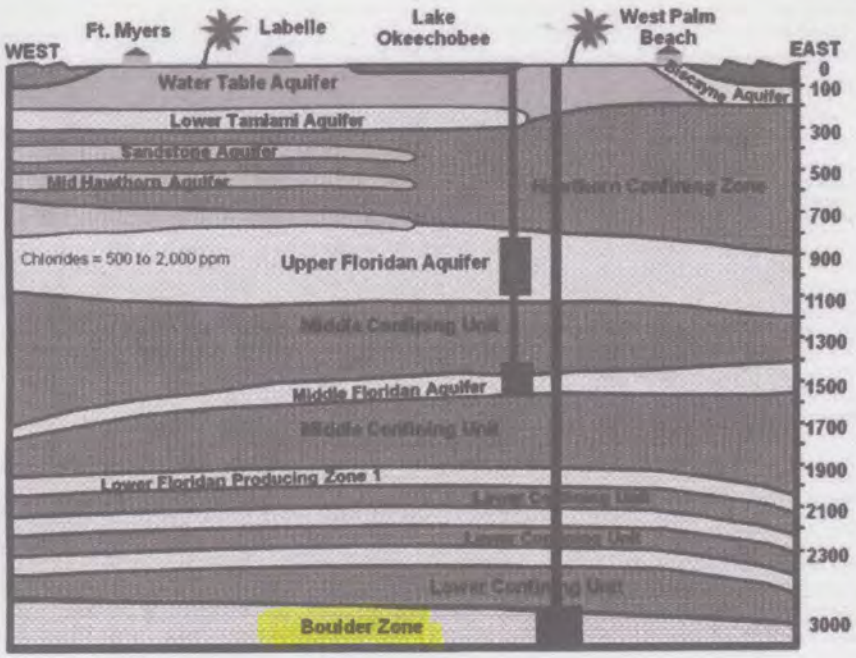
New Everglades plan calls for flushing water in wells deep underground

BAD IDEA - 150 DEEP INJECTION WELLS

By Jenny Staletovich
jstaletovich@miamiherald.com

A new plan is emerging in the political calculus over Everglades restoration: Rather than store, treat and move water into South Florida's parched Everglades, water managers are now considering flushing millions of gallons deep underground near Lake Okeechobee.
The deep injection wells would help control the level of water in the lake during the rainy season, protect its aging dike and help eliminate the need to flush dirty lake water to either coast, which last year outraged residents and business owners when it triggered smelly toxic blooms and killed fish. But environmentalists say it would do nothing to help fix the south end of the Everglades and instead waste valuable water that original restoration plans called for saving.
If we inject that water underground, we only take care of half the problem.
Audubon Florida scientist Paul Gray
"If we inject that water underground, we only take care of half the problem," said Audubon Florida scientist Paul Gray. "The scale that we're talking about here has never been contemplated or done before. ... We're talking something very untested."
They also worry the plan is meant to undermine a push to build a massive reservoir south of the lake backed by Republican Senate President Joe Negron, whose hometown has been hammered by the lake releases, but opposed by powerful sugar farmers.
At a meeting Wednesday, the U.S. Army Corps of Engineers, which is in the midst of mapping out fixes for the Lake Okeechobee watershed, provided an update on alternatives in a planning process expected to take three years.While solving the water storage problem relies heavily on building a series of reservoirs around the lake - which originally provided much of the freshwater flowing south into South Florida - the plans also call for constructing wells that store and recover water as well as the injection wells that dump water in the boulder zone beneath the Florida aquifer.

The Everglades may be in trouble, wilted by decades of flood control and facing growing risk from sea rise driven by climate change. If freshwater is not restored soon, there is a fear the region will begin a self-replicating cycle of decline.

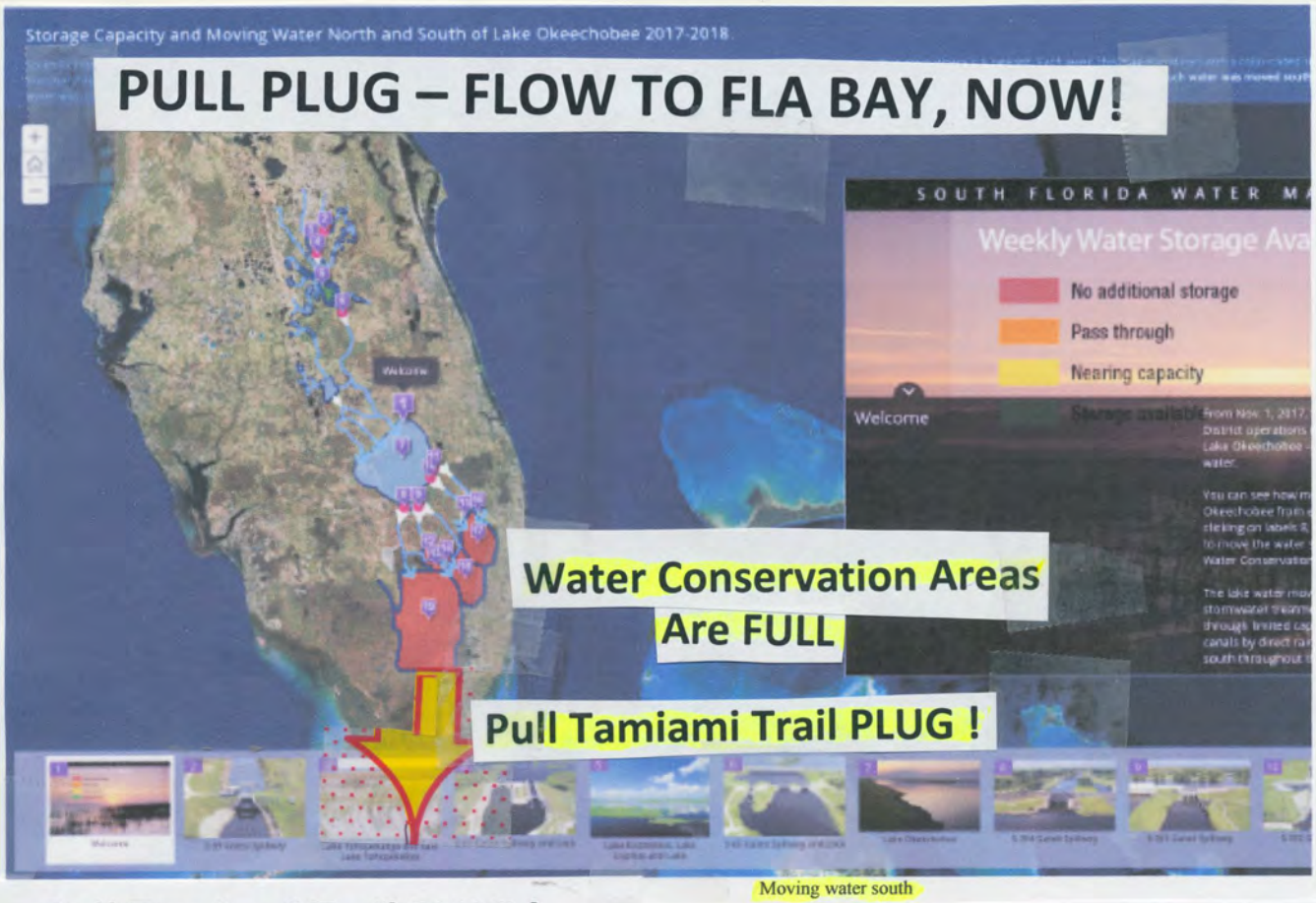


DEEP WELL IDEA VERY UNTESTED !

Fla Bay Too SALTY

We Just Spent some $20 MILLION on C-111 Spreader, The Headwaters of Fla Bay FEEDS from Taylor Slough

Graphic courtesy South Florida Water Management District.
He said people always want to know how efficient ASR wells will be, since freshwater is pumped into the brackish water of the aquifer. The Kissimmee ASR pilot project had 100 percent recovery, Mr. Verrastro said. He said the Floridan aquifer water is fairly fresh, so they did not have a problem with the freshwater mixing with brackish water found in some ASR projects in other areas.
"Those same conditions pretty much apply throughout the Lake Okeechobee area," he said.
"The water we pump into an ASR well has to go through a filtration and treatment process," he said. "It has to meet drinking water standards, which we were able to do."
"At the Kissimmee ASR system, we found that we are using very lightly treated surface water, it is very stable water," he said.
"Both ASR technology and deep water injection look very promising in our planning process to reduce discharges to the northern estuaries," said Matt Morrison, federal policy chief.
"We're getting one management measure, and that is above ground storage.
If we are really going to reduce the damaging discharges to the Calooshatchee and St. Lucie estuaries, we need storage," said Mr. Morrison.
"We know we need storage north of the lake. We need storage south of the lake. We know we need storage east and west of the lake.
"The good news is we have construction of storage currently taking place on both the Caloosahatchee and the St. Lucie and the Central Everglades Planning Project, which includes storage south of the lake, was recently approved by Congress for upcoming implementation.
He said about 700,000 acre feet of storage is needed north of the lake.
LOWP project performance measures include:
* Increase water storage capacity in the watershed increasing improved Lake Okeechobee water levels, and reducing the damaging high water levels;
* Improving the quantity and timing of discharges to the St. Lucie and the Caloosahatchee estuaries which adversely affect salinity;
* Creating habitat to increase extent and functionality of freshwater wetlands; and,
* Improve water supply for existing legal users.
Components of LOWP includes above ground reservoirs, ASR, deep well injection and wetland and flood plain restoration. Areas currently under evaluation for reservoirs are west of the Kissimmee River.
Options considered are reservoirs to provide 150,000 acre feet to 300,000 acre feet of above ground storage.
He presented documentation which showed a combination of 250,000 acre foot reservoir and 80 ASRs and 150 deep injection wells could reduce the estuary flows by 82 percent. Total cost for that option is estimated at $3.7 billion.
"We're going to continue to move forward and develop a project plan north of the lake that is going to really help minimize those damaging discharges from Lake Okeechobee that contribute to undesirable conditions in both the St. Lucie and the Caloosahatchee."
"I appreciate this presentation today, as well as the outstanding research of our engineers and hydrologists," said WRAC Chairman Jim Moran. "Multi-faceted storage north of Lake Okeechobee provides a cost-effective, flexible strategy to meet environmental and water supply goals in South Florida."



Moving water south

Pull Tamiami Trail PLUG !

"When are we going to restore the historic flow from Lake Okeechobee to Fla Bay? A new 2.6 mile Tamiami Trail Bridge is under construction, Yet the existing one mile bridge is nowhere near flow capacity. It seems that the U.S. Department of the Interior has restrictions which constrain the water flow. But the huge, three Water Conservation Areas are full of low phosphorus water. As I have said before: 'Pull the plug' and allow South flow. Today, more water is urgently needed for Florida Bay to restore proper salinity. Taylor Slough feeds the historic headwaters of Florida Bay, and thus is the best for today's flow restoration needs. Some $12 million has been spent on C-111 Spreader, yet this essential path to Taylor Slough is not operating at capacity."

Excerpt Ft Myers News-Press 12/28/17 – by David Urich.

239-850=2413
David Urich
3919 McKinley Ave.
Fort Myers, FL 33901
d.urich@comcast.net

From: Diana Umpierre
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc: Cris Costello (Sierra)
Subject: [Non-DoD Source] Sierra Club Comments for USACE on developing the EIS for EAASR
Date: Monday, April 30, 2018 5:19:44 PM
Attachments: SierraClub_Comments_EAA Reservoir_Scoping_11 22 17.pdf
SierraClub_Letter-to-SFWMD_Qs-following-Feb-8 presentation_02 09 18.pdf
SierraClub_Questions-ReSubmitted-to-SFWMD_on_03 08 18.pdf

April 30, 2018

Stacie Auvenshine
U.S. Army Corps of Engineers
Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019

SUBJ: Comments on USACE's development of an Environmental Impact Statement (EIS) for the SFWMD's EAA storage reservoir study

Dear Ms. Auvenshine:

On behalf of the Sierra Club, we would like to provide a copy of comments and questions that we previously provided to SFWMD while they were developing their Tentatively Selected Plan (TSP) for the EAA Storage Reservoir and associated Central Everglades Planning Project Post Authorization Change Report (PACR). These are missing from the PACR, the Integrated Feasibility Study, and the Draft Environmental Impact Statement (FS/DEIS) that SFWMD submitted to Assistant Secretary of the Army for Civil Works on March 26, 2018. This information is missing and is not addressed in the PACR's Appendix C where comments and letters from other stakeholders were included and addressed. Since our input is missing, we are concerned that other stakeholder input might also be missing.

* Nov 22, 2017 Letter with our written scoping comments on the EAA storage reservoir
* Feb 9, 2018 Letter with questions prompted after SFWMD presentation to the Governing Board on February 8, 2018
* Re-submission of February 9, 2018 letter questions and February 22 and 29 questions which remained unanswered.

We look forward to reviewing and providing additional comments once the draft Environmental Impact Statement is available for public input.

Sincerely,

Diana Umpierre

Diana Umpierre, AICP

Organizing Representative

Everglades Restoration Campaign

Sierra Club

e: diana.umpierre@sierraclub.org <mailto:diana.umpierre@sierraclub.org>

c: (954) 829-7632

Explore, enjoy and protect the planet

SIERRA CLUB

November 22, 2017

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

SUBJ: EAA Reservoir Project Scoping Comments

Dr. Mr. Albert:

On behalf of Sierra Club, we would like to submit the following comments and questions as part of the scoping of the Everglades Agricultural Area (EAA) Reservoir Project.

Background

The EAA Reservoir is an integral component of the Comprehensive Everglades Restoration Plan (CERP), which will help solve Florida's ongoing water crisis while restoring the globally unique and invaluable Everglades ecosystem. Florida's coastal waters have long been on the brink of ecological collapse. Billions of gallons of water continue to be discharged from Lake Okeechobee to the St. Lucie and Caloosahatchee estuaries, wasting valuable freshwater needed elsewhere and that is vital to Florida's environment and economy. The extreme freshwater discharges have upset the natural salinity balance in the estuaries needed for oysters, seagrasses, and other aquatic species to survive. The discharges have also carried high levels of nutrients and sediments, causing and contributing to harmful algae blooms, smothering native vegetation, and harming fish and coastal birds. The estuaries' famously clear coastal waters have turned dark brown and green, driving away tourists, damaging local businesses, and reducing home values. Scientists have even detected harmful bacteria in some areas, making the water dangerous for contact with people, pets, and livestock.

At the same time, insufficient freshwater flow to the Southern Everglades caused a substantial seagrass die-off in Florida Bay in 2015 that resulted in the loss of more than 50,000 acres of seagrass in Everglades National Park. The once blue waters looked like pea soup and negatively affected recreational and commercial fishing as well as other water-related activities that bring tourists to the Florida Keys. If this situation persists and is not addressed as quickly as possible, the prediction for Florida Bay is an even deeper collapse.

Increasing storage throughout the Everglades watershed is key to getting the water right on the north and south end of the ecosystem. With storage projects west and north of Lake Okeechobee

already in the planning phase, and given these ongoing emergency conditions, the Sierra Club strongly supports advancing the EAA Reservoir project to provide relief to the ecosystem as envisioned by CERP in 2000.

Our comments and questions below are based on our understanding of the limited information presented thus far via public meetings, which have included substantial repeated information and were held in less than a 1-month period between October 23 and November 16, 2017.

Project Objectives, Scope and Study Area

We agree with the District's dual project objectives of reducing high-volume freshwater discharges to the northern estuaries and identifying storage, treatment, and conveyance south of Lake Okeechobee to increase freshwater flows to the Everglades and Florida Bay. Working toward these goals contemporaneously will lead to a more holistic solution that benefits the entire Greater Everglades, versus segmenting into smaller regions and failing to consider system-wide impacts.

That said, it must be recognized in the project planning process and in the weights assigned to project evaluation criteria and benefits, that SB 10 was introduced and passed in recognition that high-volume freshwater discharges to the St. Lucie and Caloosahatchee estuaries are an emergency and a disaster that must be resolved. Therefore, project alternatives should be weighted accordingly to ensure reduction of these high-volume discharges as much as possible. To achieve this goal, the planning process must include identifying adequate land acreage for stormwater treatment to ensure the maximum possible reduction of discharges.

We urge the District to expand the project study area to include all areas that are adversely affected by high-volume lake discharges as well as all areas that will benefit from this project, or clarify if these are already included. The study area for the EAA Reservoir Project, as outlined by the District in its October 23, 2017 meeting, does not appear to include most of areas that are known to be adversely affected by high-volume lake discharges in Martin and St. Lucie Counties, including Hutchinson Island (slide 10 of meeting presentation). A similar omission was noted along the Caloosahatchee and its estuary. The District should be consistent with the study area identified for the Central Everglades Planning Project (CEPP) to ensure that the entire range of the ecosystem, from Lake Okeechobee to Florida Bay, is included in the scope of work and project benefits analysis.
https://www.sfwmd.gov/sites/default/files/documents/pres_2017_1023_eaa_res_scoping_meeting.pdf.

It is also critical to include the economic and ecologic impacts of high-volume Lake Okeechobee discharges to the northern estuaries. Ignoring these would prejudice the evaluation and decisions against the estuaries by underestimating benefits to the northern estuaries and come up with deep reservoir that will likely be deemed to have insufficient benefits to outweigh the costs.

We have serious concerns over the limited scope of calculating ecosystem benefits as the project advances. At the October 31, 2017 meeting, staff shared that while they embrace increasing southern flows to the Greater Everglades as a project objective, time constraints may prevent staff from fully analyzing flows to Florida Bay and Everglades National Park. Leaving these ecosystem benefits out of calculated benefits would be a disservice to the project, the Everglades, and the Florida Keys.

The District adopted CEPP as its guiding principle in developing the modeling for the EAA Storage Reservoir project, which seems appropriate as the EAA Reservoir is intended to be authorized as a Post Authorization Change Report to CEPP. However, in order to stay consistent with CEPP, reservoir planning should incorporate and adopt the CEPP purpose and need, which is: "to improve the quantity, quality, timing, and distribution of water flows to the Northern Estuaries, central Everglades (Water Conservation Area 3 [WCA 3] and Everglades National Park [ENP], and Florida Bay while increasing water supply for municipal and agricultural users". (CEPP PIR, pg. ES-1). As such, we strongly urge the District to ensure that ecological benefits to Everglades National Park and Florida Bay are included in ongoing EAA Reservoir analysis.

Process and NEPA Compliance

Among the constraints presented at public meetings is the need for compliance with the National Environmental Policy Act (NEPA). We agree that compliance with all requirements of NEPA, as well as other applicable federal laws, is critical for this planning process. Section 203 of the Water Resources Development Act (WRDA) of 1986, under which this project is being developed, requires the Secretary of the Army, prior to recommending the project for approval, to determine if the study, and the process under which the study was developed, comply with all Federal laws and regulations applicable to feasibility studies of water resources development projects. To accomplish this objective, we urge the District to work in close partnership and consultation with the U.S. Army Corps of Engineers to identify, outline, and make publicly available all federal compliance requirements to ensure that they are met in a timely manner.

We urge the District to provide meaningful and accessible NEPA-compliant public participation to those that stand to benefit the most, as well as be impacted, by this project. While it has been appropriate to schedule some of these meetings in West Palm Beach and Clewiston, the District must also provide just and equitable public participation opportunities within other parts of the project study area, in particular Miami-Dade/ Monroe region which faces longer traffic-congested commutes. Since one of the objectives of this project is to benefit the southernmost region of the Everglades ecosystem, residents and other stakeholders in that area should be given equitable opportunity for public engagement. That kind of engagement is not possible via web-casted meetings or via the structure of District governing board meetings.

We ask for the District to provide information on how the planning process is identifying and addressing environmental justice concerns per NEPA requirements and guidance.

Priorities and Assurances

As EAA Reservoir planning advances, Sierra Club wants to ensure that the project provides maximum benefits throughout the Everglades ecosystem with particular emphasis on the following issues:

- **Water Quality**

Meeting state and federal water quality standards is paramount for this and all other CERP projects. The District must make public the results of District modeling so that stakeholders are able to analyze and understand how the project configuration alternatives will maximize storage and conveyance south while meeting water quality standards to ensure that clean water is delivered to the Southern Everglades and Florida Bay.

- **Water for the Natural System**

Per legislative guidelines set forth in SB10, and in compliance with CERP goals, we understand the reservoir will achieve at least 240,000 acre feet of water storage. It is paramount that this amount of water is the *minimum* amount dedicated for the natural system. This volume of water, and more, is needed for Everglades National Park and Florida Bay. Accordingly, alternatives that provide greater quantities of water storage with the necessary water quality treatment should also be evaluated.

- **Maintain Progress**

Both state and federal agencies have committed to keeping the Central Everglades Project on track, particularly PPA South components that will bring direct benefits to Everglades National Park. Maintaining forward momentum on CEP, additional bridging of Tamiami Trail, construction completion and operation of ModWaters, C-111 South Dade, and C-111 Spreader Canal, are all critical to achieve the ecosystem benefits envisioned by the Florida Legislature in SB10.

- **Assessment of Needed Land**

As alternative development and modeling move forward, the critically important issue of the acreage required to achieve all project goals needs to be resolved. We ask the District to not limit its evaluation of alternatives to lands currently in state ownership, but instead to focus its evaluation on alternatives that provide the greatest environmental benefits and to move quickly to identify how much additional land will be needed to develop cost effective project alternatives that achieve the storage, conveyance and water quality goals outlined by the Florida Legislature and CERP.

We ask the District to run modeling for the EAA Reservoir that takes into account ALL state-owned land within the EAA that may be used for land swaps, as well as additional lands that may need to be purchased from willing sellers to meet all project objectives in a cost-effective manner.

Based on the initial modeling provided by the District, we believe that the District has failed to include enough land to construct a reservoir that would provide meaningful benefits to the estuaries as well as provide meaningful conveyance and treatment of water through the EAA and into the Everglades. Instead, the District has proposed to only model reservoir alternatives on the existing footprints of parcels A-1, A-2 and lands just west of A-2. As a result, the proposed reservoir alternatives are much deeper than originally envisioned by CERP, provide less effective STAs, are likely cost-prohibitive, and offer less ecological benefits.

- **Conveyance Capacity**

The EAA Reservoir Project requires conveyance improvements from Lake Okeechobee to the site of the reservoir. To maximize effectiveness and benefits, we recommend the District evaluate cost-effective alternatives that increase canal conveyance capacity to achieve the highest possible reduction in high-volume discharges, as well as increase the amount of freshwater that can be treated and sent south. This should include alternatives that not only smooth existing canal profiles, but also expand them beyond their current footprints.

A common excuse for not sending more Lake Okeechobee water south is insufficient outlet capacity and canal conveyance capacity. To address these limitations, the following features should be evaluated in order to allow for greater capacity and maximize the benefits of the EAA Reservoir project:

- New outlet(s) from Lake Okeechobee to increase the outlet capacity to the south, which would also help reduce the risk of Herbert Hoover Dike (HHD) failure.
- New canal(s) to send Lake Okeechobee water to the EAA reservoir, including during periods of high water in the EAA.
- Hydraulic connection to the western basin, the C-139 Basin in Hendry County, since STA-5/6 often dries out and has excess water treatment capacity, and the west side of WCA-3A often needs more water.

- **Reservoir Water Depth**

We question the cost feasibility, safety and ecological benefits of constructing the deeper reservoir options proposed by the District. One of the options calls for a reservoir that would hold at least 24 feet of water, an amount that is significantly higher than ever envisioned by CERP.

The reservoir dimensions proposed would need very high and wide berms. The design of the reservoir must be cost-effective for federal approval and configurations deeper than 12 feet might not be efficient enough to qualify.

We ask the District to take advantage of the work that led to the 2006 Revised Draft Integrated Project Implementation Report (PIR) and Environmental Impact Statement (EIS) for the Everglades Agricultural Area (EAA) Storage Reservoirs project, which had recommended a 12-ft reservoir providing 360,000 ac-ft of water storage.
http://141.232.10.32/pm/projects/proj_08_eaa_phase_1.aspx

- **Presentation of Results for Wetter Years**

We ask the District to be more forthcoming and clearly present modeling results for wetter years, which are the years when high-volume discharges to northern estuaries are more likely. Instead, as we understand it, the data presented at public meetings includes graphs with only average monthly flows within the model period of record, when the project might send 300,000 acre-feet per year to the south, mainly during dry season. Evaluating project alternatives based on average conditions will underestimate project benefits.

Other Comments and Questions

- We ask for clarification on the specific uses of land outside of effective acreage for storage and treatment.

- The District should not terminate the US Sugar Option Agreement mentioned in SB 10 until all lands needed for this project are acquired.

- Has soil subsidence issues within the EAA been factored into project alternatives?

- We ask for clarification on how applicable federal and state water quality standards were factored into the DMSTA modeling to determine compliance with the strictest applicable standards. The readme.txt file provided by the District with the DMSTA screening results dated November 7, 2017 states the evaluation was performed to achieve 13 ppb or less, of presumably phosphorus. Why 13 ppb and not 10 ppb?

- The District should put on hold the bidding and sale of the larger tracts on the District's land surplus database in order to maximize opportunities for willing land owners to swap lands that could be used for the EAA Reservoir project. When the District conducted its comprehensive land assessment in 2013, the analysis, and hence its recommendations, did not include opportunities to use some of those District lands for purposes of land swaps to benefit the future EAA reservoir project envisioned by CERP.

Thanks for the opportunity to provide these comments and questions. We look forward to staying engaged throughout this important project.

Sincerely,

Diana Umpierre
Organizing Representative, Sierra Club

cc: Lt. Col. Jennifer A. Reynolds, USACE Jacksonville District
FL Senator Joe Negron

SIERRA CLUB

February 9, 2018

Director Ernie Marks
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33406

Dear Mr. Marks:

The SFWMD presentation to the Governing Board on February 8, 2018 has prompted a number of questions for which we would greatly appreciate answers, preferably in writing/ email. Our full understanding of the District's position depends on receiving responses to these and perhaps subsequent questions. For now, the questions are the following:

1. What was meant by the statement that the Tentative Selected Plan (TSP) delivers only "near-shore benefits to Florida Bay"? Can you be more specific on where within the Florida Bay will these benefits be delivered and what they will be?

2. A presentation slide stated the TSP delivers ~ 370 kac-ft of new water flows (average annual), but the SFWMD press release says ~300 kac-ft. What is the actual approximate number based on the model outputs? Please specify the graphs/charts when responding.

3. What was meant by the statement that the TSP "approaches" CERP goals for reducing damaging discharges; what exactly does "approaches" mean quantitatively?

4. Will the TSP deliver the CERP goal for clean water conveyed south to Everglades National Park and Florida Bay? What is that CERP goal and where it is documented? We made a similar request on or about December 8, 2017 and received a response from the District that there were no responsive records.

5. What are the CERP goals for the 3 performance measures related to discharges to the northern estuaries mentioned in the presentation?
    a. % reduction of high-discharge events lasting more than 60 days
    b. % reduction of discharge volumes
    c. % reduction of Lake O events that exceed preferred salinity

6. For the percentages related to reducing damaging discharges, how much of those percentages are benefits from CEP vs from CEP+EAA Storage Reservoir? What is the percentage of reductions above what CEP was already scheduled to achieve?

7. C240A was categorized as "multi-purpose" to add extra benefits for the same cost. What was meant by "a multi-purpose reservoir"? Is water supply for agriculture included in this TSP? If yes, how much? In the "Next Steps" slide, can you elaborate on what was meant by "identify water protected for the natural system"?

8. What is the "company" hired by SFWMD to give "independent" feedback? What are the names, titles, affiliations, and credentials for the mentioned "5 to 6 experts"?

9. How is the District communicating with the Miccosukee Tribe and the Seminole Tribe in regards to this specific project, the EAA storage reservoir?

10. Regarding reports, final reports and comment periods:
    a. What will the Governing Board be voting upon on March 8, 2018? Will the Governing Board have seen something other than what was presented on Feb. 8 before that vote? If so, when will public see what the Governing Board will vote upon?
    b. SFWMD staff stated that the "draft" plan will be shared with government agencies and entities (fed/state/local). What are the opportunities for these agencies to respond to/comment on the draft report/ plan? What are the opportunities for other stakeholders and the general public to respond to/comment on the report?
        i. Did the failure to produce and/or make public a draft report on January 30 impact any comment period?
        ii. Upon which date does (or did) the state agency review begin? What is the comment period for stakeholders and the general public?
        iii. Upon which date will the NEPA comment period begin?

11. Has the SFWMD rejected the use of Deep Injection Wells as part of its plan to reduce Lake Okeechobee discharges to the northern estuaries? If not, what are your plans to use deep injection wells?

Thank you in advance for your prompt attention to this matter.

Sincerely,

Diana Umpierre, AICP
Organizing Representative
Everglades Restoration Campaign
Sierra Club

cc: Matt Morrison
Mike Albert

Questions Submitted by Sierra Club via email to SFWMD staff

Submitted Feb 9, 2018 – No response received

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       i. Did the failure to produce and/or make public a draft report on January 30 impact any comment period?
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       iii. Upon which date will the NEPA comment period begin?

11. Has the SFWMD rejected the use of Deep Injection Wells as part of its plan to reduce Lake Okeechobee discharges to the northern estuaries? If not, what are your plans to use deep injection wells?

Submitted Feb 22, 2018 – No response received

On Nov 22, 2017, by a deadline provided by SFWMD for written scoping comments for the EAA storage reservoir, Sierra Club submitted comments via email. Attached/ Below is the email and letter. I am re-forwarding this information because the District has not yet acknowledged receipt. We want to make sure that our comment letter was received and it will be included in the draft CEPP PACR/ FS/ EIS that agencies will be reviewing, including District responses to our questions.

We are concerned that our letter has not been taken into account. This is because on December 8, 2017, we submitted a public records request that asked for "copies of all stakeholder public comments that the SFWMD has received from May 1, 2017 to December 8, 2017, including electronic mail, in-person submissions, and regular mail, regarding the proposed EAA Reservoir pursuant to Chapter 2017-10 of Laws of FL (SB10).".

What we received seemed limited and it did NOT include our own letter submitted to the District on Nov 22. Hopefully, our letter was the only public comment omitted from our request.

PLEASE, CAN YOU CONFIRM THAT OUR LETTER HAS BEEN INCLUDED IN THE DRAFT CEPP PACR/ FS & EIS THAT WILL BE SENT TO THE GOVT AGENCY TECHNICAL REVIEW THAT WILL BE CONDUCTED?

Submitted Feb 26, 2018 – No response received

In addition to the attached questions sent on Feb 9, we have the following additional questions:

>> It was mentioned that District staff will seek GB authorization to submit the Post Authorization Change Report (PACR) to ASA. What specificically will the GB be "authorizing" in their March GB mtg? Will you be sharing with GB members a draft copy of the PACR report, including its appendices/ annexes before their March mtg? If no, what will you be providing so they make an informed decision outside of information on Powerpoint slides?

>> Which specific agencies (federal, state, local and tribal) were invited to the mtg/ teleconference call that was held to kick off the Agency Technical Review meeting? When was this meeting or teleconference kickoff held? How many weeks and/or days did SFWMD give to these agencies to provide comments and in what format?

>> Are the model run output files used to calculate the quantitative benefits of the proposed C240 alternative that were presented at the NAS committee meeting last week on your FTP public site? I looked but only saw the files from an earlier run, posted on Jan 30, 2018. Among others, I'm trying to ascertain if these are model run files that provide the backup data for the estimated increase of flows of approximately 370,000 ac-ft (average annual).

From: Donald Minor
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Lake Ockeeb
Date: Wednesday, April 25, 2018 9:12:35 AM

Hope youse all vote to let ponds to catch water discharges from lake start. It would be nice to have this as first step in many need to keep fowl water out of St Lucie River waters and let area recover from prolong harmful discharges. Looking foward to return to natural flow to Everglades. thanks Don Minor Stuart fl.

From: Mitsch, William
To: abe@slought.org
Cc: Auvenshine, Stacie J CIV USARMY CESAJ (US); Rae Ann Wessel; Jennifer Rubiello; pat@slought.org
Subject: [Non-DoD Source] Re: EAA Reservoir
Date: Tuesday, April 24, 2018 10:31:16 AM

Abe and Pat,
I am less enthusiastic because water quality plan is inadequate and swept under rug just to encumber $2 billion. I am writing piece now for ACOE request on behalf of Friends of Everglades. Might be able to show you draft by Friday. When do you comment? Can u wait till then?
Bill

Sent from my iPhone

On Apr 24, 2018, at 10:24 AM, Abe Levy <abe@slought.org <mailto:abe@slought.org> > wrote:

I am writing to support strongly the construction of the EAA reservoir.

While I would prefer a much larger and shallower wetland, rather than an over 20-feet deep reservoir, I am grateful for this very modest step in the right direction of moving water southward from Lake Okeechobee into an EAA and from there southward into the Everglades.

Thank you for anything you can do to expedite the construction of this reservoir.

Abe Levy

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abe@slought.org <mailto:abe@slought.org>

914-924-1260

Restoring the Florida Everglades: Comments on the EAA Reservoir Plan

by

William J. Mitsch, Ph.D.
Consultant, Friends of the Everglades
Director--Everglades Wetland Research Park,
Eminent Scholar--College of Art & Sciences, and
Juliet C Sproul Chair for Southwest Florida Habitat Restoration,
Florida Gulf Coast University
Chair, U.S. National Ramsar Committee
Founder and Editor-in-Chief, Ecological Engineering 1992-2017
Professor Emeritus of Environmental Science, The Ohio State University
Courtesy Professor of Soil and Water Science, University of Florida
Courtesy Professor, School of Geosciences, University of South Florida

Pertinent Bio

My lab at FGCU, referred to as the "Everglades Wetland Research Park" has published recently and frequently about modeling, monitoring, and experimenting with water quality improvement in the sawgrass "river of grass" eastern half of the Greater Florida Everglades (Mitsch, 2016; Mitsch et al., 2015, 2018; Marios et al., 2015a,b; Yeoman et al., 2017). In addition, over the past 25 years I presented wetland modeling short courses at SFWMD and served on several SFWMD review committees, including serving as chair of a panel reviewing the Everglades Land Model (ELM) in 2006. Over the past 30 years, my lab has published many versions of models specific to wetlands and nutrient retention, particularly related to phosphorus (Mitsch et al., 1982, 1988; Mitsch and Fennessy,1991; Mitsch and Reeder, 1991; Christensen et al., 1994; Wang and Mitsch, 2000; Jørgensen et al., 2005; Zhang and Mitsch, 2005; Marois and Mitsch, 2015a).

Introduction

I believe that the Florida Everglades restoration is now at a crucial crossroad that will determine its long-term success or failure so I consider it prudent to make some comments on the EAA Reservoir Plan as it is currently described. We were unable to delve into the details of hydrologic modeling performed by the SFWMD related to this project given the short time allowed for comments and lack of support for a rigorous modeling effort, but I am providing this hopefully constructive critique so that the U.S. Army Corps of Engineers and the South Florida Water Management District can fine-tune the "EAA Reservoir" plan so that it becomes a significant step forward toward completion of a sustainable Florida Everglades restoration.

I first express my support for seeing an ambitious effort for eliminating decades of stalling with a serious “sending the water south” strategy, the mantra for a generation of those who understand the big picture of what the Florida Everglades restoration is all about. The South Florida Water Management District claims the EAA Reservoir project will — when used in conjunction with other existing and planned projects — reduce the number of damaging discharge events from Lake Okeechobee to the St. Lucie and Caloosahatchee rivers by 63 percent and increase the flow going south by 76% by 160,000 acre-ft/year to 370,000 acre-ft/year (121 billion gallons per year) of water south to the Everglades and Florida Bay from Lake Okeechobee.

But if this plan results in pollutants, particularly phosphorus and nitrogen, getting into greater Everglades (WCAs and south) or develops an unsustainable, un-ecological and/or simply polluted reservoir to manage in perpetuity, we will regret the day we said OK “just to spend the money.” I am not assured from what I see written so far from SFWMD that this project is properly focused on what is important—sending clean water to the greater Florida Everglades. If ever there was a need for an ecological engineering and not just civil engineering approaches to lead the Everglades restoration, this is it.

The Plan

A current plan, referred to as C240A (Smith, 2018), calls for sending Lake Okeechobee water to a “EAA Reservoir” to be constructed 30 or so miles south of Lake Okeechobee with the following design: 23-foot-deep, 10,100-acres, with the ability to store up to 240,000 acre-ft (78.2 billion gallons) of excess Lake Okeechobee water. The plan also involves completion of a previously approved 15,000–acre A-1 Flow Equalization Basin with a maximum water storage 60,000 acre-feet (20 billion gallons). The plan also includes the design and operation of 6,500 acres of shallow treatment wetlands (sometimes referred to by the SFWMD as Stormwater Treatment Areas (STAs), similar to the 57,045 acres (23,085 ha) of STAs already constructed to clean the water prior to its discharge to the Everglades to the south.

Concerns

1. My first comment concerns the false expectations by the public so that they approve expenditures of up to $2 billion. I have frequently heard “well the project is not perfect, but let’s do it while the money is there.” The volume of water being discharged south needs to be put in perspective; the 121 billion gallons/year of water eventually being sent south to the Everglades and Florida Bay in the EAA reservoir plan will not solve the estuarine pollution of the Gulf of Mexico and Atlantic Ocean coastlines. Figure 1 illustrates the Everglades Restoration plan that I have had in my textbooks since we published it in the Mitsch and Jørgensen (2004) ecological engineering book 14 years ago and continued to be published in the 4th and 5th editions of “Wetlands” (Mitsch and Gosselink, 2007, 2015). I am aware that the restoration plan shown in the 3rd panel has been

changed in several more recent publications and in prominent locations including the well-known wall maps at Corkscrew Swamp Sanctuary lobby that now show significant water flowing east and west flow to the coastal estuaries, even when the restoration is complete. It is not clear that the public is aware that this subtle change in graphics represents a major change in the overall restoration goals in the past decade.

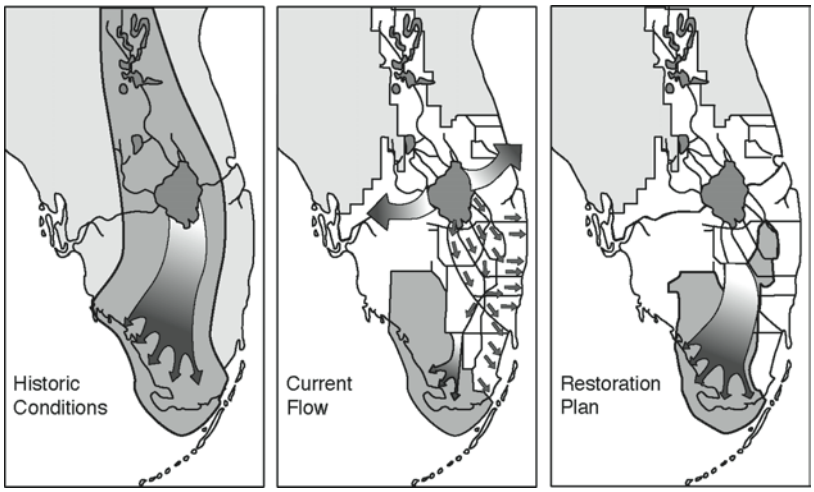

Figure 1. Three-picture summary of historic, current, and restoration water flow in the Florida Everglades as provided by the U.S. Army Corps of Engineers in the early 2000s. (from Mitsch and Jørgensen, 2004)

To put 121 billion gallons of water per year in perspective, 3.1 billion cubic meters or 819 billion gallons) were discharged to the St. Lucie and Caloosahatchee rivers in the El Nino flooding year of 2016 (Table 1), 6.7 times the flow expected to go south with the EAA Reservoir plan. Even in the last 10 years (2008-2017) an average of 1.5 billion cubic meters per year or 396 billion gallons (Table 1) is 3.3 times 121 billion gallons per year of water that will be sent south according to the plan.

Table 1. Freshwater discharges from Lake Okeechobee to the sea over the period 2008-2017, and annually in 2013, 2016, and 2017.

Discharge from Lake Okeechobee	2008-2017	2013	2016	2017
Discharge to Caloosahatachee and Gulf of Mexico ($x10^9$ m^3)	1.3	1.6	2.2	1.7
Discharge to St. Lucie and Atlantic Ocean ($x10^9$ m^3)	0.2	0.6	0.9	0.6
TOTAL Discharge to the sea ($x10^9$ m^3)	1.5	2.2	3.1	2.3
Equivalent depth of Lake O discharged to sea (m)	0.8	1.1	1.6	1.2

Discharge data from:
USGS 02292010 CALOOSAHATCHEE CANAL DWS OF S-77 AT MOORE HAVEN FL
USGS 02276877 ST. LUCIE CANAL BLW S-308

2. There is insufficient detail on water quality in the plan relative to water volume and flow. The flow south to the Everglades will increase by 76% from 210,000 acre-ft/yr (68 billion gallon/yr) to 370,000 acre-ft/yr (121 gallon/yr) according to the most recent approved version of the EAA Reservoir plan (Smith, 2018). Despite the 76% increase in flow, the project shows an increase in treatment wetlands of only 11% (6,500 acres) to designed to improve water quality directly. I estimate a minimum of at least 43,000 additional acres of treatment wetlands (STAs or passive wetlands) will be needed to treat the water flowing south. Further, we note that the estimated average concentration of phosphorus flowing out of Lake Okeechobee is 147 ppb (Goforth, 2010) while the average inflow to the current STAs in about 100 ppb (SFWMD, 2016). Due to the higher flow, it is common sense that the phosphorus concentrations reaching current and future STAs will be higher than the concentrations reaching them now and, in that case, threaten existing state and federal standards on Everglades water quality.

3. The new EAA reservoir will not resemble any natural feature of aquatic ecosystems in the greater Florida Everglades in ecology, morphology or hydroperiod. The hydroperiods will be wrong and exaggerated for south Florida ecology (similar to the way wetland hydroperiods were shifted in the Great Lakes with diked marsh hunt clubs and conservation areas, Mitsch et al., 2001; Mitsch and Gosselink 2015). The potential amplitude of the annual hydroperiods of up to 23 feet in the EAA reservoir is exceeded only rarely in natural or human-created ecosystems, e.g. the Amazon River (Junk et al., 1992) or Three Gorges Dam reservoir (Mitsch et al., 2008). The reservoir may become a “freak ecosystem” over time, i.e., an aquatic ecosystem dissimilar in hydrology and probably ecology to any other aquatic ecosystem in Florida.

4. Most eutrophic lakes in our experience become occasional or even permanent sources rather than sinks of nutrients—Buckeye Lake, Ohio (W.J. Mitsch, personal experience), Taihiu Lake in China (Kelderman et al., 2005), and even Lake Okeechobee (Havens and James, 2005). It is highly probable that the EAA reservoir will not be a nutrient sink in most years, an assumption that is included in this plan. Using a Vollenweider-type model (Hejzlar et al., 2006) in SFWMD’s DMSTA model as proof that the EAA reservoir will always be a nutrient sink is ecologically and hydrologically inaccurate and misleading. The DMSTA model was developed to evaluate multiple STA design alternatives. Model simplicity resulted from aggregation of key variables and processes controlling phosphorus storage and cycling (Walker and Kadlec, 2011). But the DMSTA has not been calibrated for reservoirs. Also, the model can be used on a daily inflow step and the empirically derived coefficients are based on long-term annual average values.

Conclusions

- The EAA Reservoir is considered the heart of this recent attempt to send water south in the Florida Everglades and is a good start of the discussion of solving water excess and scarcity problems. The Florida State Legislature and the South Florida Water Management District plan to increase the southerly flow by 63 percent and send an average of 121 billion gallons of water south to the Everglades and Florida Bay is noteworthy.

- Nevertheless, there is considerable ambiguity in the plan and its model predictions about the quality of the water as it enters the greater Everglades south of the EAA Reservoir and through Miccosukee Tribal lands on its way to the Everglades National Park and Florida Bay. At a minimum, ~50,000 acres of treatment wetlands (STAs) need to be created or restored in proximity to the EAA Reservoir; 6,500 acres of shallow treatment wetlands will be insufficient to protect the Everglades.

- The plan for an EAA reservoir immediately south of Lake Okeechobee needs to be re-examined. For example, purchase of farmland at a fair price coupled with conversion of that land to treatment wetlands (perhaps as many as 150,000 acres from the 700,000 acre EAA) in lieu of construction of a ~$2-billion EAA reservoir is a reasonable alternative to the reservoir for water storage and water quality and should be examined. Additionally, state-owned lands currently leased to agricultural tenants could be incorporated in any comprehensive review of alternatives. Adequate wetland creation to achieve water quality in the Florida Everglades is true “restoration”; creation of large difficult to manage deep reservoirs is not. If a deep reservoir in Florida’s subtropical climate compounds costs and problems for existing Everglades restoration plans, Corps acceptance of this plan should be conditioned by adequate stormwater treatment areas, i.e., treatment wetlands (STA’s) and flow equalization basins (FEB’s) to mitigate the chances of falling short.

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Jacksonville District, US Army Corps of Engineers (USACE)
and South Florida Water Management District (SFWMD)
Environmental Impact Statement (EIS)
For a Central Everglades Planning Project Post Authorization Change
Report for the Everglades Agricultural Area Reservoir, Florida
US Environmental Protection Agency (EPA)
Scoping Comments
April 30, 2018

Background: The EPA understands the purpose of the proposed project is to make improvements to the Central Everglades Planning Project (CEPP) components related to Flow Equalization Basins (FEBs), associated Stormwater Treatment Areas (STAs), and canal conveyance systems that will increase the storage capacity to relieve high water elevations within Lake Okeechobee. The South Florida Water Management District's (SFWMD) stated project goal is to reduce high water elevations within Lake Okeechobee that would then lead to fewer harmful discharge events to the St. Lucie Estuary and Caloosahatchee Estuary, while also increasing flows into the central Everglades[1]. The EPA staff have participated in numerous SFWMD public meetings, conference calls, and webinars regarding this EIS and feasibility study. The SFWMD requested the EPA and other Federal and State resource agencies provide scoping comments as they prepared the Draft EIS. On November 21, 2017, the EPA provided the SFWMD with scoping comments[2] regarding this EIS and feasibility study. The EPA notes that the SFWMD has prepared a Draft EIS (DEIS) and feasibility study pursuant to section 203 of Water Resources Development Act (WRDA) 1986 (Section 203), as amended. In accordance with Section 203, on March 30, 2018 the SFWMD submitted the DEIS and feasibility study to the Assistant Secretary of the Army for Civil Works for review for the purpose of determining whether the study, and the process under which the study was developed, comply with Federal laws and regulations applicable to feasibility studies of water resources development projects. On April 16, 2018, the USACE released a Notice of Intent (NOI)[3] to prepare a DEIS or a CEPP Post Authorization Change Report (CEPP PACR) for the Everglades Agricultural Area (EAA) Reservoir. Pursuant to this NOI, it is the EPA's understanding that the USACE has reinitiated scoping to collect comments from agencies and stakeholders. As of this date, the EPA has not thoroughly reviewed the SFWMD's DEIS and feasibility study and our scoping comments (listed below) reflect our current knowledge of the DEIS and feasibility study.

Water Quality Effluent Based Limit (WQBEL): As noted in the EPA's November 21, 2017, scoping comments, the EPA continues to recommend that the USACE and SFWMD carefully consider the Total Phosphorous (TP) Water Quality Effluent Based Limit (WQBEL) when

[1] South Florida Management District, "Draft Feasibility Study and Environmental Impact Statement Central Everglades Planning Project Post Authorization Change Report", February 2018.
[2] Higgins, Jamie. "EAA Storage Reservoirs EIS." Received by EAAreservoirs@sfwmd.gov, 21 Nov. 2017.
[3] Federal Register Volume 83, Number 73, *Notice of Intent To Prepare a Draft Environmental Impact Statement for a Central Everglades Planning Project Post Authorization Change Report for the Everglades Agricultural Areal Reservoir,* April 16, 2018, pages 16346-16347.

considering various alternatives for the A-2 parcel. In accordance with Sections 373.026(8)(b) and 373.1501(9), Florida Statue, the Florida Department of Environmental Protection (FDEP) prepared a Secretarial Order[4], which approved the proposed project. Regarding the WQBEL, the FDEP states,

> *"The modeling contains various conservative assumptions and practices to provide certainty that the applicable WQBEL will be achieved by the project. Although all modeling and associated assumptions have some level of uncertainty, permitting requirements applicable to the STAs ensure the WQBEL will ultimately be achieved. In the event the WQBEL is not attained, additional actions to meet water quality requirements must be undertaken. For example, the District could convert portions of the A-1 Flow Equalization Basin to a STA."* (page 5)

The EPA acknowledges and supports FDEP's commitment to attaining the WQBEL.

Restoration Strategies Regional Water Quality Plan[5]: In response to an order by the United States District Court, Southern District of Florida, EPA, SFWMD and FDEP began technical discussions in 2010 to identify remedies to achieve Florida's 10 part per billion (ppb) water quality standard for TP in the Everglades Protection Area. The primary objectives were to establish the WQBEL that would ensure that discharges from the STAs do not cause or contribute to exceedances of the 10 ppb TP criterion, and to identify a suite of additional water quality projects that would contribute to reducing TP concentrations in discharges from the STAs to meet the WQBEL. Based on this collaborative effort, a suite of projects was identified that would achieve the WQBEL: the Restoration Strategies (RS) Regional Water Quality Plan[5]. The projects are divided into three flow paths (Eastern, Central, and Western), and primarily consist of FEBs, STA expansions, and associated infrastructure and conveyance improvements. The Central Flow Path contains STA 2, STA 3/4, and the CEPP EAA A-1 Storage Reservoir, which was completed as a shallow FEB in 2015 as a requirement of RS. Each flowpath has a separate construction schedule and the Central Flowpath projects were completed in 2015. The EPA is available to provide technical assistance to USACE and the SFWMD regarding the WQBEL and other water quality issues related to the proposed project.

Tribal Consultation: As noted in our November 21, 2017, scoping comments, the EPA encouraged the SFWMD to engage in meaningful discussions with the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida regarding the project. Because the SFWMD is not a federal entity, we acknowledge that the SFWMD could not conduct "government-to-government consultations" with the Tribes as that term applies to federal agencies under Executive Order No. 13175, "Consultation and Coordination with Indian Tribal Governments"

[4] Valenstein, Noah. Florida Department of Environmental Protection, OGC No. 18-0138, *Final Order Approving the Central Everglades Planning Project Post-Authorization Change Report Everglades Agricultural Area Reservoir.* Mar. 5, 2018.
[5] South Florida Water Management District, *Restoration Strategies Regional Water Quality Plan,* Apr. 27, 2012.

(Nov. 6, 2000). The EPA notes that, in a recent January 8, 2018, letter[1] to the SFWMD, the Miccosukee Tribe of Indians of Florida outlined many concerns regarding the proposed EAA Reservoir. The EPA encourages both the USACE, as the government agency charged with tribal consultation under E.O. 13175, to conduct tribal consultation as it deems appropriate, and the SFWMD to continue its outreach efforts to the Tribes in conjunction with the Project. The EPA also notes that the EPA works closely with both Tribes on Everglades matters and is committed to working with state and federal partners with regard to the Tribes' water quality and water management concerns.

Environmental Justice (EJ): The EPA notes that the current tentatively selected plan is entirely on state lands and does not take any agricultural lands out of production. Should changes to the tentatively selected plan require the conversion of agricultural lands to a component of the project, then the EPA recommends the USACE and SFWMD evaluate impacts to low income, minority farmers, and farm workers.

[1] Cypress, Billy. Letter to Ernie Marks, Executive Director, SFWMD *RE: Discrimination in Water Management Decisions/EAA Reservoir Chapter 2017-10*. Jan 8, 2018.

From: Ed Fielding
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc: Ernie Marks (emarks@sfwmd.gov)
Subject: [Non-DoD Source] reservoir
Date: Monday, April 30, 2018 5:03:11 PM

Members of my family were school teachers in Moore Haven area during 1926 hurricane. I have had a lifetime observing the various projects of the Army Corps and so have skeptical hope as we fling out on a new mission of salvation for the Everglades. Often we do a lot of stuff (spend money) with only modest resultant benefit for the patient.

We may do no better this time, but I hope we at least catalog our objectives, establishing metric to determine how we are doing and even which way we are going.

A. OBJECTIVES
1. for Lake, the list to accomplish restoration would be overwhelming, but the modest list for water control as affecting the estuaries and releasing water SOUTH may be within the range of
being doable.
a. Unfortunately the most effective way to address Lake levels, through significant increase of storage in the upper Okeechobee basin, has been thwarted in the LOW Project Plan.
b. If our objective were to eliminate estuary discharge rather than just make unfounded and totally unsupportable claims about percentage improvement in decreased volume of releases
there would be more hope. So should we get a Harvey instead of an Irma it is just a freak of nature; no lack of planning here.
c. To eliminate releases to the St. Lucie estuary we need sufficient capacity to discharge to the South, clean water to meet quality standards and conveyance to move the water into areas
of need and storage areas, reservoir(s), and procedures and policies to move Lake water before EAA drainage fills all the available canals.
2. To release water SOUTH:
a. Conveyance,
b. Sufficient water quality,
c. Movement ahead of EAA drainage.
3. Accumulate in the reservoir via some cleaning process.
4. This additional water to be available for: Park, Tribes, Florida Bay, Key Biscayne, Shark River Slough, etc (i.e. the environment).

B. MEASURE ACHIEVEMENT OF OBJECTIVES

C. PROBLEMS
1. Reliance on outdated weather model; Harvey would have breached the dike, yet we still plan on Irma being the unique storm event;
2. With heavy rain fall still rely on releases to estuary as only outlets with sufficient capacity and lack of water quality standards.
3. EAA releases plug up pathway to getting Lake water releases into reservoir.
4. How to get clean water into reservoir?
5. How to get clean water to Park, Florida Bay, etc?
6. Establish a measuring system so we know when we are and are not meeting expectations at various points along the projected flow pathway.
7. We are not planning sufficiently for water retention in Okeechobee basin nor in chain of Lakes.

Ed Fielding

Commissioner – District 2
Martin County Board of County Commissioners
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From: Florence Chatowsky
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] St Lucie River
Date: Tuesday, May 01, 2018 1:46:10 PM

Science and the St. Lucie

An estuary is defined as a body of water having a freshwater inflow at one end that mixes with saltwater providing a low salinity gradient (brackish water) that connects with the ocean at the other end and is subject to tidal flows. It is not a bay. It is not a river. The St. Lucie River is an estuary. It had fresh water running into it from its upper north and south forks, drainage creeks, and historically above and underground sheet flow water moving in from the west. The lower salinity water of an estuary is important as a nursery for fish such as mullet, redfish, mangrove snapper, snook; also for shrimp, oysters, blue crabs, and other inshore creatures.

When I moved to our home on the St. Lucie estuary 26 years ago water was being released into it from Lake Okeechobee via the St. Lucie locks in low volume pulse releases. I could tell when the water was being released because the fishing improved especially the snook bite. Snook like to feed in moving water and would swim up to the inflowing water at the locks to feed on the mullet that also move into fresh water to feed on vegetation. At the C-23 canal in Palm City that runs into the St Lucie, the fishing is always better when fresh water is flowing over t he dam. There is even a fish pier built below the dam for that reason.

During the pulse releases of the early 1990's the fishing in the St. Lucie was very good. Every winter schools of bluefish, Spanish mackerel, and jacks would feed at channel marker 19 and off the Martin Memorial Hospital shore. The dark water did not bother the fish at all. In fact, most of the fish that inhabit the St. Lucie can live in fresh water. Mullet, snook, and tarpon have been caught in Lake O. Go to Homasassa Springs and see sheepshead, redfish, tarpon, jacks, mullet all thriving in the cold fresh spring water.

As long as the Lake O water was released in low to moderate volumes the fish did fine and there were enough available for both sports fishing and commercial netting. It was not until 1998 after the pulse releases were stopped, that a prolonged release of large volumes of freshwater became necessary and so stressed the estuary, that we began to see lesions on fish and oysters disappearing. When the high volume inflow diminished the lesions diminished and the oysters returned. There is a critical threshold of fresh water inflow from Lake O into the St. Lucie estuary above which its ecosystems are shocked. Is it possible to determine the critical threshold?

I have heard about restoring the original flow of Lake O water south through the Everglades since my first trip to Florida in 1957 to camp in and explore the Everglades National Park. In the meantime the overflow from the lake is now dumped into the St Lucie without a management plan except to release it in large volumes dictated by rain. Are there scientists with the South Florida Management and the U.S. Corps of Engineers, in other words the state and federal governments, knowledgeable about the dynamics of estuaries that with their computer models can design an outflow plan for Lake O water to be released into the St. Lucie in a low volume steady state that does not

exceed the critical threshold and allows the inflowing fresh water to blend with the salt water in a more natural manner? Is that possible?

No fresh water coming into the St. Lucie estuary can have a negative effect as demonstrated during the drought years. The water became clearer but highly saline. The fishing declined and the mullet, which enter the estuary from the ocean stopped coming into it. Finger mullet move up from the ocean into lower saline waters where they feed on aquatic vegetation, algae, and mangrove detritus. Hiding in the mangroves from predators they grow to adult size. Before the drought during the pulse releases the canals and creeks of the St. Lucie would fill up with mullet and you could hear the snook feeding in them all night. Since the drought that no longer happens and only remnants of the great mullet schools are found in the Sr. Lucie now. In fact it was the mullet, glass minnows, and juvenile menhaden that grew in the brackish water luring in the predator fish that made for such good fishing years ago.

In summary: the St. Lucie River is not being addressed as an estuary but as a place for large slugs of Lake O water to be dumped into in an all of none manner. Low volume pulse releases did not harm the fish or fishing, Large volumes of Lake O water in prolonged releases does harm the fish and fishing and promotes algae inflows and algae blooms. Drought and no releases of fresh water over a prolonged period causes higher than normal salinities (salt water intrusion) that can have a negative effect on estuary fish populations.

While we wait for the southern flow from Lake O to be fully restored and proposed water storage areas to be developed can we do something for the St. Lucie estuary now? Will scientists and engineers working together design and implement a release system for Lake O water that provides a low volume flow of water to the St. Lucie in an effort to keep the lake at stable levels and maintain the health of the estuary instead of the current antiquated system of massive releases that shock the estuary and shock the community? Might it be accomplished at a fraction of the money allocated for Everglades Restoration? Can they do it? Is it possible?

Tony Chatowsky

B.S. in Ecology and Master of Marine Affairs

University of Rhode Island

Past MC Audubon Conservation Chair,

17 years doing annual Audubon Christmas Bird Count

on the north and south forks of the St. Lucie River

From: Frank Taube
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc: Laura Taube (missygirl40@comcast.net)
Subject: [Non-DoD Source] Lake O Discharges
Date: Friday, April 20, 2018 9:36:49 AM
Attachments: image001.gif
image002.png

Good morning Ms. Auvenshine.

My wife and I fully support the efforts of the Army Corps efforts to reduce the discharges from Lake Okeechobee and improve clean water flow to the everglades. We believe the people that work for the Corps have invested their life's work to improve the environment and human interaction with it to protect our planet. And your plan to build a retaining lake to settle and filter the water to direct it to where it is needed in the everglades is supported by my wife and me.

We have the opportunity to see the Atlantic just north of the St Lucie inlet and can see the vast improvement of the water quality with the reduced discharges in 2018. The ocean is blue again and the fish have begun to return. If we can reduce the number of discharges in a wet season the water quality will improve greatly. If we build this basin and give the water a place to go, it will return Florida to its natural state.

Thank you for your help in this project.

Frank Taube

1925 SE Sailfish Point Blvd

Stuart, Florida 34996

Ftaube3@sysspec.com <mailto:Ftaube3@sysspec.com>

Mobile 248-978-3005

From: Mrs. Ginger Goepper
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Protect our Florida environment from harmful pollutants.
Date: Monday, April 23, 2018 4:43:22 PM

Stacie Auvenshine,
I am writing to support the Army Corp of Engineers' efforts to protect Florida's environment from the harmful pollutants in Okeechobee Lake discharges:

* 23-foot-deep, 10,100-acre reservoir to store up to 78.2 billion gallons of excess lake water
* 6,500-acre man-made marsh to clean the water

When used in conjunction with other existing and planned projects, I believe this will reduce the number of damaging discharge events from Lake Okeechobee to the St. Lucie and Caloosahatchee rivers by 63 percent and send an average of about 120.6 billion gallons of clean water south to the Everglades and Florida Bay.
Respectfully,
Ginger Goepper
Florida Conservation Coalition Team member

From: Howard Snoweiss
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Curtailing discharges from Lake Okeechobee
Date: Wednesday, April 18, 2018 8:39:35 PM

Dear Ms. Auvenshine,
I am writing to express my support of the Army Corps purchasing the land that is required in order to move the water south. As a resident of Stuart, who lives along the St. Lucie inlet, my family and I can attest to the importance of this project. Please move ahead with the land purchase and encourage congress to approve the plan.
Sincerely,
Howard Snoweiss

Howard Snoweiss
2920 S.E. Dune Drive #130
Stuart Fl. 34996
cel 305 215-1220
Hm 772 334-7013
hsnoweiss@mac.com <mailto:hsnoweiss@mac.com>

From: VeroDiehls
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Lake O reservoir
Date: Wednesday, April 18, 2018 10:41:11 AM

This is a multi faceted problem, but the reservoir is at least one step in the right direction. I hope it can be done, along with so many other things need to save this amazing little corner of God's creation with it's fragile waterways. Thanks. Rev/Capt Andrew C. 'Jack' Diehl III, CCA member and Environmental chair for our Sunrise Rotary Club, Vero Beach.

From:	Higgins, Jamie
To:	Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc:	Higgins, Jamie; Militscher, Chris; Zapata, Cesar; Harper, Cecelia; Scheidt, Dan; Torres, Ramon; Armor, Suzanne; Johnson, Patrick; Mancusi-Ungaro, Philip
Subject:	[Non-DoD Source] CEPP Post Authorization Change Report EIS Scoping Comments
Date:	Monday, April 30, 2018 3:58:22 PM
Attachments:	EAA scoping comments-USACE Final.pdf

Stacie,

Please find attached EPA's scoping comments for the Central Everglades Planning Project Post Authorization Change Report EIS. Please let us know if you have questions.

Thanks,
Jamie

Jamie Higgins

National Environmental Policy Act (NEPA) Program Office

Resource Conservation Restoration Division

Region 4, Environmental Protection Agency

61 Forsyth Street, NW

Atlanta, GA 30303

404-562-9681

Jacksonville District, US Army Corps of Engineers (USACE)
and South Florida Water Management District (SFWMD)
Environmental Impact Statement (EIS)
For a Central Everglades Planning Project Post Authorization Change
Report for the Everglades Agricultural Area Reservoir, Florida
US Environmental Protection Agency (EPA)
Scoping Comments
April 30, 2018

Background: The EPA understands the purpose of the proposed project is to make improvements to the Central Everglades Planning Project (CEPP) components related to Flow Equalization Basins (FEBs), associated Stormwater Treatment Areas (STAs), and canal conveyance systems that will increase the storage capacity to relieve high water elevations within Lake Okeechobee. The South Florida Water Management District's (SFWMD) stated project goal is to reduce high water elevations within Lake Okeechobee that would then lead to fewer harmful discharge events to the St. Lucie Estuary and Caloosahatchee Estuary, while also increasing flows into the central Everglades[1]. The EPA staff have participated in numerous SFWMD public meetings, conference calls, and webinars regarding this EIS and feasibility study. The SFWMD requested the EPA and other Federal and State resource agencies provide scoping comments as they prepared the Draft EIS. On November 21, 2017, the EPA provided the SFWMD with scoping comments[2] regarding this EIS and feasibility study. The EPA notes that the SFWMD has prepared a Draft EIS (DEIS) and feasibility study pursuant to section 203 of Water Resources Development Act (WRDA) 1986 (Section 203), as amended. In accordance with Section 203, on March 30, 2018 the SFWMD submitted the DEIS and feasibility study to the Assistant Secretary of the Army for Civil Works for review for the purpose of determining whether the study, and the process under which the study was developed, comply with Federal laws and regulations applicable to feasibility studies of water resources development projects. On April 16, 2018, the USACE released a Notice of Intent (NOI)[3] to prepare a DEIS or a CEPP Post Authorization Change Report (CEPP PACR) for the Everglades Agricultural Area (EAA) Reservoir. Pursuant to this NOI, it is the EPA's understanding that the USACE has reinitiated scoping to collect comments from agencies and stakeholders. As of this date, the EPA has not thoroughly reviewed the SFWMD's DEIS and feasibility study and our scoping comments (listed below) reflect our current knowledge of the DEIS and feasibility study.

Water Quality Effluent Based Limit (WQBEL): As noted in the EPA's November 21, 2017, scoping comments, the EPA continues to recommend that the USACE and SFWMD carefully consider the Total Phosphorous (TP) Water Quality Effluent Based Limit (WQBEL) when

[1] South Florida Management District, "Draft Feasibility Study and Environmental Impact Statement Central Everglades Planning Project Post Authorization Change Report", February 2018.
[2] Higgins, Jamie. "EAA Storage Reservoirs EIS." Received by EAAreservoirs@sfwmd.gov, 21 Nov. 2017.
[3] Federal Register Volume 83, Number 73, *Notice of Intent To Prepare a Draft Environmental Impact Statement for a Central Everglades Planning Project Post Authorization Change Report for the Everglades Agricultural Areal Reservoir,* April 16, 2018, pages 16346-16347.

considering various alternatives for the A-2 parcel. In accordance with Sections 373.026(8)(b) and 373.1501(9), Florida Statue, the Florida Department of Environmental Protection (FDEP) prepared a Secretarial Order[4], which approved the proposed project. Regarding the WQBEL, the FDEP states,

> *"The modeling contains various conservative assumptions and practices to provide certainty that the applicable WQBEL will be achieved by the project. Although all modeling and associated assumptions have some level of uncertainty, permitting requirements applicable to the STAs ensure the WQBEL will ultimately be achieved. In the event the WQBEL is not attained, additional actions to meet water quality requirements must be undertaken. For example, the District could convert portions of the A-1 Flow Equalization Basin to a STA."* (page 5)

The EPA acknowledges and supports FDEP's commitment to attaining the WQBEL.

Restoration Strategies Regional Water Quality Plan[5]: In response to an order by the United States District Court, Southern District of Florida, EPA, SFWMD and FDEP began technical discussions in 2010 to identify remedies to achieve Florida's 10 part per billion (ppb) water quality standard for TP in the Everglades Protection Area. The primary objectives were to establish the WQBEL that would ensure that discharges from the STAs do not cause or contribute to exceedances of the 10 ppb TP criterion, and to identify a suite of additional water quality projects that would contribute to reducing TP concentrations in discharges from the STAs to meet the WQBEL. Based on this collaborative effort, a suite of projects was identified that would achieve the WQBEL: the Restoration Strategies (RS) Regional Water Quality Plan[5]. The projects are divided into three flow paths (Eastern, Central, and Western), and primarily consist of FEBs, STA expansions, and associated infrastructure and conveyance improvements. The Central Flow Path contains STA 2, STA 3/4, and the CEPP EAA A-1 Storage Reservoir, which was completed as a shallow FEB in 2015 as a requirement of RS. Each flowpath has a separate construction schedule and the Central Flowpath projects were completed in 2015. The EPA is available to provide technical assistance to USACE and the SFWMD regarding the WQBEL and other water quality issues related to the proposed project.

Tribal Consultation: As noted in our November 21, 2017, scoping comments, the EPA encouraged the SFWMD to engage in meaningful discussions with the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida regarding the project. Because the SFWMD is not a federal entity, we acknowledge that the SFWMD could not conduct "government-to-government consultations" with the Tribes as that term applies to federal agencies under Executive Order No. 13175, "Consultation and Coordination with Indian Tribal Governments"

[4] Valenstein, Noah. Florida Department of Environmental Protection, OGC No. 18-0138, *Final Order Approving the Central Everglades Planning Project Post-Authorization Change Report Everglades Agricultural Area Reservoir.* Mar. 5, 2018.
[5] South Florida Water Management District, *Restoration Strategies Regional Water Quality Plan,* Apr. 27, 2012.

(Nov. 6, 2000). The EPA notes that, in a recent January 8, 2018, letter[1] to the SFWMD, the Miccosukee Tribe of Indians of Florida outlined many concerns regarding the proposed EAA Reservoir. The EPA encourages both the USACE, as the government agency charged with tribal consultation under E.O. 13175, to conduct tribal consultation as it deems appropriate, and the SFWMD to continue its outreach efforts to the Tribes in conjunction with the Project. The EPA also notes that the EPA works closely with both Tribes on Everglades matters and is committed to working with state and federal partners with regard to the Tribes' water quality and water management concerns.

Environmental Justice (EJ): The EPA notes that the current tentatively selected plan is entirely on state lands and does not take any agricultural lands out of production. Should changes to the tentatively selected plan require the conversion of agricultural lands to a component of the project, then the EPA recommends the USACE and SFWMD evaluate impacts to low income, minority farmers, and farm workers.

[1] Cypress, Billy. Letter to Ernie Marks, Executive Director, SFWMD *RE: Discrimination in Water Management Decisions/EAA Reservoir Chapter 2017-10*. Jan 8, 2018.

From: jay defrank
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc: elisedefrank@gmail.com
Subject: [Non-DoD Source] Request for public input on EAA Reservoir Plan
Date: Wednesday, April 18, 2018 1:10:27 PM

This email is in response to the Army Corps' request for public input. We live on Hutchinson Island in Stuart. We know first hand the damages discharges from Lake Okeechobee do to our waterways, our overall environment, our economy and our quality of life. It is crucial to those of us who live along St Lucie Inlet and the Indian River Lagoon that the EAA reservoir plan delivers what it promises: 370,000 acre-feet of clean water sent south to Florida Bay, and not discharged into our rivers. Thank you.

Sincerely,

James DeFrank, Ph.D.
Colonel, USAF (ret.)
391 NE Plantation Rd, Unit 224
Stuart, FL 34996

Sent from my iPhone

From: jim l kelley
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Lake O
Date: Sunday, April 22, 2018 3:22:54 PM

Dear Stacie Auvenshine,

I spend about 4 months a year on Sanibel and do a lot of fishing. I believe that the water coming from Lake Okeechobee is hurting the water quality and fishing in our area. It seems to me that our government is supporting higher sugar prices for US citizens and helping to create a bad situation for our water quality in FL.

I also believe that there are a lot of environmentalists who for some reason believe that the water from Lake O is too dirty to be sent through the everglades but not too dirty to send to us. The everglades needs more fresh water we need less. The natural flow of water would be to allow it to go through the everglades. The only reasons that we are getting too much fresh water and the everglades is not getting enough are created by special interests and bad government.

The best two solutions would be to stop creating advantages for the Big Sugar industry and allow the fresh water overflow from Lake O to go naturally through the everglades. I know that that is an over simplification but it is the truth. If there is anything that the Corps can do to help solve this man made bad situation it would be greatly appreciated.

Sincerely,
Jim Kelley

From: Joanne Heroy-Giller
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] A vote of support for SFWMD March 26th plan
Date: Sunday, April 22, 2018 8:53:54 AM

Plz. make this happen to help protect our vital Caloosahatchee!
Thank you for your consideration.

Joanne (Heroy-Giller)
Ft. Myers , FL
239 850 1051

From: Joe Gilio
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Environmental review of State"s [Florida] EAA reservoir study
Date: Monday, April 30, 2018 10:15:02 PM
Attachments: USACE response to SFWMD"s EAA reservoir..pdf
Best EAA-res-analysis_1-22-18.pdf

Dear Ms. Auvenshire,

I have attached a letter re: above subject. Much of the information developed therein was in coordination of Dr. Jay O'Laughlin, Ph.D. . That said, Dr. O'Laughlin is not a participant in this letter and as such any errors and omissions developed herein in conjunction with our original joint white paper, also attached, are all mine.

Original O'Laughlin and Gilio white paper on "outside the box" options for the EAA Project/STA Project

Sincerely,

Joseph L. Gilio, PWS Emeritus

To: USACE

From: Joseph L. Gilio, PWS Emeritus

Date : April 30, 2018

Item: Critique of SFWMD's Project G of CERP

Much of this critique is under the ability of the State of Florida and its lead agency the South Florida Water Management District [SFWMD] to rectify. I verbally submitted brief remarks pertaining to these shortcomings at the public hearing of the SFWMD board on March 8, 2018.

There are three shortcomings and a new chemical train concept that could be added to the design of the reservoir project, all combined potentially reducing northern estuary discharges to annual flows amendable to major possibly full recovery of the severely impacted estuaries and the input rivers.

The submitted reservoir concept

SFWMD's submittal to the USACE for a new reservoir of 240,000 acre-feet [AF] on 10,100 acres of A-2 parcel and 6,500 acres of storm water treatment area [STA] proposes to convey 350,000 AF/yr. of Lake Okeechobee water south into the Everglades Protection boundary [EPA] and eventually flow into the Everglades National Park [ENP] and thence Florida Bay.

This concept will utilize both a new 6,500-acre STA and the adjacent functioning STA's ¾ as water treatment flowways in order to meet the 350,000 AF/ yr. objective. CERP's Goal 1 of moving 300,000 MAF lake Okeechobee water would be achieved. This objective while commendable lacks restitution of full lake volume flow into the remnant Everglades and Florida Bay.

Shortcoming # 1- Lack of full volume flow from lake to Everglades

Over the past decade, FEB A-1 and STA's ¾ have processed approximately 1.1 million AF/yr. of Everglades Agricultural Area [EAA] farmlands and lake communities stormwater runoff with minimal treatment of Lake Okeechobee waters. The [EAA + lakeside communities /Lake Okeechobee] ratio has been about 9/1 leading to probable future use conflicts between existing and this proposal's increased use. Alternatively, use of STA ¾ for EAA reservoir treatment may be curtailed and fall short of CERP goal 1 of moving 300,000 MAF at 10 ppb TP Annual geometric Mean [AGM] into the EPA.

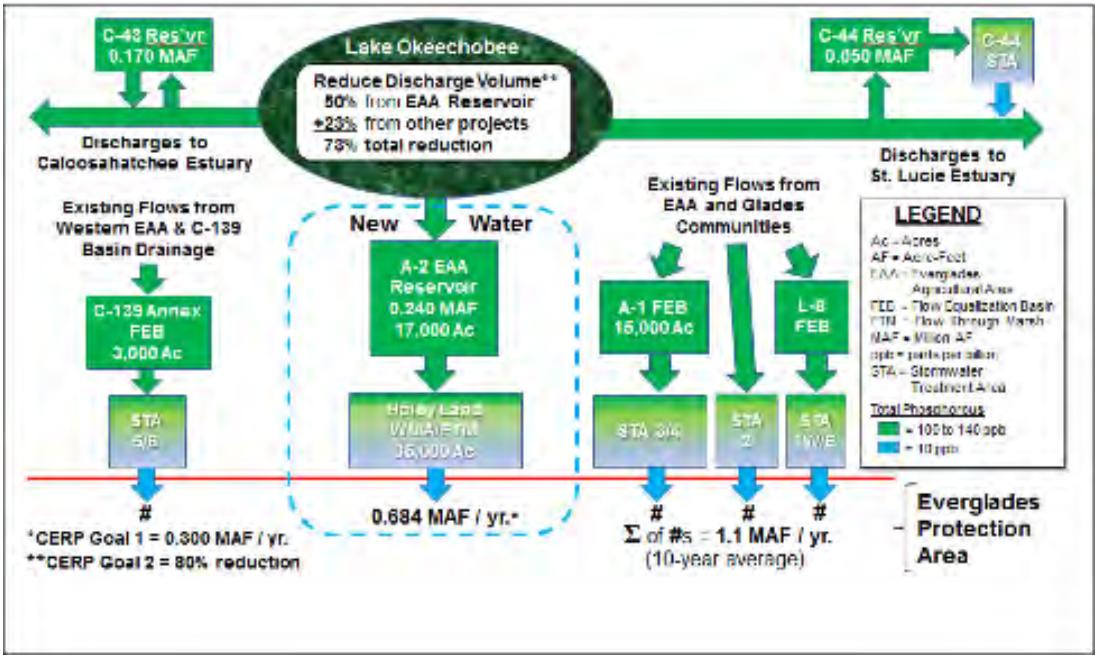
Shortcoming # 2 -- Lack of Full volume attainment Flow to the remnant Everglades

The annual 35 yr. mean inflow water into Lake Okeechobee from north, east and west is about 2.5 MAF/yr. Assuming a 70% Everglades areal remnant, then about 1.8 MAF/yr. would approximate annual full water volume inputs into the EPA. However, past decadal inflow of 1.1 MAF and 350,000 AF [this reservoir project] equals 1.4 MAF or 0.4 MAF less than full historical inflow. And if FEB A-1 & STA ¾ prioritization conflicts occur, the EAA reservoir project may only

attain about half of its goal or 200,000 AF/yr. further decreasing full volume restoration by 0.5 MAF annually.

Shortcoming # 3 - State land capacity not fully realized

SFWMD's concept design is intended to stop Lake Okeechobee's discharges to the Caloosahatchee River and estuary [CR&E] by 55 % volume and major discharge events by 63 %. O'Laughlin and Gilio's 2018 white paper [attached] proposed two options for expanded CERP Project G's EAA reservoir water treatment on State of Florida owned Holleyland's 35,000 ac. and Rotenberger's 25,000 ac. Both are ideally situated adjacent to SFWMD's proposed EAA location.

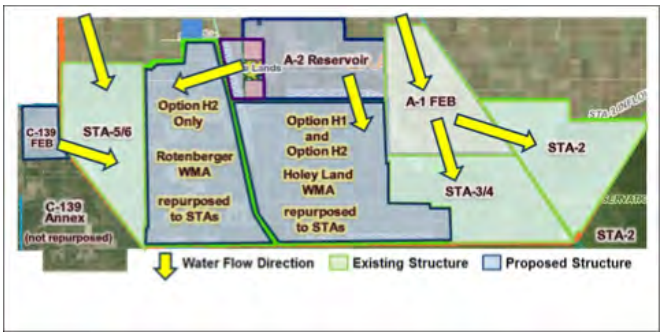


Using Holleyland alone for an STA would increase Lake Okeechobee's flow south into the EPA from 33% to 50% [360,000 AF to 672,000 AF] or a 66% gain with no additional land purchase. Adding other CERP & CEPP projects would increase that flow to 76% with concomitant decreases in volume and discharge events to the northern estuaries. If both tracts were combined, the 64,000-ac. treatment could increase the Lake Okeechobee flow south up to 1,20,000 AF, a 330% increase and decrease northern estuary discharges by up to 92%. At this level of discharge volume, there would be a very high probability of full northern estuary recovery.

Holleyland is more amendable to timely inclusion as it lacks roughly 40 parcels of privately owned parcels within Rothenberger. Noteworthy, is that both tracts were fully functional components of the sawgrass dominated slough, island troughs of the historical Everglades and their management plans call for Everglades restoration.

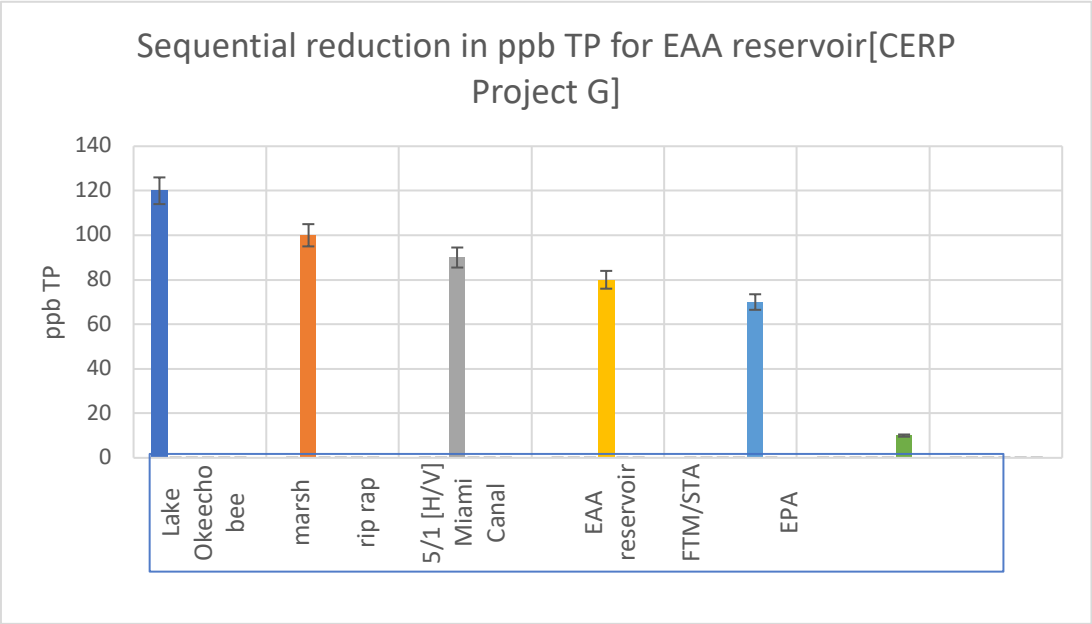
The outflow of the new reservoir into part of the Holleyland tract for water quality treatment to achieve federal 10 ppb TP annual geometric mean [AGM] prior to entry into the Everglades

Protection area [EPA] would turn about a third of Holleyland [10,000 ac.] into an STA. The remainder 25,000 ac. [70%] could be restored to full Everglades form and function, a goal not included in CERP or CEPP. STA's have proven to have some Everglades restorative value even though water quality levels are above Federal standards.



Enhancement of water quality for the concept G project through chemical trains

A sequential TP reduction train composed of expansion of the existing marsh at the southern edge of Lake Okeechobee, an over the top of bank adjustable weir as inflow into the Miami canal, a limestone rip rap cascade from the weir prior to canal entry, an emergent aquatic planting [EAV] on a 5/1 [H/V] edge, a 14 foot deep EAA reservoir with H/V ranges from 4/1 to 10/1 planted with EAV an submergent aquatic vegetation [SAV] , 10,000 ac. of STA designed to be removed of vegetation and sediment periodically and the remainder 25,000 ac. restored as a Flow Thru Marsh [FTM] as a mimic of its historical form and function.



Will a 55% water volume reduction and 63% major discharge events allow northern estuarine past form and functions

It is conjecture at this point in our knowledge to determine what overall volume reductions and percentage historical discharge events would either allow natural processes to oxidize the millions of tons of anaerobic muck that has settled in the CR&E and SLR&E ecosystems or whether man's intervention will be needed to restore the hard bottomed, seagrass dominated estuaries and tapegrass rivers they were prior to Lake Okeechobee discharges that started a century ago. Certainly, the greater the volume and frequency of Lake Okeechobee flow south rather than into the northern estuaries, the greater the probability of natural or man-induced restoration.

Economic Impacts

Various organizations both NGO's and government have estimated the economic benefits or the negative impacts from past and current discharges of Lake Okeechobee waters into the northern estuary. These economic impacts in recovery are a direct function of the volume reduction and major discharge frequencies to the northern estuaries. The greater the flow south into the EPA and its concomitant reduction to the northern estuaries, the greater the realization of full potential economic values that these norther rivers and estuaries formerly provided. Missing is a full increase of lost ecosystem values provided by seagrass and hard bottomed communities.

Some of these positive and negative economic estimates are:

1. Lost market value for residences [especially river frontage] in Martin, St. Lucie and Lee counties –estimate $ 1 Billion dollars.
2. Lost mortgage doc stamps revenue on lower sales prices.
3. Lost water borne activities -boating, fishing, recreational use restrictions. TCRPC estimates $1.1 Billion in total value from the Indian river Lagoon portions of St. Lucie and Martin Counties for 2014. This estimate does not include the St. Lucie River portion of these two counties. The $1.1 Billion revenue stream was severely impacted during the 1998-99, 2015-2016 Lake Okeechobee discharges.
4. Lost seasonal rentals due to Microcystis bloom occurrences. What % volume decrease to northern estuaries is needed to eliminate toxic bloom occurrences in the receiving estuaries and rivers.
5. Lost ecological value of the southern IRL where over 800 different fish species had been identifies as using some portion of that area for all or some of their life functions.

Summary

The major critique of the SFWMD's Concept G' EAA reservoir is that it will store and treat less Lake Okeechobee waters than possible in two areas:

1. It reduces discharges to the northern Caloosahatchee and St. Lucie River ecosystems by 55% volume when the potential for 76% even 92% reductions are possible using existing state owned Holleyland and Rotenberger tracts.

2. The SFWMD proposal fails to meet Goal II of full water volume south into the EPA for remnant Everglades and Florida Bay restoration.
3. How much economic, human & non-human health conditions and ecological restoration will be lost, quite possibly forever, if only 55% volume reduction and 63% major discharges are accomplished through implementation of Concept G reservoir as currently presented to the USACE.

References Cited

Florida Realtors. 2015. The impact of water quality on Florida's home values. Florida Realtors, Orland, Florida. https://www.floridarealtors.org/ResearchAndStatistics/Other-Research-Reports/upload/FR_WaterQuality_Final_Mar2015.pdf

Gilio, J.L. 2017. Guest column: Three win-win options for Senate Bill 10. *TCPalm*, April 12. https://www.tcpalm.com/story/opinion/contributors/2017/04/12/guest-column-three-win-win- options-senate-bill-10/100369532/

O'Laughlin, J. 2017. Arguments against the EAA Reservoir and rebuttals. Paper prepared for The Guardians of Martin County, April 16. Available online at http://theguardiansofmartincounty.com/wp-content/uploads/2017/04/arguments-rebuttals_EAA- reservoir_JayOL_04-16-2017.pdf

O'Laughlin and Gilio, 2018. White paper. "Outside the Box" Options for the EAA Reservoir /STA Project. [attached]

SFWMD. 2018. Progress report on SFWMD implementation of Senate Bill 10 (Section 373.4598 Florida Statutes). South Florida Water Management District, West Palm Beach, Florida. Available online at https://www.sfwmd.gov/sites/default/files/documents/eaa_res_progress_report_fl_leg.pdf

http://www.tcrpc.org/council_meetings/2016/July2016/11_IRLValuation.pdf

"Outside the Box"[1] Options for the EAA Reservoir/STA Project

by

Jay O'Laughlin, Ph.D.[2]

and

Joseph L. Gilio[3, 4]

January 22, 2018

(revised from January 4, 2018)

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1. Florida Senate President Joe Negron said he wanted "state engineers to think ***outside the box*** and outside the 'footprint' they're considering for a reservoir south of Lake Okeechobee" (interview in *TCPalm*, December 14, 2017, emphasis added). As yet South Florida Water Management District (SFWMD) engineers have not done so.

2. Jay O'Laughlin, Ph.D., is Professor Emeritus and Director Emeritus, Policy Analysis Group, College of Natural Resources, University of Idaho. He lives in Hobe Sound adjacent to the Indian River Lagoon, and writes water policy analyses* for The Guardians of Martin County, a 501(c)3 organization committed to educating Martin County residents about balanced use of natural and man-made resources. Contact: jayo@uidaho.edu

3. Joseph L. Gilio is a Professional Wetlands Scientist Emeritus, with 40 years of experience designing and maintaining constructed wetlands and lakes achieving TMDL for total phosphorous. He lives in Palm City on the South Fork of the St. Lucie River. Contact: www.jlgilio.com

4. The authors acknowledge with thanks help from Gary Goforth, P.E., Ph.D., consulting water resources engineer in Stuart, Florida, with 35 years of experience including design, construction, and operation of 41,000 acres of constructed wetlands. Contact: www.garygoforth.net

* For example, "Florida's Future Water Supply Depends on Improved Surface Water Management" (December 2016) and "Arguments Against the EAA Reservoir and Rebuttals" (April 2017). These documents can be read or downloaded at, respectively:

http://theguardiansofmartincounty.com/wp-content/uploads/2016/12/GMC_Water_Position.pdf

http://theguardiansofmartincounty.com/wp-content/uploads/2017/04/arguments-rebuttals_EAA-reservoir_JayOL_04-16-2017.pdf

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Executive Summary

The Florida Legislature passed a law in 2017 authorizing and partially funding the creation of a water storage reservoir and necessary water quality treatment facilities in the Everglades Agricultural Area (EAA) south of Lake Okeechobee. The purposes of the project are a) to send more water south of the EAA into the Everglades Protection Area and b) to reduce the discharge of excess Lake Okeechobee water to the estuaries east and west of the lake. The reservoir is one project component of the Comprehensive Everglades Restoration Plan (CERP).

Current Options. The South Florida Water Management District (SFWMD) is responsible for the project, and has two options for meeting requirements in the law. The Everglades Foundation (EF) has proposed a different project configuration. We call these the current options, and analyze the effectiveness of their designs to meet CERP goals and water quality standards. In addition we identify where the EF water treatment areas could be built on state-owned lands.

All three current options are designed to meet CERP Goal 1 of sending an additional 300,000 acre-feet (ac-ft) of water south of the EAA each year. None of the three current options comes close to meeting CERP Goal 2, which is an 80 percent reduction of discharges from the lake from all authorized CERP projects. We calculate that either of the two SFWMD options alone would reduce discharges by 29 percent, the EF option by 32 percent. Based on SFWMD analysis other authorized CERP projects together would reduce discharges by an additional 23 percent. SFWMD and EF options would reduce discharges by 50-55 percent, well short of CERP Goal 2.

Modified Options. Two hybrid "outside the box" options analyzed herein improve on the performance of the three current options. Both use the same reservoir footprint as the EF option (the A-2 parcel) but with different water quality treatment configurations on state-owned lands near the reservoir. The first hybrid option (H1) would more than double CERP Goal 1 and by itself would reduce discharges by 50 percent. The second option (H2) would send 1.2 million ac-ft/yr south of the EAA, or four times CERP Goal 1 and by itself reduce discharges by 69 percent. H2 is the "optimal configuration" to meet CERP goals without needing to acquire private lands.

When discharge reductions from other authorized CERP projects are added to those of project options, H1 would reduce discharges by a total of 73 percent, and H2 by 92 percent. Flow schematic diagrams for the five options, plus analytical results, are provided in **Appendix A**.

H1 would repurpose the Holey Land Wildlife Management Area (WMA) for water quality treatment; H2 would add Rotenberger WMA. WMAs are adjacent to the A-2 parcel and are owned by the Internal Improvement Trust Fund. The Board of Trustees is comprised of the governor and cabinet. "The Board has a duty to hold lands in trust for the use and benefit of the people of the state" (Florida Statutes 253.001). Therefore the Board's duty is to weigh the benefits of repurposing WMAs compared to their current use. The H2 option, for example, would create an estimated 31,000 temporary construction jobs and 1,000 new permanent jobs operating and maintaining infrastructure and providing recreation opportunities.

Introduction

In 2017 the Florida Legislature passed a law authorizing the creation of a water storage reservoir and necessary water quality treatment facilities (such as stormwater treatment areas, or STAs) in the Everglades Agricultural Area (EAA) immediately south of Lake Okeechobee and appropriated $800 million to do so. If the project meets requirements of the Comprehensive Everglades Restoration Plan (CERP), the federal government will also provide $800 million for the project. The law was signed by Governor Rick Scott in May 2017.

This report analyzes three current options for the EAA Reservoir/STA project; two are offered by the South Florida Water Management District (SFWMD) and one by the Everglades Foundation (EF). We offer two "outside the box" options that improve considerably on the performance of the SFWMD and EF options.

EAA Reservoir/STA Project Goals

The Everglades Agricultural Area (EAA) Reservoir project was conditionally authorized in the Water Resources Development Act of 2000 as project component G of the Comprehensive Everglades Restoration Plan (CERP). The EAA is 700,000 acres immediately south of Lake Okeechobee, of which approximately 500,000 acres are farmed, mostly for sugarcane. According to the SFWMD (2018) CERP goals for the EAA Reservoir project are:

1) 300,000 acre-feet per year (ac-ft/yr) of additional water moving south from the EAA into the Everglades Protection Area, and
2) reduce by 80 percent discharges of excess Lake Okeechobee water to the Northern Estuaries (St. Lucie and Caloosahatchee).

In addition, the EAA Reservoir project must meet water quality standards. Stormwater Treatment Areas (STAs) are constructed wetlands where water flow is controlled so that aquatic vegetation can uptake or absorb phosphorous, the most problematic pollutant in South Florida. The success of the EAA Reservoir project in meeting its goals depends on the adequacy of STAs for treating water stored in the reservoir before it can move south.

In 2017 the Florida Legislature passed Senate Bill 10 and in May 2017 Governor Rick Scott signed it (Florida Statutes 373.4598 Water Storage Reservoirs). The South Florida Water Management District (SFWMD) is charged with designing and constructing the EAA Reservoir, and the law specifies the minimum size as 240,000 acre-feet (ac-ft) of nominal storage and identifies 31,000 acres of lands the state already owns that the SFWMD could use for the reservoir. The law authorizes the SFWMD to acquire additional lands, and if owned privately, only from willing sellers, which means the state cannot exercise its power of eminent domain.

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Assumptions and Analytical Variables

We make several assumptions in this analysis. First, STAs will be filled throughout the year at the depths we specify. Second, the Everglades Protection Area can receive all water flowing out of the EAA STAs that meets water quality standards. Extending the duration of time water is retained in the STA may increase the uptake of phosphorus by vegetation and sediment in the STA (Chen et al. 2015).

Our analytical approach is based on the simple premise that the storage reservoir is not static, but will be managed dynamically so that its effective annual capacity could be several times more than its nominal capacity. Because it does not meet water quality standards, stored water must be treated before it can be sent south. The SFWMD has designed, constructed, and operated six STAs at the southern edge of the EAA. Over the past ten years, the 57,000 acres of STAs in the EAA have treated an average of 1.1 million ac-ft/yr (SFWMD 2017a).

STA effectiveness is a function of area, depth, and rate of flow. We use both 1.5 feet and 4 foot depths, basically doing the analysis twice for each Reservoir/STA configuration. The measure of STA effectiveness we use is the average number of days that water is retained in the STA. The higher the number, the longer water is retained in the STA, and the more time vegetation has to absorb or uptake phosphorous, the major pollutant of concern.

At an average 1.5 foot depth, the 57,000 acres of STAs in the EAA have a Nominal Storage Capacity of 85,500 ac-ft; at a 4 foot depth, 228,000 ac-ft. Dividing the average treatment of 1.1 million ac-ft/yr by the STA Nominal Storage Capacity produces what we call the number of STA Flow Through Cycles per year, which is 12.86 at 1.5 foot STA depth and 4.82 at 4 foot depth. To convert this to number of days the water is retained in the STA, we divide the number of days in one year (365) by the STA Flow Through Cycle, resulting in 28 days at 1.5 foot STA depth and 76 days at 4 foot depth. We can then use these results as a benchmark to compare with calculated STAs for the EAA Reservoir/STA project configuration options. (Descriptions of model variables and calculations formulas are provided in **Appendix B**.)

This approach can only be used if the quantity of water treated per year is provided. We call this the Reservoir Effective Annual Capacity. In essence, the analyst uses this to force calculation of the STA Flow Through Cycle by dividing the Reservoir Effective Annual Capacity by STA Nominal Capacity, which is acres of STAs times depth. Otherwise, we default to the actual STA Flow Through period in the EAA described above, and use it to force the calculation of Reservoir Effective Annual Capacity.

Reservoir Flow Through Cycle is similar to the STA Flow Through Cycle, in that it tells us how many times water can flow into and out of the reservoir in one year, which is how many times the reservoir can be refilled in one year. The more refills, the more efficiently public funds are being used. The number of Reservoir Flow Through Cycles per year multiplied by the Reservoir Nominal Storage Capacity produces what we call Reservoir Effective Annual Capacity. This

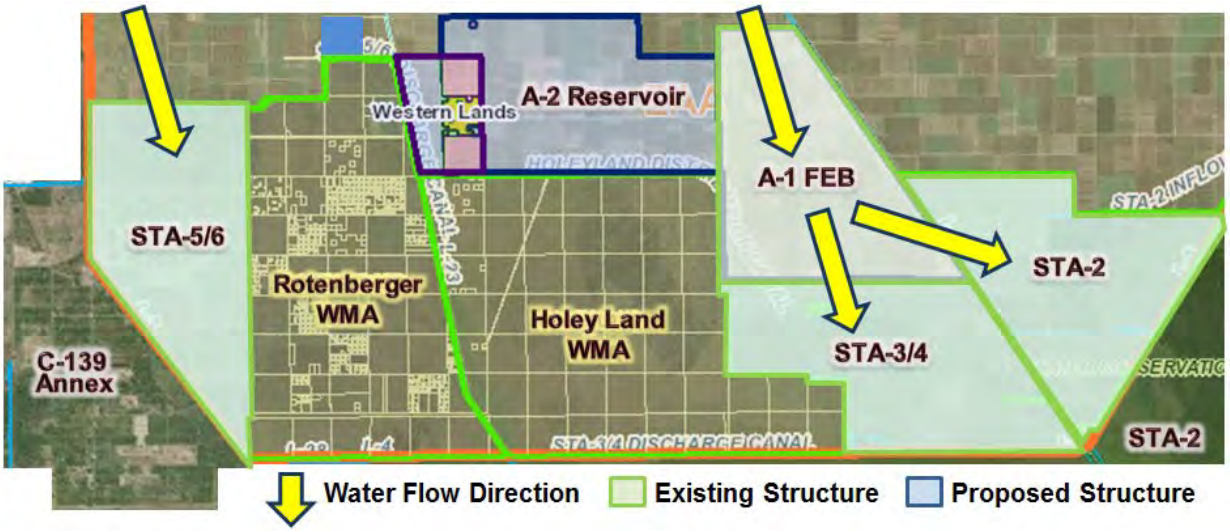
quantity is the same as how many additional acre-feet per year of excess Lake Okeechobee water will flow south into the Everglades Protection Area. This can be compared to the CERP Goal 1 target of 300,000 ac-ft/yr stored, treated and sent south.

Reservoir Effective Annual Capacity is used to calculate project option contributions to attainment of CERP Goal 2. We use actual annual discharges of excess Lake Okeechobee water to the St. Lucie River from 1980 through 2017. Because discharges to the Caloosahatchee are double that to the St. Lucie, we take one-third of the Reservoir Effective Annual Capacity for the St. Lucie River and two-thirds for the Caloosahatchee. In the 18 years when discharges exceeded that reduction benefit, we tally the entire benefit. In years when the benefit was greater than the actual discharges, we tally only the actual discharges as the reduction amount.

Current Options and CERP Goal 1 Attainment

Starting with public meetings in October 2017, the SFWMD has presented two main options. In December 2017, the Everglades Foundation, dissatisfied with the SFWMD options, created one of its own. We will call this the EF option and compare it to the SFWMD options in this section.

SFWMD Options. Both SFWMD options are confined to the 31,000 acres identified in the law. These are called the A-1 and A-2 parcels (see **Map 1**). The State purchased the land from the Talisman Sugar Co. in 1999 to facilitate Everglades restoration. This is the "box" that Senator Negron urged the SFWMD to look outside of for, as the law puts it, the "optimal configuration" of reservoir and treatment areas.

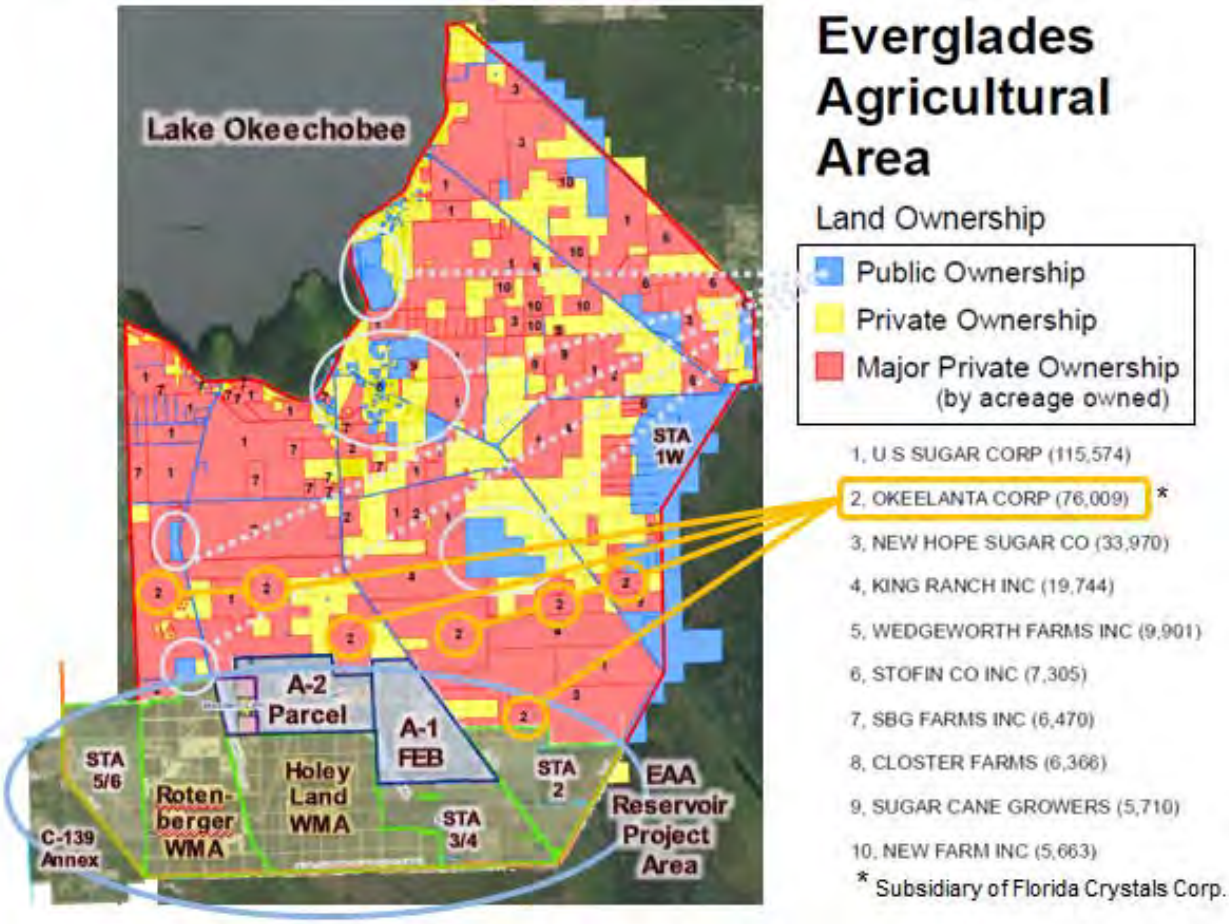


Map 1. EAA Reservoir/STA Project Area

The R240A "best buy" option uses only the A-2 parcel for a 240,000 ac-ft reservoir 23 feet deep and stormwater treatment areas (STAs) to treat the water before it can be sent south. Two alternative configurations were developed, but only the "best buy" variation is considered herein.

The C360C "best buy" option uses the A-2 parcel and repurposes portions of the A-1 parcel, which already has a 4 foot deep flow equalization basin (FEB) on it. (An FEB is a constructed impoundment for providing steady flow to STAs.) Three alternative variations of the R360 option call for a 360,000 ac-ft reservoir 18 feet deep. We consider only the District's C360C "best buy" option.

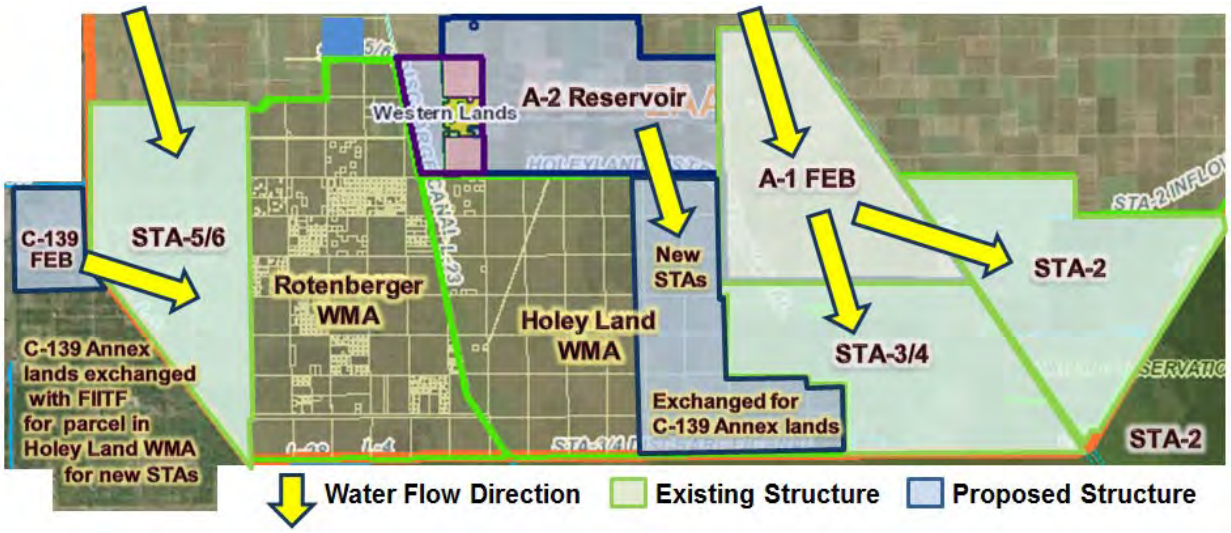
Everglades Foundation Option. The Everglades Foundation (EF) option calls for constructing a 14 foot deep reservoir on the A-2 parcel and leaving the A-1 FEB functioning as is. The EF stated that 13,000 acres of STAs are needed to treat the stored water before it can be released south, but the EF did not go "outside the box" to identify a location for those STAs. According to a story by Treadway (2018), the EF is expecting the SFWMD to exchange lands it owns for private lands on which to construct the STAs. A large proportion of the private lands that are just north of the project area are owned by Okeelanta Corp., a subsidiary of Florida Crystals Corp. owned by the Fanjul family of Palm Beach, Florida, and indicated by orange circles around the numeral 2 on **Map 2**.



Map 2. EAA land ownership with EAA Reservoir project area overlay, plus C-139 Annex. Ownership information from Treasure Coast Regional Planning Commission http://www.tcrpc.org/departments/MapGallery/2016/1604a_EAA_Private.pd

As **Map 2** indicates, the SFWMD itself has more than 18,000 acres, including 17,890 acres in the C-139 Annex and an unidentified section abutting the north side of the Rotenberger Wildlife Management Area (WMA). The Holey Land and Rotenberger Wildlife Management Areas (WMAs) are obvious candidates for STAs, as they are adjacent to the A-2 parcel where the reservoir would be built.

To facilitate the EF option, we make an "outside the box" suggestion that exchanging a 13,000 acres parcel in the C-139 Annex owned by the SFWMD for a similar-sized parcel in the Holey Land WMA owned by the Florida Internal Improvement Trust Fund is a potential opportunity to maintain the A-1 parcel within the "box" as a flow equalization basin (FEB) and build new water quality treatment areas on state-owned lands near the reservoir (**Map 3**).



Map 3. Everglades Foundation option possibility for its unidentified STA footprint: Exchanging 13,000 acres of C-139 Annex lands for easternmost portion of Holey Land WMA for STAs

The Board of Trustees of the Florida Internal Improvement Trust Fund is comprised of the governor, attorney general, chief financial officer, and commissioner of agriculture. "The Board has a duty to hold lands in trust for the use and benefit of the people of the state" (Florida Statutes 253.001). "The Board may exchange lands under its control for other lands in the state and may fix the terms and conditions of any such exchange" (Florida Statutes 253.42(1)).

In 1983 the Board signed a Memorandum of Agreement (MOA) with the SFWMD and two agencies (since renamed the Florida Department of Environmental Protection and Florida Fish and Wildlife Commission) allowing the "construction and operation of a water control system that attempts to restore and preserve natural Everglades habitat" on the Holey Land WMA (Kosier and McBryan 2015).

The SFWMD is planning an 11,000 acre-feet FEB (~3,000 acres) as part of the Restoration Strategies program on the northern portion of the C-139 Annex parcel (**Map 3**). The remaining C-139 Annex lands could provide the 13,000 acres that the EF option needs for its STAs. However it would likely be difficult to convey water from a reservoir on the A-2 parcel to the C-139 Annex lands.

To overcome the conveyance hurdle, an exchange of 13,000 acres of the C-139 Annex for a like amount in the eastern part of the Holey Land WMA would allow creation of new STAs adjacent to the reservoir, as indicated on **Map 3**. The C-139 Annex was purchased from U.S. Sugar Corporation in 2010 for water quality purposes, including reducing discharges of excess Lake Okeechobee water into the Northern Estuaries.

CERP Goal 1 Attainment. At a public meeting on December 21, 2017, SFWMD hydrologic modeler Walter Wilcox presented a slide stating that "All scenarios [are] close to achieving [the] desired increase of 300,000 ac-ft average annual flow south." Therefore we will assume that all SFWMD options meet CERP Goal 1 and use that desired increase as a "forcing" variable to calculate a measure of STA effectiveness, which we call STA Flow Through. It is the number of days that it takes for water to flow into and out of the STA. STA Flow Through is the water soak time for reducing pollutants.

If Lake Okeechobee water is being held in the reservoir or in the STAs, then this volume of water is not being discharged to the Northern Estuaries (St. Lucie and Caloosahatchee). This is a great benefit whether or not that water meets water quality criteria for immediate release south of the EAA. Even if the STA cleanses lake water to standards, downstream levels may mean temporary retention before southward flow.

In a letter to the SFWMD dated December 19, 2017, the EF said that its proposal could exceed CERP Goal 1 and send 340,000 ac-ft/yr south of the EAA. We accept that, as we did the similar claim by the SFWMD, and will also use these as a forcing variable to calculate STA Flow Through in days (see **Appendix B** for details).

Table 1 summarizes analysis of the two main options presented by the SFWMD and that of the EF. The SFWMD R240A "best buy" option is for 240,000 ac-ft of Reservoir Nominal Storage Capacity; the C360C "best buy" option for 360,000 ac-ft; the EF option puts a 240,000 ac-ft reservoir on 17,000 acres (**Table 1**, Col. [2]). Each option is analyzed at two STA depth scenarios: an average depth of 1.5 feet, and the maximum 4 foot depth.

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Table 1. Summary Analysis of Current Options

Reservoir Features				STA		Project Analysis			
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]
							Flow Through		
Option Identifier	Nominal Storage Capacity (ac-ft.)	Acres	Depth (ft.)	Acres	Nominal Capacity at 1.5 ft depth (ac-ft)	Total Acres	STA 1/ (days)	Reser-voir 2/ (cycles per year)	Reserv'r Effective Annual Capacity (ac-ft/yr) 3/
SFWMD R240A	240,000	10,100	23	6,500	9,750	16,600	12	1.25	300,000
SFWMD C360C	360,000	19,700	18	11,500	17,250	31,200	21	0.83	300,000
Everglades Found'n	240,000	17,000	14	13,000	19,500	30,000	21	1.42	340,000
					at 4 ft depth				
SFWMD R240A	240,000	10,100	23	6,500	26,000	16,600	32	1.25	300,000
SFWMD C360C	360,000	19,700	18	11,500	46,000	31,200	56	0.83	300,000
Everglades Found'n	240,000	17,000	14	13,000	52,000	30,000	56	1.42	340,000

NOTES: STA = Stormwater Treatment Area; ac-ft = acre-feet
1/ STA Flow Through (days) = 365 days/yr ÷ (Reservoir Effective Annual Capacity [Col. 10] ÷ STA Nominal Capacity [Col. 6])
2/ Reservoir Flow Through Cycles per year [Col. 9] = Reservoir Effective Annual Capacity [Col. 10] ÷ Reservoir Nominal Storage Capacity [Col. 2]
3/ Reservoir Effective Annual Capacity [Col. 10] is a "forcing" variable entered by the analyst for the purpose of calculating STA Flow Through [Col. 8]

The SFWMD R240A option would need 1.25 Reservoir Flow Through Cycles per year to meet the CERP Goal 1; the C360C could do it with 0.83 cycles (**Table 1**, Col. [9]). Then the model is solved for STA Flow Through (see **Table 1**, Notes, and a more detailed explanation in **Appendix B**). As cited earlier (Chen et al. 2015), extending the time water stays in the STA may allow longer contact with vegetation and sediment so that the level of total phosphorous can be reduced. The SFWMD C360C and EF options at 4 ft STA depth both have water retained in the STAs for 56 days (**Table 1**, Col. [8]). The other options and scenarios may not be able to meet water quality standards because the water may not be retained in the STAs for enough time.

Current Options and CERP Goal 2 Attainment

According to Matt Morrison, SFWMD Federal Policy and Coordination Bureau Chief, CERP Goal 2 is to reduce by 80 percent discharges of excess Lake Okeechobee water to the Northern Estuaries (St. Lucie and Caloosahatchee). During a presentation at a public meeting on December 21, 2017, he said that other authorized CERP projects plus the EAA R240A project option would reduce discharges a total of 50 percent; the C360C option, 54 percent. Using the data set, model variables and methods described above, the SFWMD reservoir options each reduce discharges by 29 percent. Subtracting that from what Mr. Morrison said, the other CERP

projects will reduce discharges by an average of 23 percent. The EF option is slightly better than the SFWMD options.

Modified Options and CERP Goal 1 Attainment

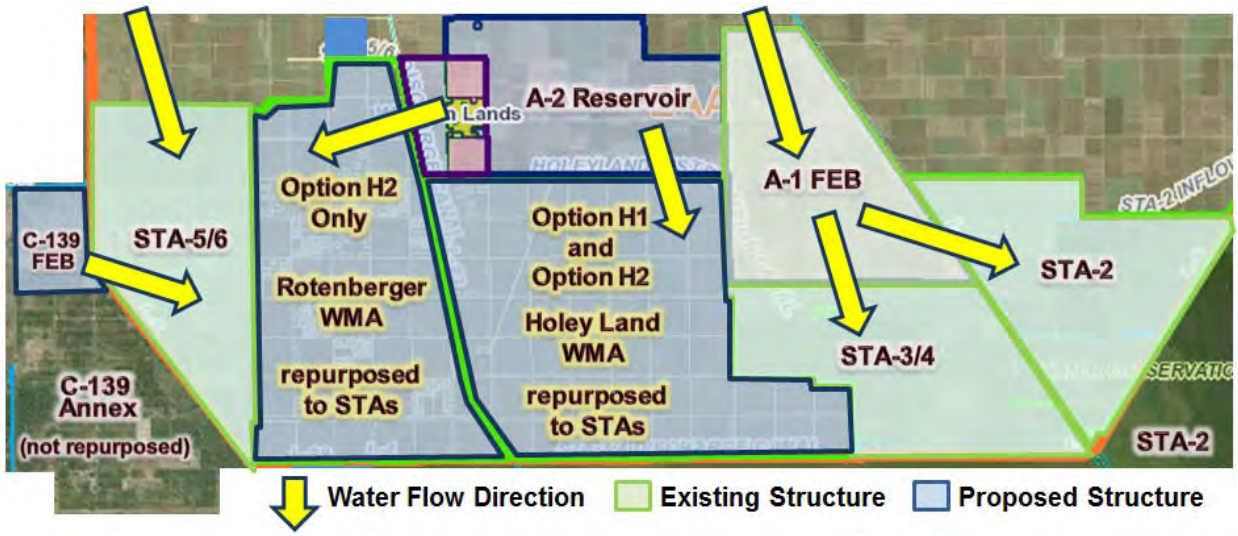
Two different hybrid options are considered. Both offer substantial improvements relative to CERP Goal 1 when compared with the current SFWMD and EF options in **Table 1** above. Each uses the A-2 parcel for the EAA Reservoir, as does the EF option analyzed above, and the A-1 FEB remains as it is. Then two different STA configurations on state-owned lands are considered.

Hybrid R240 H1. The reservoir is the same as the EF option: 240,000 ac-ft on the 17,000 A-2 parcel. The A-1 FEB remains as it is. The 35,000 acres of STAs are in the Holey Land WMA which would be repurposed by the Board of Trustees as a water quality treatment area (**Map 4**).

The H1 option would result in a Reservoir Effective Annual Capacity of 684,000 ac-ft/yr with 1.5 foot deep STAs and 672,000 ac-ft/yr with 4 foot deep STAs (**Table 2**, Col. [10]). The results are not very sensitive to STA depth because flow through time differs.

Hybrid R240 H2. Again the reservoir is the same as the EF option: 240,000 ac-ft on the 17,000 A-2 parcel, and the A-1 FEB remains as it is. The 64,000 acres of STAs results from adding of the 29,000 acres in Rotenberger WMA to the 35,000 acres in the Holey Land WMA (see **Map 4**).

The H2 option does even better than H1, as its STA system is larger. This option would send more than 1.2 million ac-ft/yr south into the Everglades Protection Area (**Table 2**, Col. [10]).



Map 4. Hybrid options R240 H1 and H2: Repurposing Rotenberger and Holey Land WMAs

Table 2. Summary Analysis of Hybrid Options

Reservoir Features				STA		Project Analysis			
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]
							Flow Through		
Option Identifier	Nominal Storage Capacity (ac-ft.)	Acres	Depth (ft.)	Acres	Nominal Capacity at 1.5 ft depth (ac-ft)	Total Acres	STA 1/ (days)	Reser-voir 2/ (cycles per year)	Reserv'r Effective Annual Capacity (ac-ft/yr) 3/
Hybrid R240 H1	240,000	17,000	14	35,000	52,500	52,000	28	2.85	684,000
Hybrid R240 H2	240,000	17,000	14	64,000	96,000	81,000	28	5.21	1.25 million
					at 4 ft depth				
Hybrid R240 H1	240,000	17,000	14	35,000	140,000	52,000	76	2.80	672,000
Hybrid R240 H2	240,000	17,000	14	64,000	256,000	81,000	76	5.12	1.23 million

NOTES: STA = Stormwater Treatment Area; ac-ft = acre-feet; n.a. = not applicable

1/ STA Flow Through is a "forcing" variable for calculating Reservoir Flow Through Cycles/yr [Col. 9] and then Reservoir Annual Effective Capacity [Col. 10]; it is derived from performance of the existing 57,000 acre STA system in the EAA, through which a 10-yr average of 1.1 million ac-ft per year is treated. At 1.5 ft average depth, STA Flow Through is 28 days (365 days ÷ (1.1 million ac-ft/yr ÷ (1.5 ft x 57,000 acres)); at 4 ft depth it is 76 days (same formula, substituting 4 in place of 1.5).

2/ Reservoir Flow Through Cycles/yr [Col. 9] = (STA Nominal Capacity [Col. 6] x (365 days ÷ STA Flow Through [Col. 8])) ÷ Reservoir Nominal Storage Capacity [Col. 2]

3/ Reservoir Effective Annual Capacity = Reservoir Nominal Storage Capacity [Col. 2] x Reservoir Flow Through Cycles/yr [Col. 9]

Modified Options and CERP Goal 2 Attainment

The H1 option by itself would result in a 50 percent reduction of actual discharges during the period 1980-2017. The H2 option would result in 69 percent reduction. In the next section these results are explained in more detail and then compared with those of the three current options.

Analytical Summary of All Options

The average annual discharges from Lake Okeechobee into the St. Lucie were 240,877 ac-ft/yr during the period 1980 to 2017, ranging from near zero to more than one million ac-ft/yr; in 18 of the past 38 years discharges to the St. Lucie exceeded 100,00 ac-ft/yr in 1998 (**Figure 1**, bars). Reductions in discharges are depicted in **Figure 1** as different colored bands overlaying the bar chart. These are the incremental additions to total discharge reductions for each option. Because the model results are not sensitive to STA depth, only the 1.5 foot STA depth is displayed (the 4 foot STA depth chart is nearly identical).

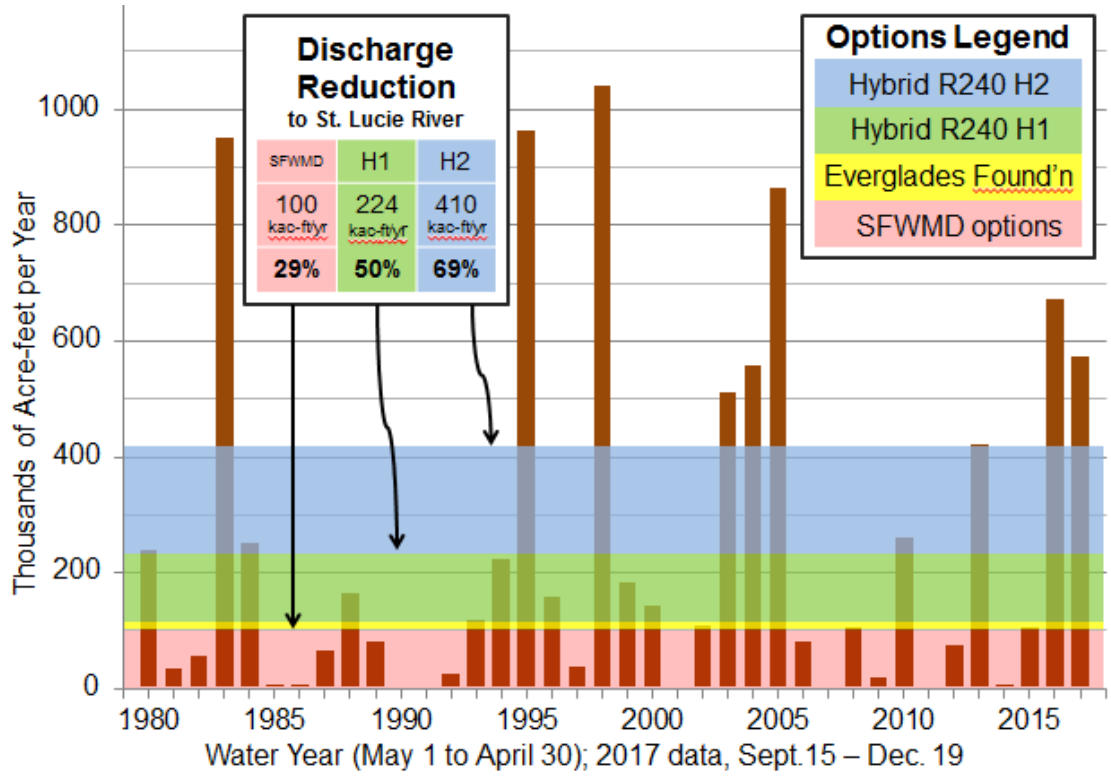


Figure 1. Lake Okeechobee annual discharges to St. Lucie, 1980-2017 (bars), and reductions from EAA Reservoir/STA options (bands), at 1.5 foot STA depth

Caloosahatchee discharges are almost exactly twice that to the St. Lucie, so if reductions in discharges are apportioned that way, with 300,000 ac-ft/yr. moving south from the EAA, then the St. Lucie potential benefit is 100,000 ac-ft/yr, and in the Caloosahatchee, 200,000 ac-ft/yr. In years when actual discharges were less than 100,000 ac-ft/yr in the St. Lucie, then the actual reduction is the amount of the actual discharge. In the 18 years when actual discharges exceeded 100,000 ac-ft/yr, the actual reduction is a maximum of 100,000 ac-ft/yr.

The sum of annual benefits of SFWMD reduced discharges to the St. Lucie during the 38-year period analyzed would have averaged 68,930 ac-ft/yr. In sum, as mentioned above, the SFWMD options would have reduced actual discharges to the St. Lucie by 29 percent (the top of the red shaded area in **Figure 1**). The EF option is only marginally better, reaching 32 percent (the top of the yellow-shaded area in **Figure 1**). Because the H1 and H2 options feature more STA acreage and longer duration of the Reservoir Flow Through Cycle, the percent of actual discharges that would have been reduced had these options been in place is 50 percent with the H1 option (top of the green-shaded area in **Figure 1**), and 69 percent with the H2 option (top of the blue-shaded area in **Figure 1**). As noted above, the results are not sensitive to STA depth, so **Figure 1** displays only the 1.5 foot STA depth.

Table 3 presents summary information and analysis for all options. It is presented in two parts, one for the 1.5-foot deep STAs, and the other for 4-foot deep STAs. Similar to the summary presented in **Table 2**, the results are not particularly sensitive to STA depth.

Table 3. Summary of All EAA Reservoir/STA Project Options

Option Name	Reservoir Area (acres)	Storm Water Treatment Areas (STAs) (acres)	Reservoir Flow Through Cycles per Year	Effective Annual Reservoir Capacity (acre-feet/yr)	Avg. Annual Reduction in Lake O Discharges to St. Lucie (acre-feet/yr)	Actual Reduction in Lake O Discharges, 1980-2017 (percent)
(at 1.5 foot STA depth)						
SFWMD R240A	10,100	6,500	1.25	300,000	100,000	29%
SFWMD C360C	19,700	11,500	0.83	300,000	100,000	29%
Everglades Found'n	17,000	13,000	1.42	340,000	113,333	32%
Hybrid R240 H1	17,000	35,000	2.80	672,000	228,000	51%
Hybrid R240 H2	17,000	64,000	5.20	1.2 million	410,000	69%
(at 4 foot STA depth)						
SFWMD R240A	10,100	6,500	1.25	300,000	100,000	29%
SFWMD C360C	19,700	11,500	0.83	300,000	100,000	29%
Everglades Found'n	17,000	13,000	1.42	340,000	113,333	32%
Hybrid R240 H1	17,000	35,000	2.50	672,000	224,000	50%
Hybrid R240 H2	17,000	64,000	5.33	1.3 million	417,000	69%

As mentioned above, according to the SFWMD, when the discharge reductions from the EAA Reservoir/STA project are added to discharge reductions from other authorized CERP projects, the sum total of reductions is 50 percent for the R240A option and 54 percent for the C360c option. We calculated the discharge reduction from either of the SFWMD options to be 29 percent. This implies that the discharge reduction from other CERP projects is 21 percent for R240A and 25 percent for C360C. The average of these is 23 percent and is applied to the EF option and the two hybrid options. The EF option then would have total reductions of 55 percent. Recall that CERP Goal 2 is 80 percent reduction. Neither the SFWMD options at an average of 52 percent or the EF option at 55 percent come close to this goal.

Again using the average 23 percent discharge reduction from other authorized CERP projects and adding the reductions from the Hybrid R240 H1 and H2 options, the H1 option attains a total 73 percent reduction, and the H2 option a 92 percent reduction (**Figure 2**, a format similar to a chart that the SFWMD used on December 21, 2017).

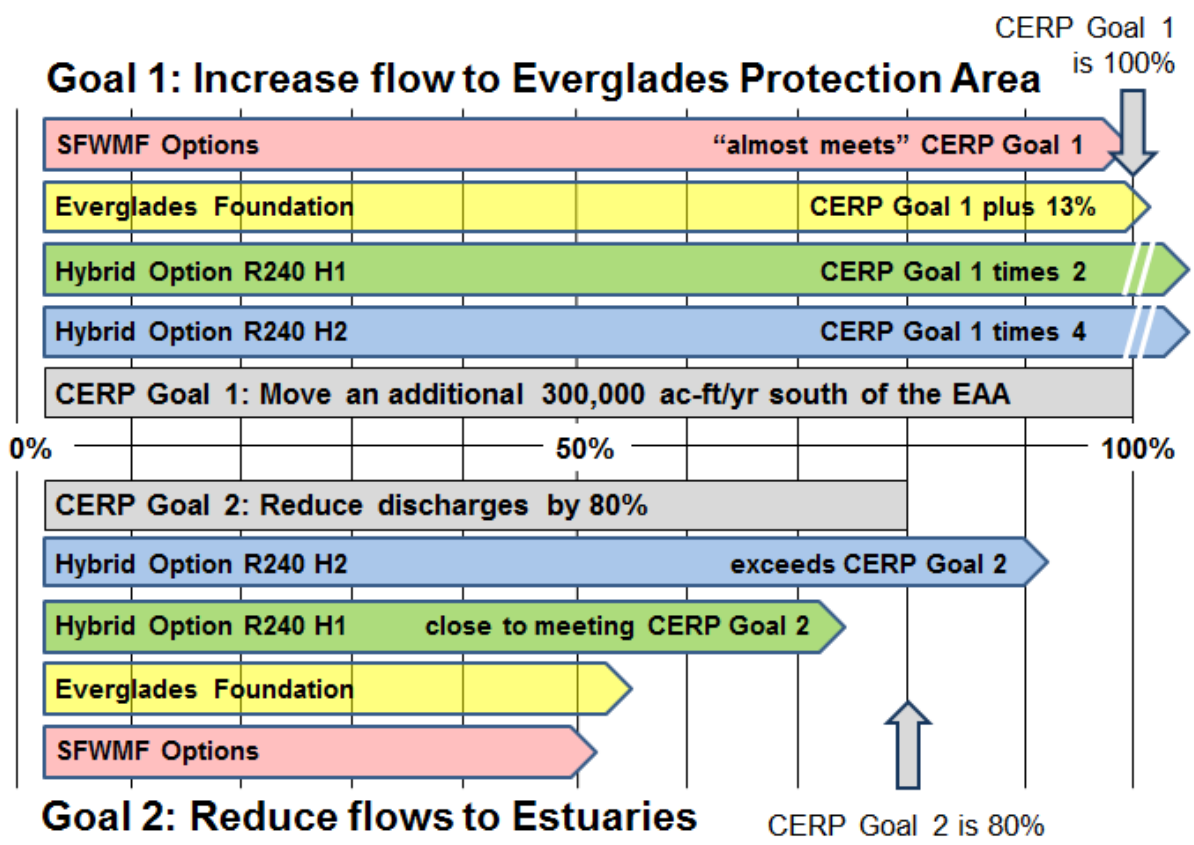


Figure 2. Performance of EAA Reservoir/STA options for improving flow conditions and attaining CERP goals

NOTE: For CERP Goal 2, analysis shows that other authorized CERP projects would reduce discharges by 23 percent, which is added to the reduction from the EAA Reservoir/STA project.

Benefits from the EAA Reservoir/STA Project

As mentioned above, the primary benefit of the EAA Reservoir/STA project is reducing discharges of excess water from Lake Okeechobee in to St. Lucie and Caloosahatchee reservoirs; instead, that water is sent south to be stored and treated before it makes its way south into the Everglades Protection Area where it is needed. There are many types of ancillary benefits that need to be considered.

Public Health. Reduction in discharges has public health benefits because toxic algal blooms such as those experience in recent years coincident with Lake Okeechobee discharges would be reduced, commensurate with the quantity of discharge reduction.

Jobs. Employment is another benefit from this project. Temporary construction jobs would be several times greater than the 1,000 jobs for building the smaller C-44 Reservoir/STA project now under construction in Martin County (see Westlund 2017). After the infrastructure is in place, operations and maintenance would create permanent jobs.

For example, O'Laughlin (2017) estimated employment impacts per 1,000 acres of both reservoir and treatment area footprints (**Table** 4 below). Applying this information to a 17,000 acres reservoir with 13,000 acres of treatment areas would result in more than 10,000 direct jobs in reservoir construction and 14,000 indirect jobs. Treatment area construction would involve 1,500 direct construction jobs and 1,600 indirect jobs. This total of 27,000 jobs is temporary, and would be spread out over however long it takes to build the project infrastructure. Permanent jobs would include 440 in reservoir operations and maintenance as well as recreation and tourism, and another 440 indirect jobs. New treatment area permanent jobs would be about 100 direct jobs, mostly in recreation and tourism, and another 100 indirect jobs (after some allowance for jobs associated with existing facilities). If larger portions of the WMAs were repurposed to water quality treatment areas, the number of jobs likely would increase proportionately. For example, the hybrid R240 H2 option would create 31,000 temporary construction jobs and, after some allowance for existing jobs around the WMAs, 1,000 new permanent jobs.

Table 4. Employment impacts associated with proposed EAA Reservoir/STA project (per 1,000 acres)

Economic Sector*	Employment Impacts** (per 1,000 acres)		
	Direct Jobs	Indirect and Induced Jobs	Total Jobs
Reservoir construction	593	829	1,422
Water treatment area construction	92	130	222
Reservoir operations & maintenance (O&M)	12	12	24
Water treatment area O&M	2	2	4
Reservoir recreation & tourism	14	14	28
Water treatment area recreation & tourism	14	14	28

***** Economic sector data sources, methods used to estimate jobs, and employment impact category descriptions are provided in O'Laughlin (2017, Appendix A).

******Direct jobs are those held by construction workers, and people employed to operate and maintain water resource infrastructure and provide goods and services for recreation/tourism opportunities created by new water storage and treatment areas. Indirect jobs are for purchases of goods and services needed by direct employees, such as motor vehicles and their maintenance. Induced jobs are from spending of income by those with direct and indirect jobs, such as restaurants and entertainment.

Real Estate Values. Based on studies conducted for the Florida Realtors (2015) it is safe to say that improved water quality in the St. Lucie and Caloosahatchee areas would increase the economic value of residential real estate by at least $1 billion.

Enhanced Wildlife Habitat. Several endangered species—Everglades kite and Cape Sable seaside sparrow—would benefit if flow-through marshes were part of the design for water quality treatment areas. Ducks and largemouth bass would also thrive in these areas (Gilio 2017). And as noted above, these areas would create jobs for outfitters and guides.

Flow-through Marshes. Water quality treatment areas can be one of three different types: stormwater treatment areas (STAs), flow equalization basins (FEBs), or flow-through marshes (FTMs). STAs are large, constructed wetlands with inflow and outflow structures for controlling water movement. Aquatic plants in the STAs remove and store excess nutrients (phosphorus) found in the stormwater runoff. An FEB is a constructed impoundment for providing steady flow to STAs (SFWMD 2017b). Like the other two types, a flow-through marsh is a constructed wetland. But unlike then, its walls are gently sloping. They are cheaper to build, operate and maintain and provide better habitat for imperiled birds (Gilio 2017).

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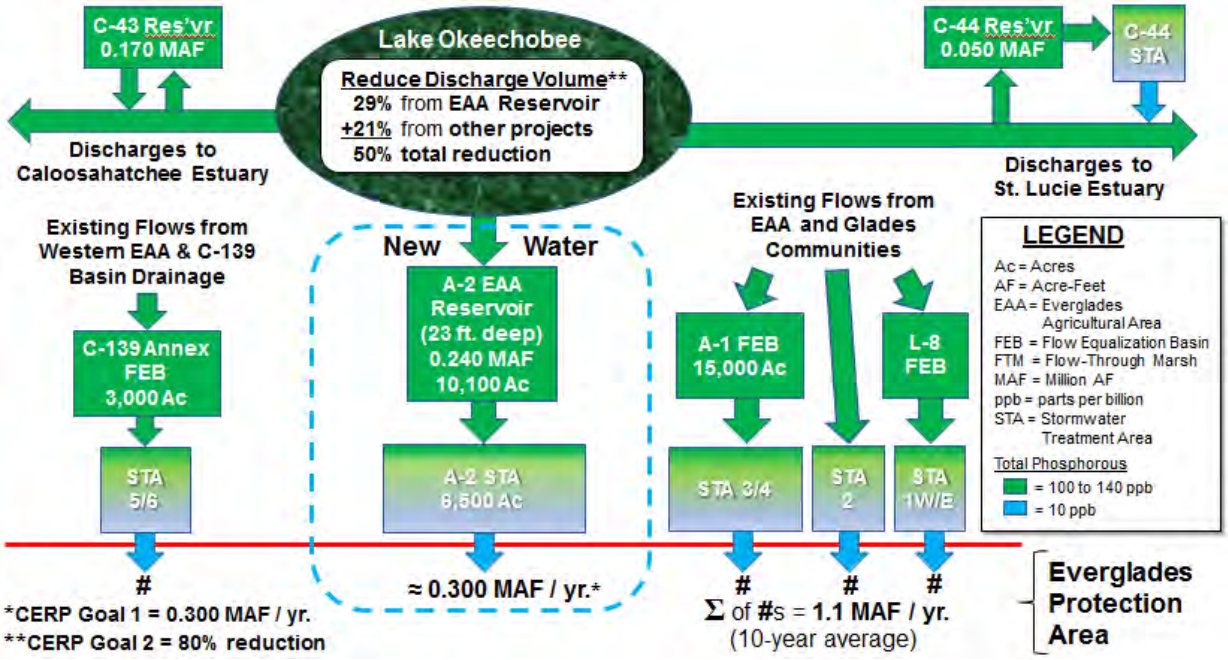
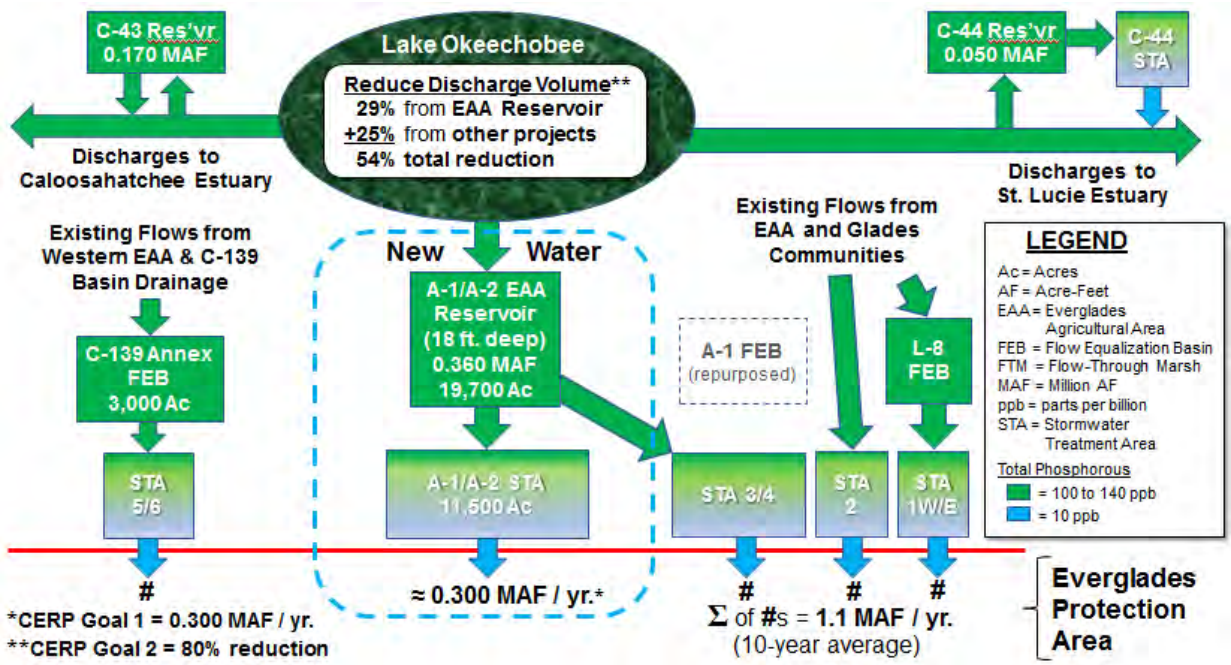
Lake Okeechobee maximum possible release to St. Lucie River, February 6, 2016 totaling 4.9 billion gallons per day (15 million acre-feet per day)

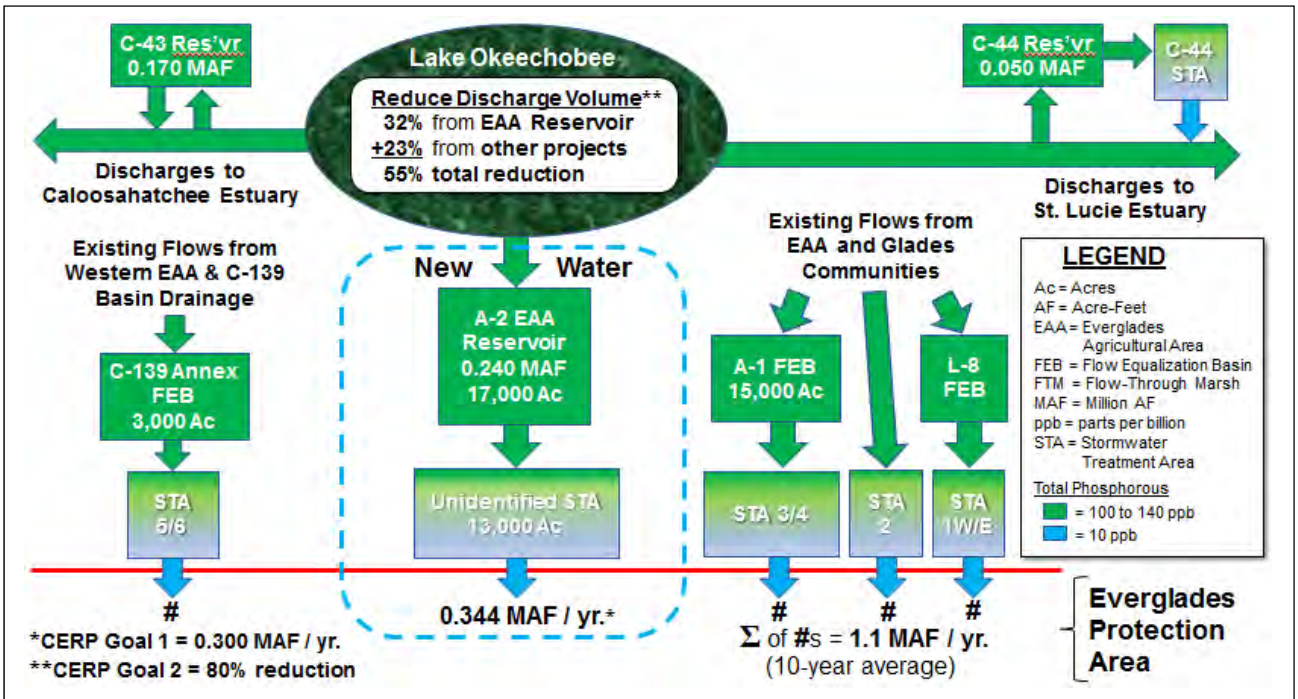
Appendix A. Flow Schematic Diagrams of Three Current and Two Hybrid Options



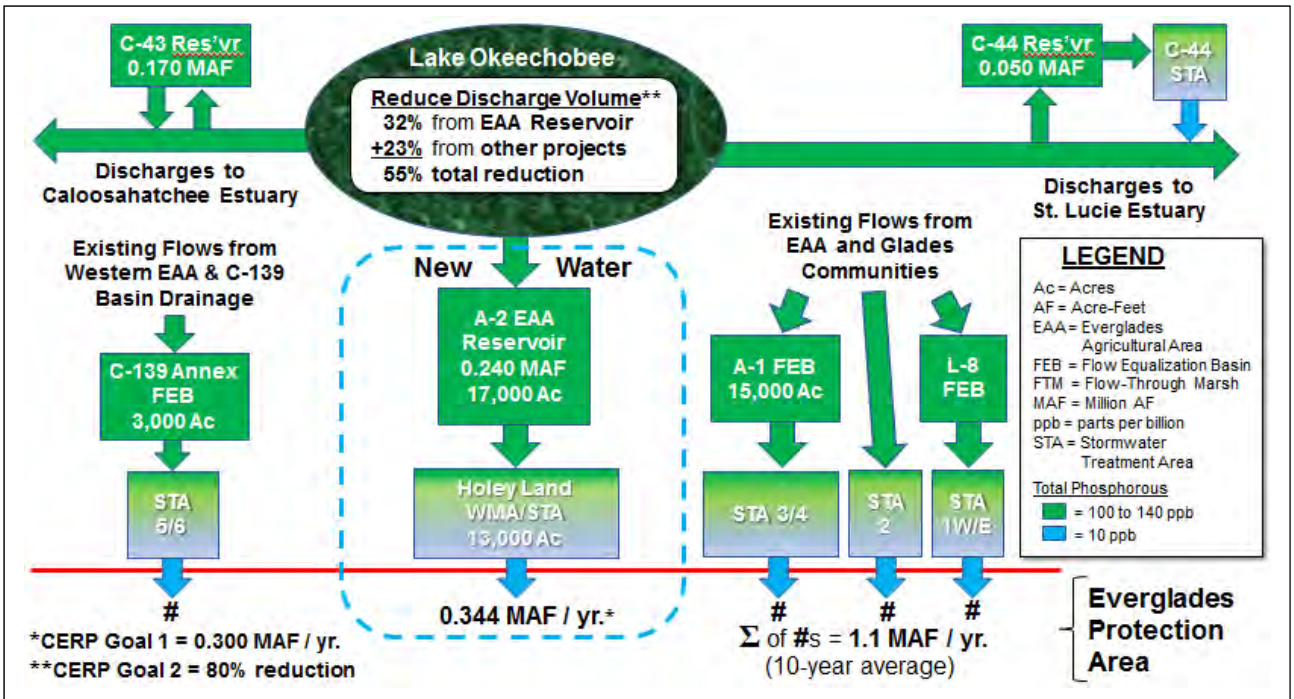
FS-1. Flow Schematic: SFWMD R240A "Best Buy" Option



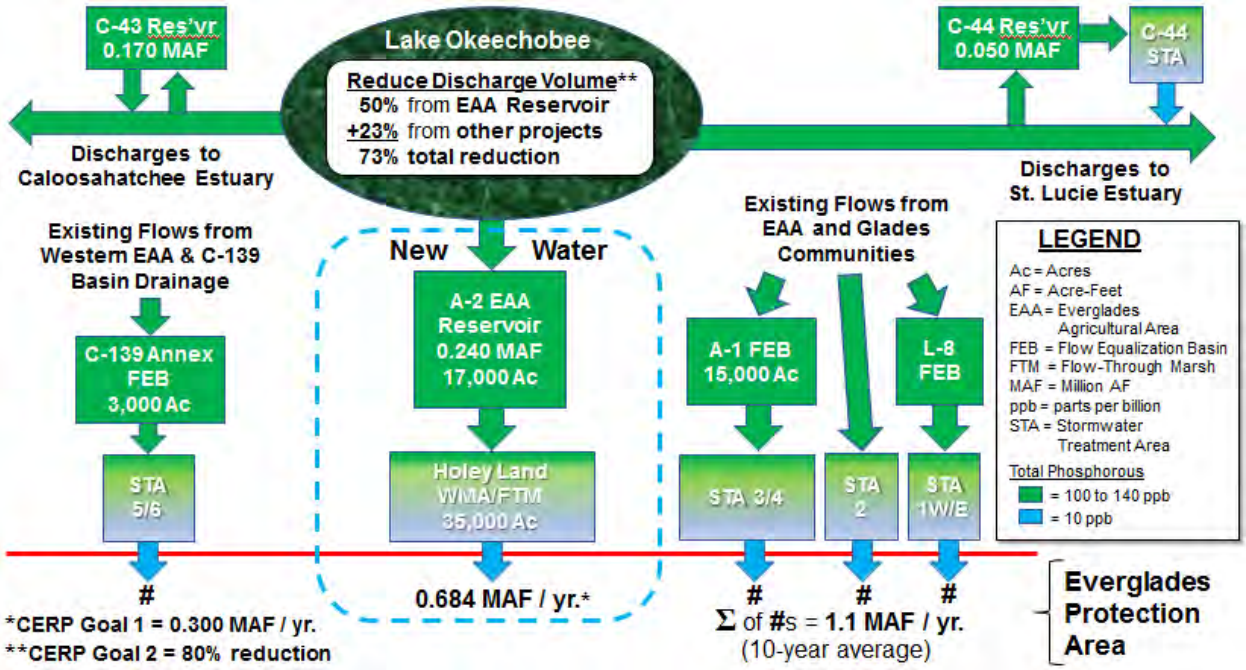
FS-2. Flow Schematic: SFWMD C360C "Best Buy" Option



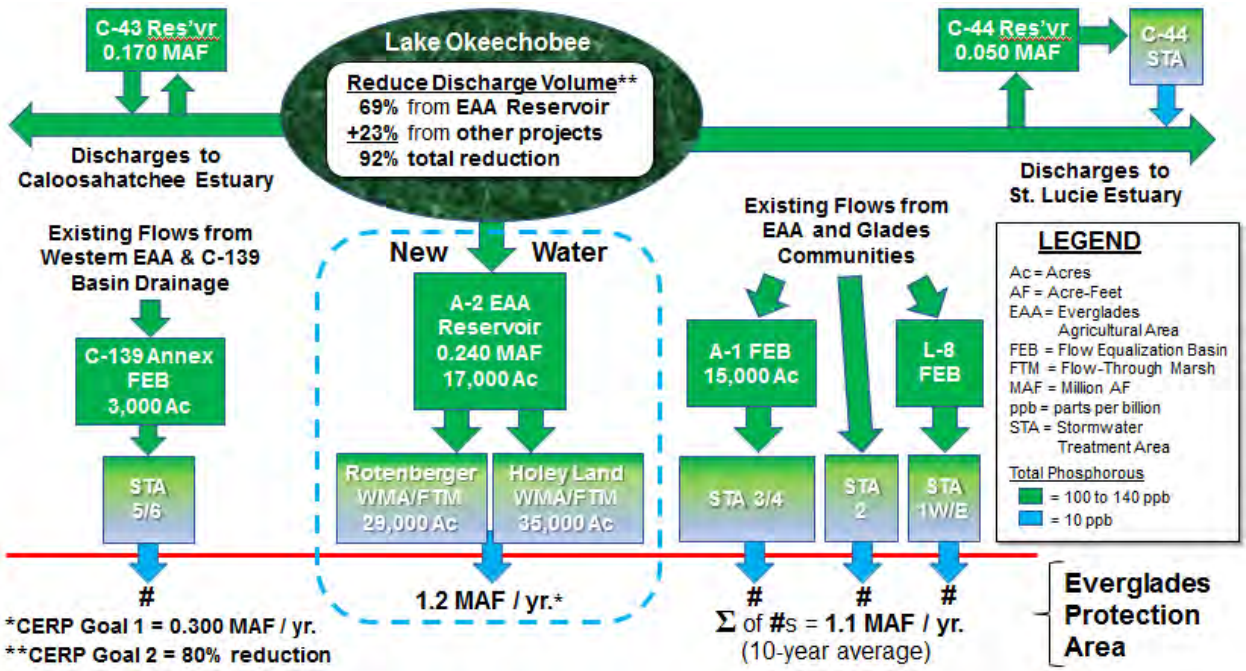
FS-3A. Flow Schematic: Everglades Foundation Option, STA unidentified



FS-3B. Flow Schematic: Modified Everglades Foundation Option, STA identified



FS-4. Flow Schematic: Hybrid R240 H1 Option



FS-5. Flow Schematic: Hybrid R240 H2 Option

Appendix B. Model Variable Descriptions and Calculation Formulas

Model Variables (bracketed numbers correspond to columns in **Table 1**)

RES is shorthand for reservoir

RES_{Acres} [3] is Acreage footprint of reservoir

RES_{EAC} [10] is Reservoir Effective Annual Capacity, which is the amount of additional water in one year that will flow out of the reservoir flow through the STAs and flow into the Everglades Protection Area.

RES_{FTC} [9] is Reservoir Flow Through Cycles per year, which is = STA_{NSC} x STA_{FTC} / RES_{NSC}

RES_{NSC} [2] is Reservoir Nominal Storage Capacity, and for the EAA Reservoir project specified in law as either 240,000 ac-ft or 360,000 ac-ft (Florida Statutes 373.4598 (5)(a), (5)(c) (a.k.a. Senate Bill 10)

STA is shorthand for stormwater treatment areas.

STA_{Acres} [5] is Acres of STAs

STA_{Depth} is Depth of STAs, which average about 1.5 feet over the course of a year, and at a maximum are 4 feet deep

STA_{FTC} is STA Flow Through Cycles per year; it is RES_{EAC} [10] ÷ (STA_{Acres} [5] x STA_{Depth}); when divided into 365 days quotient is STA_{FTdays}

STA_{FTdays} [8] is STA Flow Through in days

STA_{NSC} is STA Nominal Storage Capacity, which is the product of STA_{Acres} and STA_{Depth}

Calculation Formulas (bracketed numbers correspond to columns in **Table 1**)

[5] Although not done in this analysis, it is possible to use the model to calculate the quantity of STA Acres that would meet the CERP Goal of 300,000 ac-ft/yr additional flow from the EAA Reservoir/ STA system (or another goal), using STA_{FTdays} [8] as a "forcing" variable

[5] STA_{Acres} = RES_{FTC} [9] ÷ (365 ÷ STA_{FTdays} [8]) RES_{NSC} [2] ÷ STA_{Depth}

where

STA_{Depth} is 1.5 feet and STA_{FTdays} is 28 days, or

STA_{Depth} is 4 feet and STA_{FTdays} is 76 days

[6] STA_{NSC} = STA_{Acres} [5] x STA_{Depth}

where

STA_{Depth} is 1.5 feet, or

STA_{Depth} is 4 feet

[7] Total Acres = RES_{Acres} [3] + STA_{Acres} [5]

[8] STA Flow Through in days

- for the three current options (SFWMD and EF) this is calculated using RES_{EAC} [10] as a "forcing" variable:

  [8] STA_{FTdays} = 365 days/yr ÷ (RES_{EAC} [10] ÷ (STA_{Acres} [5] x STA_{Depth}))

  where

  RES_{EAC} [10] = 300,000 ac-ft/yr for SFWMD options or 340,000 ac-ft/yr for EF option and STA_{Depth} is either 1.5 feet or 4 feet

- for the two hybrid options it is calculated from performance of the entire 57,000 acre EAA STA system, which treated an average 1.1 million ac-ft/yr over the past ten years (derived from figure on p. 5B-10 in SFWMD's 2017 South Florida Environmental Report)

  therefore

  [8] STA_{FTdays} when STA_{Depth} is 1.5 feet = 365 days/yr ÷ (1,100,000 ac-ft/yr ÷ (57,000 ac x 1.5 ft) = 28 days

  [8] STA_{FTdays} when STA_{Depth} is 4 feet = 365 days/yr ÷ (1,100,000 ac-ft/yr ÷ (57,000 ac x 4 ft) = 76 days

[9] RES_{FTC} is Reservoir Flow Through Cycles

- for current options (SFWMD and EF options)

  [9] RES_{FTC} = RES_{EAC} [10] ÷ RES_{NSC} [2]

- for hybrid options RES_{FTC} is calculated using STA_{FTdays} [8] for the entire EAA STA system as a "forcing" variable (either 28 days at 1.5 foot STA depth, or 76 days at 4 foot depth)

  [9] RES_{FTC} = (STA_{NSC} [6] x (365 days/yr ÷ STA_{FTdays} [8])) ÷ RES_{NSC} [2]

[10] RES_{EAC} is Reservoir Effective Annual Capacity

- For SFWMD current options RES_{EAC} is given by SFWMD modelling as the CERP Goal 1 of 300,000 ac-ft/yr

- For EF current option RES_{EAC} is given by EF modelling as 340,000 ac-ft/yr

- For hybrid options RES_{EAC} is calculated using STA_{FTdays} [8] for the entire EAA STA system as a "forcing" variable (28 days at 1.5 foot STA depth; 76 days at 4 foot depth)

  [10] RES_{EAC} = RES_{NSC} [2] x RES_{FTC} [9]

  = STA_{NSC} [6] x (365 days/yr ÷ STA_{FTdays} [8])

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From: John Lumley
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Reservoir planning
Date: Thursday, April 19, 2018 9:59:10 AM

Hello Stacie,

Lets do the math. How many cubic feet of dirt will be dug out of the 10,100 acre by 23 feet deep?

Are you going to sell the dirt to pay for the machinery and labor to dig this big hole?

The past price for a situation like this is fifty cents .50 cents per yard paid to the land owner and the excavation company
comes, digs, takes the dirt and pays the owner. Check with Clyde Dawson at Indiantown, FL as he has done this with the State for
new highway construction fill.

However, the real solution is to let the water flow South to the Florida Bay the way Nature made it.

Open a channel South of the lake to allow water to flow South.

It appears that the Sugar Companies have tremendous political sway in Washington due to their large donations and Lobbyists.

Big sugar, Big money= Everglades and Mother Nature suffers.

The Big Sugar is paying for prime time ads regarding their NON pollution of the water which is hard to believe with the crop spraying and
chemicals applied as fertilizeres, etc. I fly for a living and have to deal with the HUGE clouds of smoke while they burn the sugar cane and
other growing lands. You have to see to believe.

Big sugar blames the property owners that are in Orlando and along the Kissimmee River for the pollution they are spewing off their farmland.

Somebody needs to fight for the Everglades and restore the natural flow of water to Florida Bay.

Sincerely,

John Lumley
Delray Beach, FL

From: Just
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Lake Okechobee water
Date: Wednesday, April 18, 2018 3:57:07 PM

The real solution is Emminent Domain by the state and open a corridor for Lake O water to head to Florida bay as it did in the past.

The sugar and agricultural companies have blocked the natural flow to Florida Bay from Lake O.

I invite u to come and fly with me and look at the problem from the air. Free. I have a flight school and fly over the area constantly.

The Corps of Engineers has a history of BAD
Plans including the Kissimmee River debacle of years past. Open up a path to Florida Bay as it is a logical solution.

I imagine Palm Beach Commissioners or other political hacks own the land u want to put the reservoir on! Lots of MONEY to be made from selling the fill dug out for the reservoir as well. More of the same.

DO IT RIGHT THIS TIME. Restore the water flow to Florida bay.

Sincerely,
John Lumley

Sent from my iPhone

From: Sullivan, Joseph(FHWA)
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] SFWMD CERP mod study
Date: Wednesday, April 25, 2018 4:26:44 PM

Hi Stacie,

I do not have a comment at this time, as I have not reviewed the documents yet, but would like to ensure that I am included on future mailings (either email or paper).

Thanks.

Take care,

Joe

Joseph P. Sullivan

Environmental Specialist

Federal Highway Administration

3500 Financial Plaza, Suite 400

Tallahassee, FL 32312

850-553-2248

Joseph.Sullivan@dot.gov

From: Kellie Ralston
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] USACE EAA Reservoir EIS Scoping Comment Letter
Date: Monday, April 30, 2018 6:04:08 PM
Attachments: USACE EAA EIS Scoping Comment Letter.pdf

Stacie-

Attached, please find our comment letter in support of the EAA Reservoir. Please let me know if you have any questions. Thank you!

Kellie Ralston

Florida Fisheries Policy Director

Keep Florida Fishing

American Sportfishing Association

9167 Shoal Creek Drive

Tallahassee, FL 32312

(904) 553-3733

kralston@asafishing.org <mailto:kralston@asafishing.org>

Blockedwww.asafishing.org <Blockedhttp://www.asafishing.org/>

April 30, 2017

Stacie Auvenshine
U.S. Army Corps of Engineers Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019

Dear Ms. Auvenshine:

The American Sportfishing Association (ASA) appreciates the opportunity to provide comments on the Everglades Agricultural Area Storage (EAA) Reservoir project. ASA is the nation's recreational fishing trade association and represents sportfishing manufacturers, retailers, wholesalers, and angler advocacy groups, as well as the interests of America's 46 million recreational anglers, over 3 million of whom reside in or frequent Florida. ASA also safeguards and promotes the social, economic, and conservation values of sportfishing in America, which result in a $115 billion per year impact on the nation's economy. In Florida, the Fishing Capital of the World, this translates to a significant $9.6 billion economic engine supporting over 128,000 jobs and makes clean waters and abundant fisheries in the State of paramount importance to our industry.

As a result, we are committed to comprehensive Everglades restoration efforts and support expediting related projects whenever possible. Restoring the southerly flow of clean water from Lake Okeechobee (Lake) to Florida Bay (Bay) is critical to reducing the frequency and volume of releases to the Caloosahatchee and St. Lucie Rivers as well as to maintaining proper salinity and water quality conditions in the Bay. Once completed, restoration will mitigate the associated detrimental environmental impacts these systems currently experience from altered flows.

Providing water storage south of the Lake through the EAA Reservoir is an important component of the Comprehensive Everglades Restoration Plan (CERP). Expediting the completion of this project in conjunction with the Central Everglades Planning Project will increase southern water flow and reduce the need for and the duration of releases to the northern estuaries.

As you prepare the Environmental Impact Statement (EIS) for the reservoir, we urge your swift and favorable consideration of the project and its significant positive effects to the overall system. ASA supports the design submitted by the South Florida Water Management District, which provides maximum benefits within the allowable footprint. Moving forward with this project quickly will allow for its timely inclusion in the anticipated Water and Resources Development Act anticipated this Congress and prevent further harm to the environment and our community.

ASA appreciates your consideration of our comments and looks forward to final approval of the EAA Reservoir by the USACE.

Thank you for your consideration.

Sincerely,

Kellie Ralston

Kellie Ralston
Florida Fisheries Policy Director

From: LIN CHILDRESS
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc: Howard Snoweiss
Subject: [Non-DoD Source] Reservoir to help cut Lake Okeechobee discharges
Date: Monday, April 23, 2018 2:41:53 PM

To whom it may be concerned: We are adamantly in favor of building the reservoir south of Lake Okeechobee in order to reduce lake discharges into the St. Lucie River and the Caloosahatchee River. Such discharges are destroying our esturary along with all of the wildlife, destroying waterfront homes, jobs, etc. We ask for your support for this project to start and be completed as soon as possible. Thanks very much. Sincerely, Linwood L. Childress and Howard Snoweiss, 2920 S.E. Dune Drive, Apt. 130, Stuart, Fl. 34996.

From: mary shabbott
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Protect what little Florida has left
Date: Monday, April 23, 2018 4:48:53 PM

Stacie Auvenshine,
I am writing to support the Army Corp of Engineers' efforts to protect Florida's environment from the harmful pollutants in Okeechobee Lake discharges:

23-foot-deep, 10,100-acre reservoir to store up to 78.2 billion gallons of excess lake water
6,500-acre man-made marsh to clean the water
When used in conjunction with other existing and planned projects, I believe this will reduce the number of damaging discharge events from Lake Okeechobee to the St. Lucie and Caloosahatchee rivers by 63 percent and send an average of about 120.6 billion gallons of clean water south to the Everglades and Florida Bay.
Respectfully,
Mary Shabbott

From:	Michael Baldwin
To:	Auvenshine, Stacie J CIV USARMY CESAJ (US)
Cc:	Kirk, Jason A COL USARMY CESAJ (US); Reynolds, Jennifer A LTC USARMY CESAJ (US); Taplin, Kimberley A CIV USARMY CESAJ (US); Paul Tritaik; Jim Metzler; Sarah Ashton; Birgie Miller
Subject:	[Non-DoD Source] Environmental Review of State"s EAA Reservoir Study
Date:	Saturday, April 28, 2018 1:30:16 PM
Attachments:	Auvenshine 04-25-18.pdf

Dear. Ms. Avenshine – the attached letter is submitted as a comment from the "Ding" Darling Wildlife Society – Friends of the J. N. "Ding" Darling National Wildlife Refuge on the subject study,

M J Baldwin

Michael J. Baldwin, PhD

President

"Ding" Darling Wildlife Society

Phone: 239-472-8997

Cell: 239-410-7931

E-Mail: drmikeb@comcast.net <mailto:drmikeb@comcast.net>

"DING" DARLING WILDLIFE SOCIETY
SANIBEL FLORIDA
Friends of the Refuge

1 Wildlife Drive, P.O. Box 565, Sanibel, FL • tel (239) 472-1100 • fax (239) 472-7803 • www.dingdarlingsociety.org

April 25, 2018

Ms. Stacie Auvenshine
U.S. Army Corps of Engineers, Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019

Dear Ms. Auvenshine:

This letter is in response to the Corps' call for comments on its environmental review of the South Florida Water Management District's Everglades Agricultural Area (EAA) storage reservoir study. Water quality is critical not only for the Ding Darling Wildlife Refuge, but also for all of south Florida. As highlighted by Congressman Francis Rooney, "The Lake Okeechobee Watershed and Everglades have far-ranging impact on the entire State of Florida and the country, but especially in Southeast and Southwest Florida, where 55% of all real estate in the state is affected - 2 trillion dollars of economic impact across 164 cities and 16 counties."[1]

The Ding Darling Wildlife Society (DDWS) recognizes the fact that there may be limited objections to the South Florida Water Management District's study as there is always more that could be done. However, we believe that the implementation of the recommendations in the study will significantly improve the water quality in South Florida and as such, we strongly support that they be implemented in as timely a manner as possible.

Sincerely yours,

(Signed)

Michael J. Baldwin, President

Cc: Lt. Col. Jennifer Reynolds, ACoE
Col. Jason Kirk, ACoE
Kim Taplin, ACoE
Paul Tritaik, DDNWR
Jim Metzler/Sarah Ashton, DDWS
Birgie Miller, DDWS

[1] https://francisrooney.house.gov/news/documentsingle.aspx?DocumentID=331

From: Micheal Conner
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] EAA reservoir effectiveness
Date: Wednesday, April 18, 2018 8:39:54 AM

Hello Stacie,

I appreciate the opportunity to provide comment on the standing plan for the EAA reservoir.

I feel that the project as is will not provide the needed relief from Lake Okeechobee discharges to either the St. Lucie River or the Caloosahatchee River. A 50 to 60 percent reduction is not going to spare these failing estuaries. I live in Stuart and the damage wrought by the past three or four discharge events have killed too much grass and marine organisms, and the public health threat is unacceptable.

The amount of water that the EAA project will send south to Florida Bay is inadequate as well. Specifically, the project footprint does not allow for enough water cleansing. A 24 foot deep reservoir is not what we envisioned. The A2 and A1 land will not get this job done. The SFWMD did not put enough effort into acquiring land, as was directed by Senate Bill 10.

As I understand it, during dry times, the agricultural industry will be granted the right to tap the EAA reservoir for irrigation. That is ludicrous. The sugar industry fought against this project tooth and nail. They should not be given a drop of that water.

I am disappointed that we must wait 8 or more years for something that won't do the job.

Thanks,

Capt. Mike Conner
Stuart, FL
772-521-1882

Sent from my iPad

From: Mike D Brown
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Lake O reservoir
Date: Wednesday, April 18, 2018 7:56:09 AM

I want you to stop sending Lake O waters into the IRL and into the Gulf and never send it there again. I want you to send lake O water through marshes to clean contaminants out of the water and down into the Everglades. I want you to begin doing this as quickly as possible. Thank you.

Mike D Brown
mojomikebrown@aol.com

From: Patricia Noonan
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Reservoir plan
Date: Wednesday, April 18, 2018 8:30:51 AM

Good morning,

Even though it is not enough to clean up the water that surrounds our homes here, I want to voice my support for the reservoir plan. We still will get discharges into the St. Lucie River, the oysters will still die and have to be reintroduced regularly, and we still will get warnings to stay out of the water in certain areas. But it is a start and something that we can build upon in the future.

Thank you,

Patricia Noonan

Patricia S. Noonan
6401 SE Inlet Way
Stuart, FL 34996
772.225.1520
cell 914.393.9133

From my iPad

From: rich magoo
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Lake Okeechobee Time To Use Some COMMON SENSE 4/30/2018
Date: Monday, April 30, 2018 6:17:19 PM

COMMON SENSE Tells US that the Solutions are not Too Difficult i.e. Lake Okeechobee is polluting the ST. Lucie and Caloosahatchee Estuaries. This Polluted Water is going to end up in the Atlantic Ocean anyway, So Why not build a Pipeline from the C-44 Canal to the ocean and send the polluted water to the ocean . If this water is Dispensed through a Christmas tree it will be Cooled and at Specific Gravity Of 1.0 will rise to the top while mixing with the 1.2 Specific Gravity ocean water. This will help in the Global Warming Problem. New York City Dumps their Garbage in the Ocean, and the Amazon River dumps at least 5 Lake O's everyday in the Ocean, so EPA should not be a Problem. As For Cleaning the Water Going to the Everglades. Lake Okeechobee is one of the Bigger Filters in the World. And Though Everyone CLEANS or Replaces Their Air Conditioner Filter, Replaces their Refridgerators/ Feezer Water Filter for Ice cubes and Drinking Water, And replaces Vacuum Cleaner Filter. NO ONE EVER CLEANS THE LAKE OKEECHOBEE FILTER. The Solution Could Be: Get One or Two Of The Humongous Fertilizer Companies To Filter All The Water Leaving Lake Okeechobee. While Doing this You Could use Maybe 4 SOLAR POWERED GPS CONTROLLED BARGES with several Propellers To Stir up The Phosphorous Sediment, and direct it South. every day 24/7 There would be less Sediment Collected until finally the Fertilizer Companies will go home. and Everyone lived Happily Ever After.

dupolin@yahoo.com

Thank You,

RICHARD C. MCGEOUGH
573 SW CARTER AVE.
PORT SAINT LUCIE,FL 34983-2983

From: Richard Persson
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Reservoir
Date: Monday, April 16, 2018 12:06:14 PM

Important consideration should be given to the sportsmen in the reservoir. A littoral area should be included in the plans in order for fish to spawn, and a boat ramp should be included in any plans. Any reservoir can serve a dual purpose such as water storage, and a good sustainable fishery can be maintained. This will also bring a boost to the economy in the area. Richard Persson Past Vice President, South Florida Anglers for Everglades Restoration.

Sent from Yahoo Mail on Android <Blockedhttps://go.onelink.me/107872968?pid=InProduct&c=Global_Internal_YGrowth_AndroidEmailSig__AndroidUsers&af_wl=ym&af_sub1=Internal&af_sub2=Global_YGrowth&af_sub3=EmailSignature>

From: Robert Gibbons
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Reservoir should be at least TWICE as large & deeper than currently proposed. We need the discharges stopped 100%, except for emergencies after Hurricanes.
Date: Wednesday, April 18, 2018 8:42:32 AM

There are many more businesses and livelihoods at risk on both coasts than are employed in the Everglades Agri-Area.

I recommend relocating farming families who may be impacted and assisting them with new job training, etc.

Sincerely,

Robert Gibbons

Stuart, FL 34997

Sent from Mail <Blockedhttps://go.microsoft.com/fwlink/?LinkId=550986> for Windows 10

From: Scott, W Ray
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] EAA Storage PACR Scoping Comments
Date: Tuesday, May 01, 2018 9:48:46 AM
Attachments: EAA Storage PACR Scoping Comments submitted 05012018.pdf

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Please find attached FDACS comments re:

South Florida Water Management Section 203 Tentatively Selected Plan for a Post Authorization Change Report to modify the Central Everglades Planning Project features specific to the New Water Project Partnership Agreement – U.S. Army Corps of Engineers Environmental Impact Statement Scoping Comments

Thank you for the opportunity to provide comments.

W. Ray Scott

Deputy Director

Office of Agricultural Water Policy

Florida Department of Agriculture and Consumer Services

850-617-1716

850-617-1701 Fax

850-544-9871 Cell

Ray.Scott@FreshFromFlorida.com <mailto:Ray.Scott@FreshFromFlorida.com>

Physical Address:

The Elliot Building

401 South Monroe

Tallahassee, Florida 32399

Mailing Address:

The Mayo Building

407 South Calhoun Street, Mail Stop E1

Tallahassee, Florida 32399-0800

Blockedwww.floridaagwaterpolicy.com <Blockedhttp://www.floridaagwaterpolicy.com/>

OFFICE OF AGRICULTURAL WATER POLICY
(850) 617-1700

THE MAYO BUILDING
407 SOUTH CALHOUN STREET
TALLAHASSEE, FLORIDA 32399-0800

FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES

COMMISSIONER ADAM H. PUTNAM

May 1, 2018

Ms. Gina Paduano Ralph
Chief, Environmental Branch
Department of the Army
Jacksonville District Corps of Engineers
701 San Marco Boulevard
Jacksonville, Florida 32207-0019

RE: South Florida Water Management Section 203 Tentatively Selected Plan for a Post Authorization Change Report to modify the Central Everglades Planning Project features specific to the New Water Project Partnership Agreement – U.S. Army Corps of Engineers Environmental Impact Statement Scoping Comments

Dear Ms. Ralph:

The Florida Department of Agriculture and Consumer Services (FDACS) appreciates the opportunity to provide comments on the Environmental Impact Statement (EIS) the United States Corps of Engineers (USACE) is preparing in accordance with the National Environmental Policy Act (NEPA) on the South Florida Water Management (SFWMD) Section 203 Tentatively Selected Plan (TSP) for a Post Authorization Change Report (PACR) to modify the Central Everglades Planning Project (CEPP) features specific to the New Water Project Partnership Agreement (PPA). We are submitting the following comments for consideration.

Our review focused on aspects of the SFWMD CEPP New Water PPA PACR which may impact private agricultural lands and agricultural operations. The comments provided are specific to the topics addressed below and do not constitute a review of the entire PACR and its supporting appendices.

1) Water Supply. We are pleased to see the significant reduction in water shortage cutbacks shown in the PACR through use of the EAA reservoir to meet irrigation needs in the service area. The Corps needs to be explicit in making this operational requirement a formal part of the operation manual section associated with the reservoir.

Gina Ralph
May 1, 2018
Page Two

2) Flood Protection. Agricultural flood protection is another major concern for FDACS. Based on a quick review of the model output readily available, it appears that the current level of service will be maintained. The EAA reservoir project in the 1999 plan approved by Congress was one of only two projects that included the enhancement of flood protection as a project purpose. The conveyance enhancements in this plan coupled with the new inflow pump station for the reservoir would allow some enhancement to be achieved through purely operational means and it would seem this should be part of the analysis. The ability to reduce peak stage in both the Miami and North New River Canals could greatly reduce the need for flood control pumping at S-2 and S-3 while providing improved flood protection for the farms and cities near the lake

3) Schedule. The schedule shown in the PACR needs to convey a realistic time frame in keeping with the constrained schedule provided in the CEPP report and the actual federal funds that have been made available for Comprehensive Everglades Restoration Plan (CERP) projects since.

4) Project Dependencies. The project dependencies and sequencing of CEPP and non-CEPP projects is a major concern for FDACS since the success of all projects without negative impacts to both developed and undeveloped lands relies on proper sequencing to address water quality, construction prerequisites, operational options, and seepage control. Based on our review, it is not clear to us that the carefully thought out sequencing included in CEPP has been followed.

5) Operational Changes Available Under Existing CERP. Several areas show improved environmental performance that seems to be related to operational changes that are not dependent on changes to the size of the A-2 reservoir. It specifically mentions changes to the upper bands of the Lake Okeechobee schedule and modifications to south Dade operations to achieve more benefits for Florida Bay. These changes, and potentially others, that are not dependent on the additional storage in A-2 should be included in the EIS analysis so it is clear that all the outcomes shown in the PACR are not related solely to the additional storage being proposed and are available under the existing CERP authorization.

Gina Ralph
May 1, 2018
Page Three

FDACS appreciates the opportunity to provide scoping comments. We look forward to continued progress on CERP projects and working with our state and federal partners to improve system-wide capabilities. If you have any questions regarding FDACS' comments, please contact Ray Scott at (850) 617-1716 or Rebecca Elliott at (561) 682-6040.

Sincerely,

W. Ray Scott
Deputy Director
Office of Agricultural Water Policy

From: Sharon Smith Purdy
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Lake O Discharge
Date: Sunday, April 22, 2018 7:02:10 PM

Ms. Auvenshine,

Please, please, please, approve the plan to change the runoff from Lake O....there are so many negative, environmental impacts occurring with current status quo. All who have the influence and power to make a change must make that change happen now!
Please be part of the solution.
Happy Earth Day...May we all learn to better respect this planet....

Sharon Smith Purdy
Age 66 and finally getting in tune with our environment.

Sharon Smith Purdy
508-962-1300

From: Shaun G. MacKenzie, P.E.
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] CERP Comment
Date: Wednesday, April 18, 2018 9:19:11 AM

I support the proposed project.

Shaun G. MacKenzie

Palm City, FL 34990

From: Shirley Harris
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Florida Dike
Date: Wednesday, April 18, 2018 1:27:03 PM

I think you should NEVER have built the dike in the first place. It has caused problems for years and now people live all around Lake Okeechobee. You have created a monster problem and now want money to fix it. You should take the funds to fix your problems out of your budget.

Shirley M. Harris

Well-behaved women seldom make history.

From: Treble Hook
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Everglades Agricultural Area Best I can explain....
Date: Monday, April 16, 2018 10:28:25 PM

Welcome to Florida! Watch out for deadly sharks, snakes, and Gators. Know worries! Most of the Florida Black Bears, and most all of the Panthers have been forever lost to uncontrolled Devil-lopers and greased poly-contritions. And that's just the tip of the wastewater treatment pond they call the 4th largest lake in the USA,
LAKE OCHEECHOBEE!

" cast-a-line let your Florida S¤UL Shine!..."

Treble Hook Scott Rexroat 727-418-2918

The TREBLE HOoks Facebook! <Blockedhttp://www.facebook.com/thetreblehooks>

From: WILLIAM LAIN
To: Auvenshine, Stacie J CIV USARMY CESAJ (US)
Subject: [Non-DoD Source] Reservoir
Date: Wednesday, April 18, 2018 10:44:34 AM

I view the proposed reservoir as a very positive step in the right direction. It is not a complete perfect solution but it appears to be a substantial part of one. History shows it may not be best to effect what we think is a perfect solution all at once anyway. We once thought draining Okeechobee through the Saint Lucie and Caloosahatchee was a great idea. Given where we are now the proposed reservoir appears to be a very good experiment. Bill Lain, 9750 Riverview Dr. Micco, Fl 32976

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-0019

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

MAY 23 2018

Mr. Fred Dayhoff, Tribal Representative
NAGPRA, Section 106
Miccosukee Tribe of Indians of Florida
HC 61 SR 68
Ochopee, Florida 34141

Re: South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment Area (STA)

Dear Mr. Dayhoff:

The U.S. Army Corps of Engineers, Jacksonville District (Corps) is preparing National Environmental Policy Act (NEPA) documentation related to a feasibility study (study) prepared by SFWMD pursuant to Section 203(a)(1) of the Water Resources Development Act (WRDA) of 1986 (33 U.S.C. 2231(a)(1)), as amended. The SFWMD submitted its study on March 30, 2018 to the Assistant Secretary of the Army for Civil Works (ASA(CW)) for review in order to determine under 33 U.S.C. 2231(b) whether the study complies with Federal laws and regulations applicable to water resources development project feasibility studies . This SFWMD study, if authorized, would modify the Central Everglades Planning Project (CEPP), which was authorized as a Federal project by Congress in 2016. The SFWMD study proposes modifications to CEPP features specific to the New Water Project.

The Federal action of the ASA(CW) is to evaluate and report whether the project is feasible and provide any recommendations concerning the project design or conditions for construction to several congressional committees. Under Section 203 guidance, the Corps is not involved in a non-Federal Interest's development of alternatives but may provide technical assistance at the non-Federal Interest's expense (in this case SFWMD is the non-Federal Interest). The National Historic Preservation Act (NHPA), NEPA, and other relevant environmental laws, statutes, and executive orders apply to the federal action in response to the submittal of the feasibility study. Therefore, the Corps is preparing an Environmental Impact Statement (EIS) in accordance with NEPA to evaluate and document effects on the human environment of the SFWMD Section 203 Study Locally Preferred Alternative compared to the No Action Alternative, which is the currently authorized CEPP project, and conduct consultation under Section 106 of the NHPA.

The currently authorized CEPP Recommended Plan stores, treats, and redirects approximately 210,000 acre-feet of water on an average annual basis to the historical Everglades ecosystem in lieu of releasing the excess water from Lake Okeechobee through the St. Lucie Canal (east) and the Caloosahatchee Canal (west) to the coastal estuaries (referred to as the Northern Estuaries). The SFWMD Section 203 study recommends changes to the CEPP New Water Project in response to Florida Law Chapter 2017-10 providing direction to SFWMD to expedite planning, design, and construction of improved conveyance, water storage and treatment in the EAA with a reservoir holding a minimum of 240,000 acre-feet. The SFWMD Section 203 Study Locally Preferred Alternative would increase CEPP flows to the central portion of the Everglades from an average annual of approximately 210,000 acre-feet to 370,000 acre-feet overall. Specific changes to the authorized CEPP project features considered in the Locally Preferred Alternative include adjusting from a 14,000 acre flow equalization basin (FEB) to a 10,500 acre, 23-feet deep water reservoir and the addition of a 6,500 acre storm water treatment area (STA) (Figures 1 and 2). Additional features of the study would add conveyance improvements to the Miami and North New River canals and construct new structures to route and discharge water. The effects of these changes are to be evaluated in the EIS and coordinated under Section 106 of the NHPA. SFWMD's proposed modifications to CEPP would require Congressional authorization.

The area of potential effects (APE) for cultural resources in the SFWMD Section 203 Study Locally Preferred Alternative measures approximately 34,500 acres, and is comprised of the A-1 and A-2 parcels, portion of the A-2 Expansion area, portions of the Miami Canal, and portions of the North New River Canal. Three cultural resources surveys have been conducted for approximately 30,000 acres of the APE and are documented in the 2016 report produced by Southeastern Archaeological Research, Inc. (SEARCH) titled *Archaeological Identification and Evaluation of the Miami and North New River Canals and a Phase I Survey in the Everglades Agricultural Area, Palm Beach County, Florida* (Austin 2016); the 2013 SEARCH report titled *Central Everglades Planning Project, Cultural Resources Investigation of Everglades Agricultural Area Cell A-2, Palm Beach County, Florida* (Austin 2013); and the 2012 report prepared by the Florida Bureau of Archaeological Research titled *A Cultural Resource Assessment Survey of the EAA A-1 Property, Palm Beach County, Florida* (Seinfeld and Rothrock 2012) (see Figure 1). These investigations resulted in the identification of three historic properties evaluated as potentially eligible for listing in the National Register of Historic Places (NRHP); including the North New River (NNR) Canal, the Miami Canal, and prehistoric site 8PB16039. An additional archaeological site (8PB16040) was identified as a result of these surveys; however, more information will be required prior to determining the NRHP eligibility of the resource. These surveys and recommendations of NRHP eligibility were consulted with the Florida State Historic Preservation Officer (SHPO), the Seminole Tribe of Florida, the Miccosukee Tribe of Indians of Florida, and other interested parties on numerous occasions between 2011 and 2014 (DHR Project File Nos.: 2012-01115; 2012-2895; 2013-2375; 2013-4293; 2013-3571; 2013-4407; 2013-4408).

For purposes of cultural resources, the SFWMD Section 203 Study Locally Preferred Alternative effects minimal change relative to the currently authorized 2014 CEPP Recommended Plan. The proposed change enlarges the project footprint by approximately 4,500 acres. As coordinated during CEPP, the Corps will employ a phased process to identify and evaluate historic properties and assess effects. This approach will also be documented in the Corps' EIS in accordance with Section 106 of the NHPA (36 CFR § 800.4[b][2]).

Once the project has been authorized by Congress, each suite of features will be subject to separate consultation and consideration of effects during preconstruction engineering and design (PED) as the area of potential effects (APE) may be subject to change based on final designs or modifications of project features. Supplementary cultural resources assessments will be conducted in areas that have not been previously surveyed. During PED and prior to construction, these surveys and a final determination of effects for any historic properties within the APE will be coordinated with your office.

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and it's implementing regulations (36 CFR 800), and in consideration of the Corps' Trust Responsibilities to the Miccosukee Tribe of Indians of Florida, the Corps kindly requests continued consultation on this project. Please send any comments within 30 calendar days of receipt of this letter. If there are any questions, please contact Ms. Meredith Moreno at 904-232-1577 or e-mail at Meredith.a.moreno@usace.army.mil.

Sincerely,

Gina Paduano Ralph, Ph.D.
Chief, Environmental Branch

Enclosure

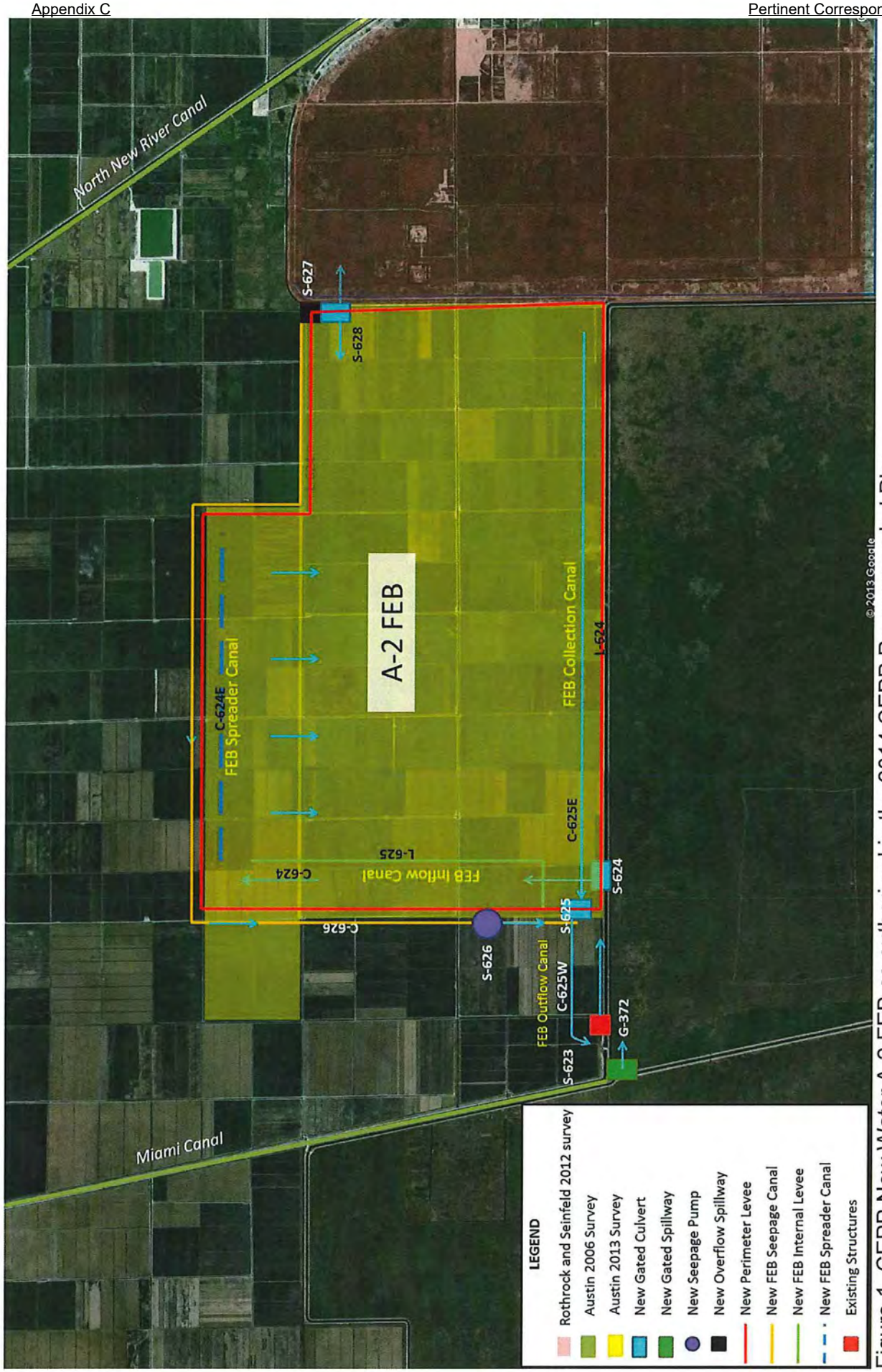

Figure 1. CEPP New Water A-2 FEB as authorized in the 2014 CEPP Recommended Plan.

Figure 2. Proposed Locally Preferred Alternative in the SFWMD Section 203 study.

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-0019

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

MAY 23 2018

Dr. Paul Backhouse, THPO
Seminole Tribe of Florida
Tribe Historic Preservation Office
30290 Josie Billie Highway
PMP 1004
Clewiston, FL 33440

Re: South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment Area (STA)

Dear Dr. Backhouse:

The U.S. Army Corps of Engineers, Jacksonville District (Corps) is preparing National Environmental Policy Act (NEPA) documentation related to a feasibility study (study) prepared by SFWMD pursuant to Section 203(a)(1) of the Water Resources Development Act (WRDA) of 1986 (33 U.S.C. 2231(a)(1)), as amended. The SFWMD submitted its study on March 30, 2018 to the Assistant Secretary of the Army for Civil Works (ASA(CW)) for review in order to determine under 33 U.S.C. 2231(b) whether the study complies with Federal laws and regulations applicable to water resources development project feasibility studies . This SFWMD study, if authorized, would modify the Central Everglades Planning Project (CEPP), which was authorized as a Federal project by Congress in 2016. The SFWMD study proposes modifications to CEPP features specific to the New Water Project.

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Sincerely,

Gina Paduano Ralph, Ph.D.
Chief, Environmental Branch

Enclosure

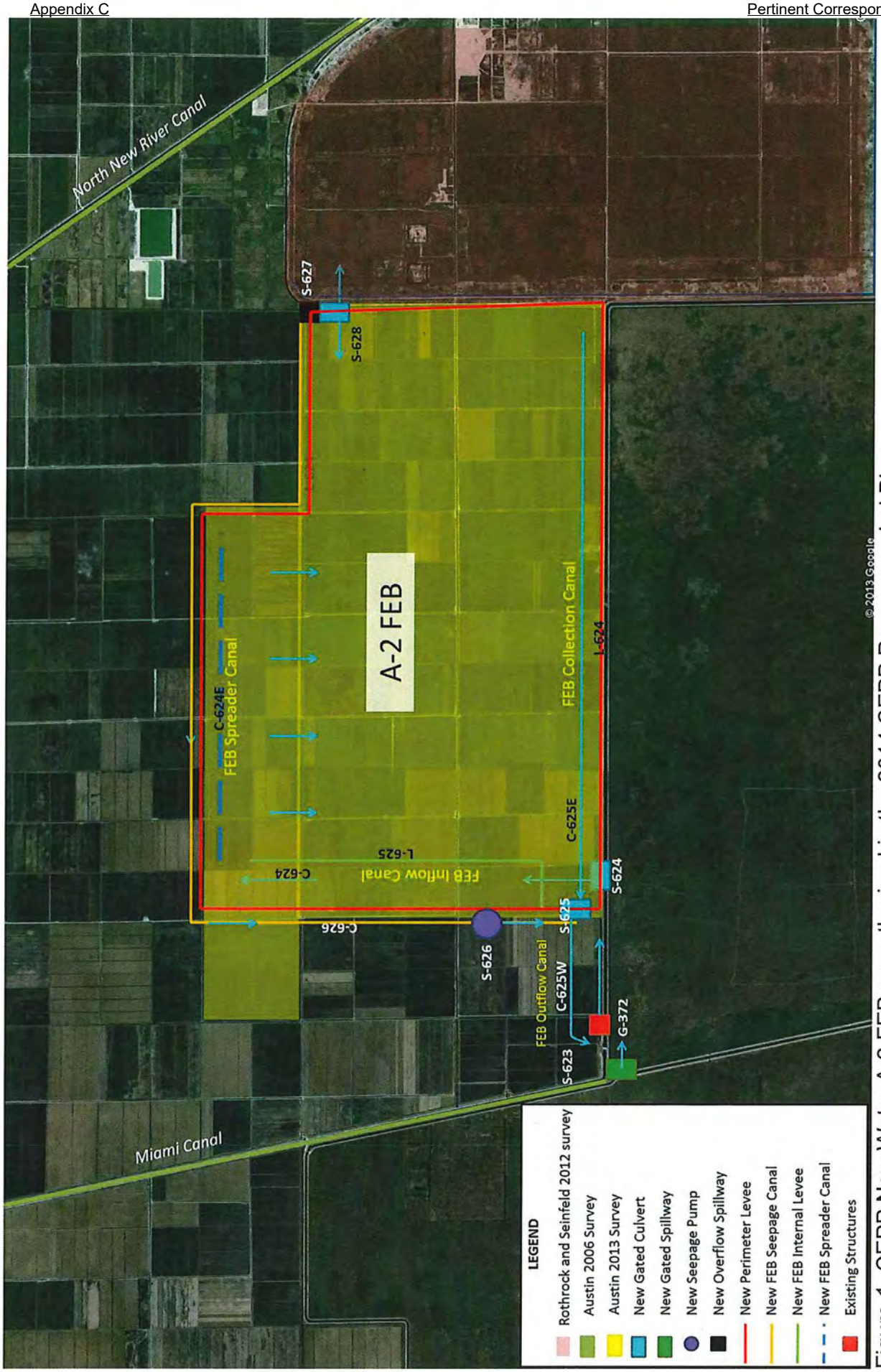

Figure 1. CEPP New Water A-2 FEB as authorized in the 2014 CEPP Recommended Plan.

Figure 2. Proposed Locally Preferred Alternative in the SFWMD Section 203 study.

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-0019

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

MAY 23 2018

Mr. Theodore Isham
Historic Preservation Officer
Seminole Nation of Oklahoma
PO Box 1498
Wewoka, Ok 74884

Re: South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment Area (STA)

Dear Mr. Isham:

The U.S. Army Corps of Engineers, Jacksonville District (Corps) is preparing National Environmental Policy Act (NEPA) documentation related to a feasibility study (study) prepared by SFWMD pursuant to Section 203(a)(1) of the Water Resources Development Act (WRDA) of 1986 (33 U.S.C. 2231(a)(1)), as amended. The SFWMD submitted its study on March 30, 2018 to the Assistant Secretary of the Army for Civil Works (ASA(CW)) for review in order to determine under 33 U.S.C. 2231(b) whether the study complies with Federal laws and regulations applicable to water resources development project feasibility studies . This SFWMD study, if authorized, would modify the Central Everglades Planning Project (CEPP), which was authorized as a Federal project by Congress in 2016. The SFWMD study proposes modifications to CEPP features specific to the New Water Project.

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The area of potential effects (APE) for cultural resources in the SFWMD Section 203 Study Locally Preferred Alternative measures approximately 34,500 acres, and is comprised of the A-1 and A-2 parcels, portion of the A-2 Expansion area, portions of the Miami Canal, and portions of the North New River Canal. Three cultural resources surveys have been conducted for approximately 30,000 acres of the APE and are documented in the 2016 report produced by Southeastern Archaeological Research, Inc. (SEARCH) titled *Archaeological Identification and Evaluation of the Miami and North New River Canals and a Phase I Survey in the Everglades Agricultural Area, Palm Beach County, Florida* (Austin 2016); the 2013 SEARCH report titled *Central Everglades Planning Project, Cultural Resources Investigation of Everglades Agricultural Area Cell A-2, Palm Beach County, Florida* (Austin 2013); and the 2012 report prepared by the Florida Bureau of Archaeological Research titled *A Cultural Resource Assessment Survey of the EAA A-1 Property, Palm Beach County, Florida* (Seinfeld and Rothrock 2012) (see Figure 1). These investigations resulted in the identification of three historic properties evaluated as potentially eligible for listing in the National Register of Historic Places (NRHP); including the North New River (NNR) Canal, the Miami Canal, and prehistoric site 8PB16039. An additional archaeological site (8PB16040) was identified as a result of these surveys; however, more information will be required prior to determining the NRHP eligibility of the resource. These surveys and recommendations of NRHP eligibility were consulted with the Florida State Historic Preservation Officer (SHPO), the Seminole Tribe of Florida, the Miccosukee Tribe of Indians of Florida, and other interested parties on numerous occasions between 2011 and 2014 (DHR Project File Nos.: 2012-01115; 2012-2895; 2013-2375; 2013-4293; 2013-3571; 2013-4407; 2013-4408).

For purposes of cultural resources, the SFWMD Section 203 Study Locally Preferred Alternative effects minimal change relative to the currently authorized 2014 CEPP Recommended Plan. The proposed change enlarges the project footprint by approximately 4,500 acres. As coordinated during CEPP, the Corps will employ a phased process to identify and evaluate historic properties and assess effects. This approach will also be documented in the Corps' EIS in accordance with Section 106 of the NHPA (36 CFR § 800.4[b][2]).

Once the project has been authorized by Congress, each suite of features will be subject to separate consultation and consideration of effects during preconstruction engineering and design (PED) as the area of potential effects (APE) may be subject to change based on final designs or modifications of project features. Supplementary cultural resources assessments will be conducted in areas that have not been previously surveyed. During PED and prior to construction, these surveys and a final determination of effects for any historic properties within the APE will be coordinated with your office.

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and it's implementing regulations (36 CFR 800), and in consideration of the Corps' Trust Responsibilities to the Seminole Nation of Oklahoma, the Corps kindly requests continued consultation on this project. Please send any comments within 30 calendar days of receipt of this letter. If there are any questions, please contact Ms. Meredith Moreno at 904-232-1577 or e-mail at Meredith.a.moreno@usace.army.mil.

Sincerely,

Gina Paduano Ralph, Ph.D.
Chief, Environmental Branch

Enclosure

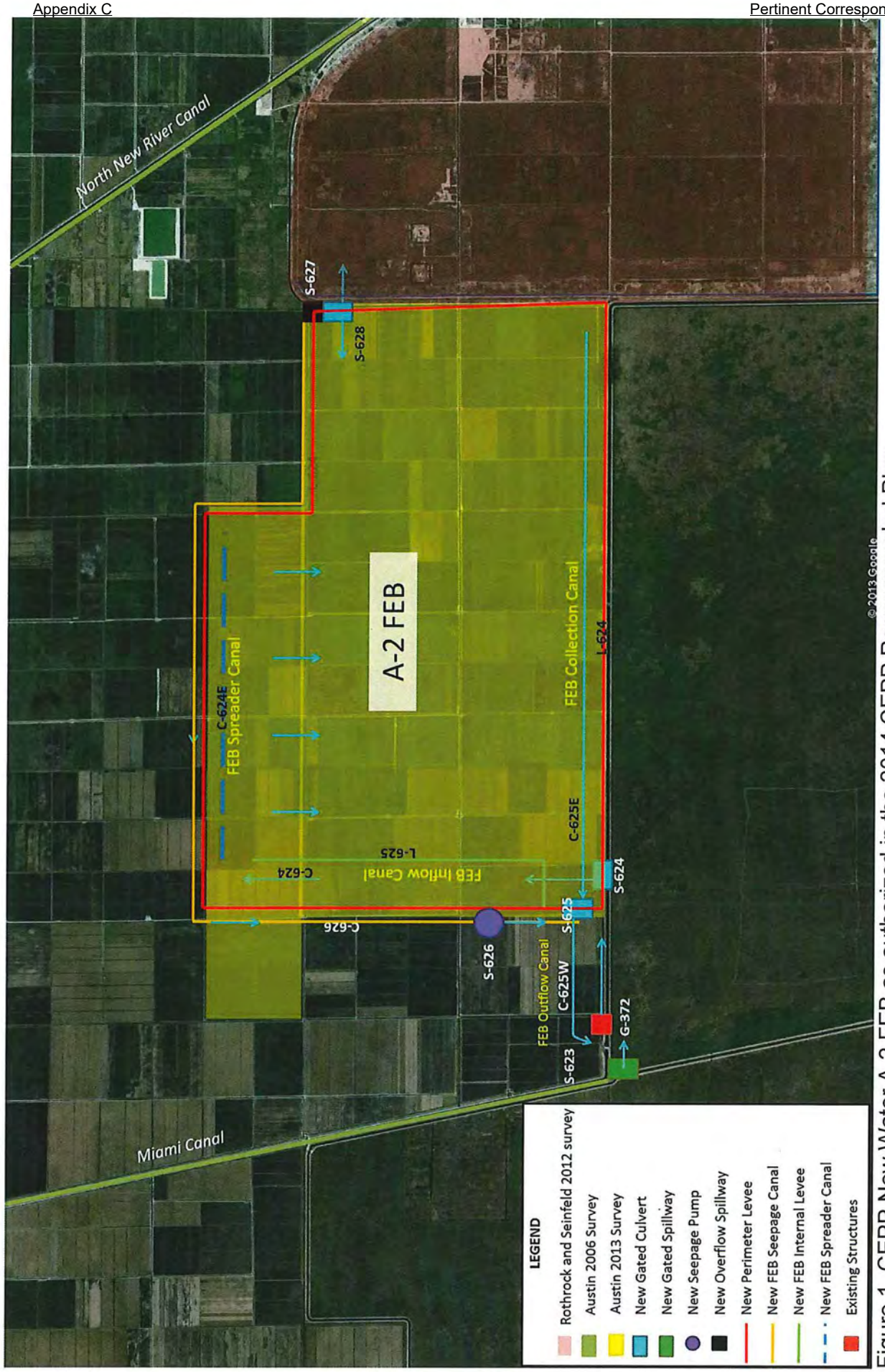

Figure 1. CEPP New Water A-2 FEB as authorized in the 2014 CEPP Recommended Plan.

Figure 2. Proposed Locally Preferred Alternative in the SFWMD Section 203 study.

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-0019

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

MAY 23 2018

Tim Parsons, Ph.D. SHPO
Division of Historical Resources
State Historic Preservation Officer
500 South Bronough Street
Tallahassee, Florida 32399-0250

Re: South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment Area (STA)

Dear Dr. Parsons:

The U.S. Army Corps of Engineers, Jacksonville District (Corps) is preparing National Environmental Policy Act (NEPA) documentation related to a feasibility study (study) prepared by SFWMD pursuant to Section 203(a)(1) of the Water Resources Development Act (WRDA) of 1986 (33 U.S.C. 2231(a)(1)), as amended. The SFWMD submitted its study on March 30, 2018 to the Assistant Secretary of the Army for Civil Works (ASA(CW)) for review in order to determine under 33 U.S.C. 2231(b) whether the study complies with Federal laws and regulations applicable to water resources development project feasibility studies . This SFWMD study, if authorized, would modify the Central Everglades Planning Project (CEPP), which was authorized as a Federal project by Congress in 2016. The SFWMD study proposes modifications to CEPP features specific to the New Water Project.

The Federal action of the ASA(CW) is to evaluate and report whether the project is feasible and provide any recommendations concerning the project design or conditions for construction to several congressional committees. Under Section 203 guidance, the Corps is not involved in a non-Federal Interest's development of alternatives but may provide technical assistance at the non-Federal Interest's expense (in this case SFWMD is the non-Federal Interest). The National Historic Preservation Act (NHPA), NEPA, and other relevant environmental laws, statutes, and executive orders apply to the federal action in response to the submittal of the feasibility study. Therefore, the Corps is preparing an Environmental Impact Statement (EIS) in accordance with NEPA to evaluate and document effects on the human environment of the SFWMD Section 203 Study Locally Preferred Alternative compared to the No Action Alternative, which is the currently authorized CEPP project, and conduct consultation under Section 106 of the NHPA.

The currently authorized CEPP Recommended Plan stores, treats, and redirects approximately 210,000 acre-feet of water on an average annual basis to the historical Everglades ecosystem in lieu of releasing the excess water from Lake Okeechobee through the St. Lucie Canal (east) and the Caloosahatchee Canal (west) to the coastal estuaries (referred to as the Northern Estuaries). The SFWMD Section 203 study recommends changes to the CEPP New Water Project in response to Florida Law Chapter 2017-10 providing direction to SFWMD to expedite planning, design, and construction of improved conveyance, water storage and treatment in the EAA with a reservoir holding a minimum of 240,000 acre-feet. The SFWMD Section 203 Study Locally Preferred Alternative would increase CEPP flows to the central portion of the Everglades from an average annual of approximately 210,000 acre-feet to 370,000 acre-feet overall. Specific changes to the authorized CEPP project features considered in the Locally Preferred Alternative include adjusting from a 14,000 acre flow equalization basin (FEB) to a 10,500 acre, 23-feet deep water reservoir and the addition of a 6,500 acre storm water treatment area (STA) (Figures 1 and 2). Additional features of the study would add conveyance improvements to the Miami and North New River canals and construct new structures to route and discharge water. The effects of these changes are to be evaluated in the EIS and coordinated under Section 106 of the NHPA. SFWMD's proposed modifications to CEPP would require Congressional authorization.

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Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and it's implementing regulations (36 CFR 800), the Corps kindly requests continued consultation on this project. Please send any comments within 30 calendar days of receipt of this letter. If there are any questions, please contact Ms. Meredith Moreno at 904-232-1577 or e-mail at Meredith.a.moreno@usace.army.mil.

Sincerely,

Gina Paduano Ralph, Ph.D.
Chief, Environmental Branch

Enclosure

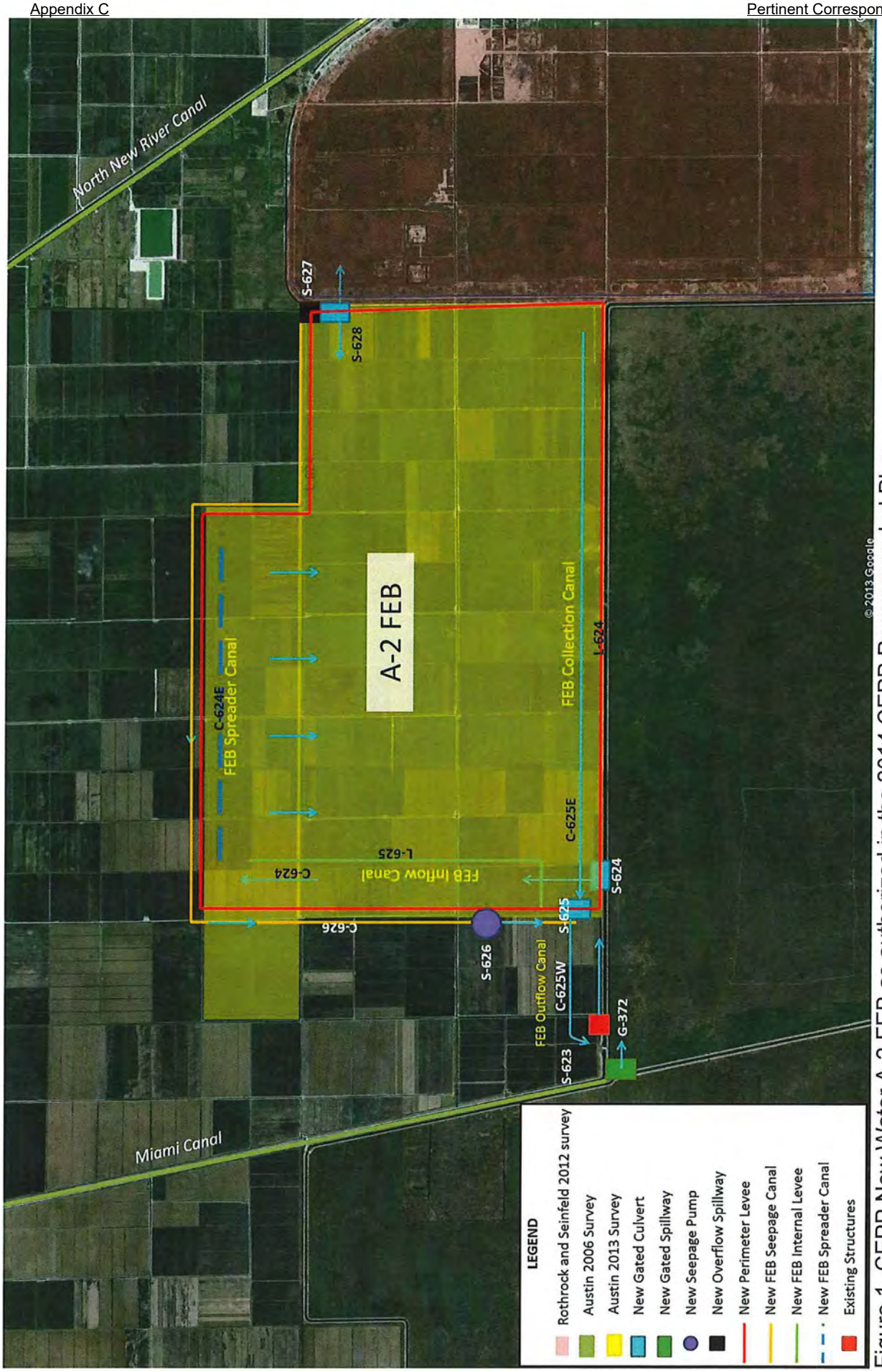

Figure 1. CEPP New Water A-2 FEB as authorized in the 2014 CEPP Recommended Plan.

Figure 2. Proposed Locally Preferred Alternative in the SFWMD Section 203 study.

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-0019

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

MAY 23 2018

Mr. Terry Clouthier
Tribal Historic Preservation Officer
Thlopthlocco Tribal Town
PO Box 188
Okemah, Ok 74859

Re: South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment Area (STA)

Dear Mr. Clouthier:

The U.S. Army Corps of Engineers, Jacksonville District (Corps) is preparing National Environmental Policy Act (NEPA) documentation related to a feasibility study (study) prepared by SFWMD pursuant to Section 203(a)(1) of the Water Resources Development Act (WRDA) of 1986 (33 U.S.C. 2231(a)(1)), as amended. The SFWMD submitted its study on March 30, 2018 to the Assistant Secretary of the Army for Civil Works (ASA(CW)) for review in order to determine under 33 U.S.C. 2231(b) whether the study complies with Federal laws and regulations applicable to water resources development project feasibility studies . This SFWMD study, if authorized, would modify the Central Everglades Planning Project (CEPP), which was authorized as a Federal project by Congress in 2016. The SFWMD study proposes modifications to CEPP features specific to the New Water Project.

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Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and it's implementing regulations (36 CFR 800), and in consideration of the Corps' Trust Responsibilities to the Thlopthlocco Tribal Town, the Corps kindly requests continued consultation on this project. Please send any comments within 30 calendar days of receipt of this letter. If there are any questions, please contact Ms. Meredith Moreno at 904-232-1577 or e-mail at Meredith.a.moreno@usace.army.mil.

Sincerely,

Gina Paduano Ralph, Ph.D.
Chief, Environmental Branch

Enclosure

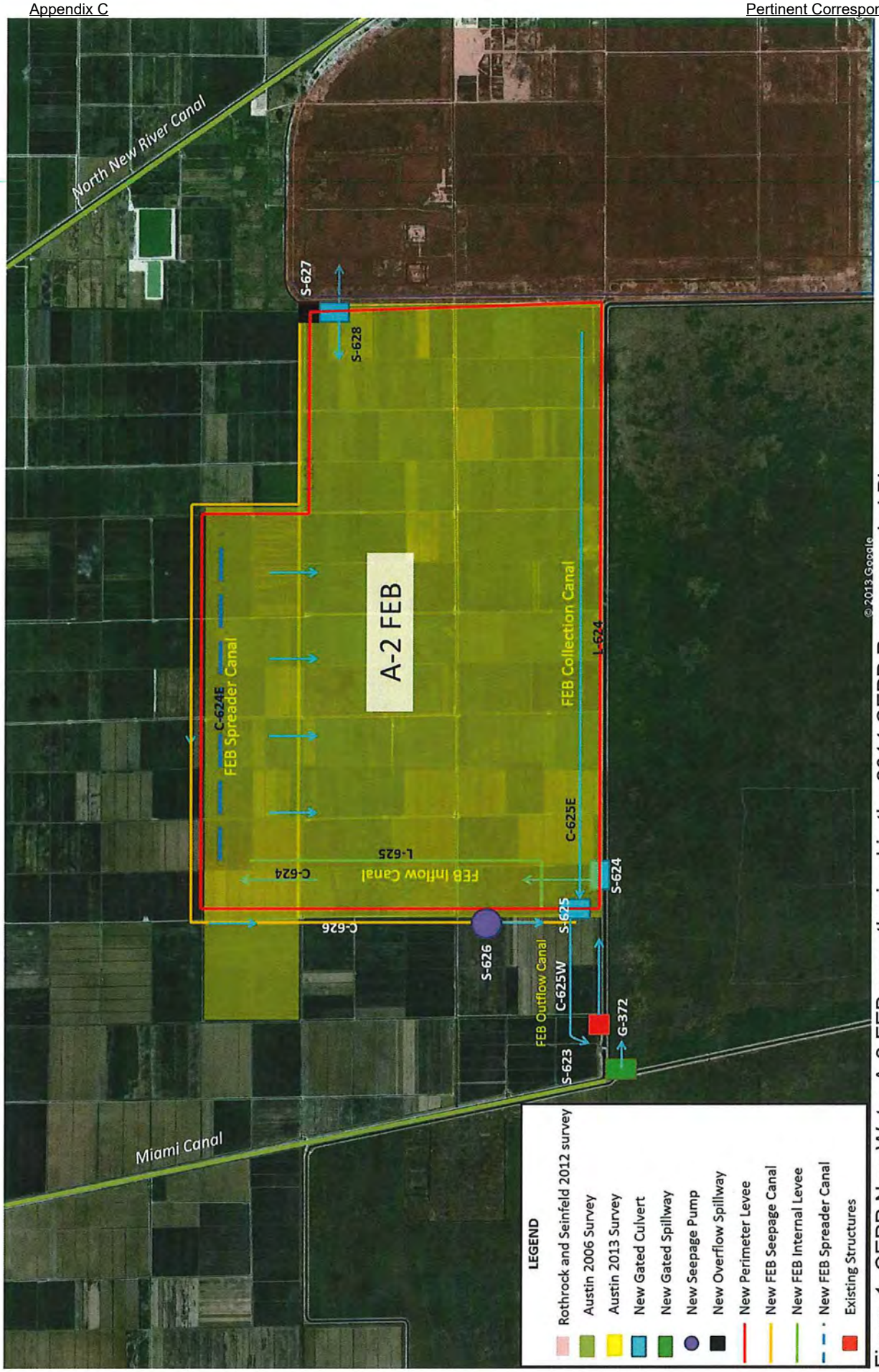

Figure 1. CEPP New Water A-2 FEB as authorized in the 2014 CEPP Recommended Plan.

Figure 2. Proposed Locally Preferred Alternative in the SFWMD Section 203 study.

EAA Southern Reservoir Study – EIS Scoping Comment Response Matrix

Formal Letter Comment Response Matrix

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
Private Citizens		
Robert M. Norton	19 April 2018 Dear Stacie J. Auvenshine My comment on Lake Okeechobee Reservoir plan. I have always been for the reservoir plan from day one. It is what we have needed to stop, the lake discharges and send water south to the Evergaldes. We also need to enforce action to clean up all run-off water from North of Lake Okeechobee. Weith the 36 foot elevation drop to lake Okeechobee, all run-off water from north of lake goes to Lake Okeechobee. By enforcement of BMPs and the 40E-61 we can clean-up run-off waters.	Your support for the project is noted. The state is responsible for addressing water quality clean up. Their efforts are explained in the SFMWD Section 203 Report, Appendix C.1.3.12.
Agencies		
Collier Soil and Water Conservation District		
Dennis P. Vasey Chairman	April 24, 2018 Re: Lake Okeechobee Reservoir Hatched in the final days of a legislative session after months of intense lobbying and championed by the powerful Senate president, Joe Negron, the plan called from construction of a large reservoir in western Palm Beach County aiming to do two things: Stop flushing foul water from Lake Okeechobee to the coasts, and fix the flawed re-engineering of South Florida's tropical wetlands by sending water south to wilting marshes and Florida Bay. Initially, a grander version pitched by environmentalists envisioned 60,000 acres. It included a portion of sugar fields long blamed for pollution and jump-started construction on a sprawling shallow reservoir south of the lake intended to clean water before it reached Everglades's national Park – a project approved in a landmark Everglades restoration plan in 2000. The massive footprint allowed plenty of shallow storage to clean the water, a strict requirement hammered out through years of litigation that forced the state to stop polluting the Everglades. The legislative direction that landed on the drafting of South Florida Water Management District managers was a reservoir on state-owned land below the lake. That mean squeezing a deeper reservoir onto a smaller footprint, with less land for cleaning water. The legislation also sacrificed the valuable option to buy sugar land, requiring the South Florida Water Management District to relinquish the states only leveraging power to acquire land-long before anyone knows for sure whether the down-size reservoir and treatment marshes will work.	Thank you for your comment.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	The district believed the proposed storage reservoir might not work; were just going to have another Lake Okeechobee belching into the Everglades.	

Email Comment Response Matrix

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
AGENCIES		
Alex Gillen Bullsugar Alliance agillen@bullsugar.org	Subject: *** Corps accepting comments on environmental review of State's EAA reservoir study *** I am writing to inquire as to how I get on the email list for the EAA Reservoir project evaluation updates? For email updates, can you please add the following email addresses to your distribution list: apreston@bullsugar.org alanfarago@me.com cmaroney@bullsugar.org pgirard@bullsugar.org agillen@bullsugar.org For hard copy information, can updates be sent here: 2336 SE Ocean Blvd. STE 172 Stuart, FL 34996 If there is a greater Everglades Restoration distribution list, we would also like to be included there is possible. Thanks so much and please let me know if you have any questions or if I should direct this email to anyone else.	All email addresses are added to our email distribution list regarding Everglades.
Alex Gillen Bullsugar Alliance agillen@bullsugar.org	Subject: Comments on Environmental Review of State's EAA Reservoir Study Please find attached comments on the environmental review of South Florida Water Management District's Everglades Agricultural Area (EAA) storage reservoir study for Bullsugar Alliance. Please let me know if you have any questions. **- ATTACHMENTS: -**	

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	This letter is to assist the U.S. Army Corps of Engineers (USACE) in drafting the Environmental Impact Statement (EIS) to evaluate and document potential environmental effects of the South Florida Water Management District (SFWMD) proposed plan for the EAA reservoir, in accordance with the National Environmental Policy Act (NEPA). **Project Area:** The project area for the EAA reservoir, as shown on the map below from the October 23, 2017 meeting at the SFWMD, is too narrowly drawn to adequately account for the environmental impacts of the project. [1] South Florida Water Management District, *Everglades Agricultural Area Feasibility Study*, at 10, https://www.sfwmd.gov/sites/default/files/documents/pres_2017_1023_eaa_res_scoping_meeting.pdf (accessed April 24, 2018). The impetus for passage of Senate Bill 10 (SB10) was excessive freshwater and toxic algae plaguing two communities, while a third community was starved for water. This led to the governor declaring a State of Emergency in 2016. The economic and environmental impacts of this mismanagement were felt throughout these communities along the St. Lucie River, Caloosahatchee River, and Florida Bay. Yet, the project area proposed by SFWMD does not include these surrounding communities. Choosing to not include areas affected by the project is failing to do proper analysis. By pretending beaches in Lee, Martin, Palm Beach, and St. Lucie Counties are not affected, this analysis of the environmental impacts of the discharges is insufficient. For instance, the PACR claims that E.O. 13089 Coral Reef Protection is not applicable because "coral reefs are not affected." But coral reefs exist at Bathtub Reef Beach in Martin County where discharged water closed beaches in 2016. Omitting Hutchinson Island, Bathtub Reef Beach, Stuart Beach, Fort Myers Beach, Sanibel Island, St. Lucie Inlet Preserve State Park, and the Pine Island Aquatic Preserve (to name a few) from the project area understates the benefits of this project. Failure to include these areas in the project area will harm the cost benefit calculation of the project by underestimating the benefits to these harmed areas. Fish spawning success in Florida Bay is impacted by freshwater flows from the Everglades, which will increase as result of the EAA reservoir project. Fish population recruitment in Florida Bay impacts the economic and ecological environments to at least Key West. By including Key West and Marathon in the project area, proper accounting of the human effects to the environment can be more accurately considered.	The study area or affected area is the same that was considered for the authorized CEPP project. This is outlined in the SFWMD Section 203 Report Section 1.5 of the main report and in the following sections: Modeling alternative information - Section 3, 3.1.2 plan formulation strategy, 3.2 screening section and 3.5 formulation of final array of alternatives Information on the TSP - 4.6.2 Identifying the TSP Acceptability - 4.1.2 on pg. 4-7, 4-8 Table 4-2 is the public and stakeholder acceptability. The intent of the project is to store more water in order to reduce flows to the Nothern Estuaries and provide more freshwater south to the Everglades. Those benefits are documented in the SFWMD Section 203 report in Section 4.0. The section 203 process does not allow the Corps to alter the SFWMD report to include additional areas of analysis for benefits, nor does it allow for adding additional alternatives. This Draft EIS describes the effects of the proposed project compared to the 2016 Congressionally

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	Please add all of St. Lucie, Martin, Lee, and Palm Beach Counties to the project area for the EAA reservoir project. Please also extend the project area southward to include Marathon and Key West. **Modeling the alternative:** The Battelle March 12, 2018 independent peer review of the SFWMD's Post Authorization Change Report (PACR) recommended in Final Panel Comment 2 that a much larger reservoir and stormwater treatment area needed to meet water quality standards while delivering project benefits should be evaluated. Please address this alternative as the report suggests. **Jobs Affected:** Please consider the jobs affected in Martin, Lee, Monroe, Hendry, Palm Beach, St. Lucie Counties as a result of this project. Please also see Appendix A, which notes over $4 billion in economic output by the 4 counties declared by Gov. Rick Scott in 2016 to be in a "State of Emergency" as a result of the discharges. Please include direct, indirect, and induced jobs. Please publish your findings. **Health impacts of toxic algae:** Please consider the human health impacts associated with toxic algae discharges, including those containing beta-Methylamino-L-alanine (BMAA). Please also consider the human health impacts of toxic algae in Lake Okeechobee to the communities south of the Lake that use lake water for their drinking water supply. Please study and conduct analysis of the human health impacts from eating marine animals exposed to toxic algae, as occurred last summer in Lake Okeechobee and the St. Lucie River. Please study and conduct analysis of the human health impacts from swimming in toxic algae, as occurred last summer in Lake Okeechobee and the St. Lucie River. Please address the effects of toxic algae on the commercial catfish industry in Lake Okeechobee. Please include analysis regarding what is being done to address the health concerns from eating Lake Okeechobee fish exposed to toxic algae. Please publish all of your findings from these studies. **Species:** Please consider and study the impact of this project on all state and federal threatened, endangered, and species of special concern in the updated project area, and the effects on the habitat from the discharges within the project area. Please document in the study how the habitat of the marine species in the northern estuaries will benefit from reduction of discharges. Specifically, please consider the use of the St. Lucie Estuary and Indian River Lagoon by the Smalltooth Sawfish. Please consider how discharges affect the Bigmouth Sleeper and Opossum Pipefish in the St. Lucie River. Please consider how discharges affect the worm reefs near the St. Lucie Inlet. Please publish your findings for all of these items. **Sailfish Flats:**	Authorized version of CEPP. However, this comment is documented in the record for decision-makers. Economic benefits of the project are included in the SFWMD Section 203 Report, Section 5.2.15 of the main report. Additional analysis on harmful algal bloom effects to specific human environment factors listed in your comment cannot be conducted as part of this Draft EIS under the section 203 process. However, these points are noted for record.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	The Sailfish Flats are located in Martin County off Sailfish Point on Hutchinson Island. The Sailfish Flats are directly in the path of the discharges and should be considered in the study area. Please study the benefit to the Sailfish Flats as a result of a reduction of discharges. Please include in your analysis the economic and ecological benefit to the community as a result of a healthy Sailfish Flats. Please include what species use the Sailfish Flats for foraging and spawning and how they will benefit from a reduction of discharges. Please publish your findings. **Bathtub Reef Beach:** Bathtub Reef Beach is located in Martin County on Hutchinson Island. The proposed project area for the EAA reservoir does not include Bathtub Reef Beach in the project area for the feasibility study. This is a remarkable omission, because waves of toxic algae on Bathtub Reef Beach were a driving factor in the passage of SB10. To exclude Bathtub Reef Beach in the study area is to say that Bathtub Reef Beach will not benefit from the creation of the EAA reservoir. Please include Hutchinson Island in the study area for this project. Please consider the ecological and economic benefits to Bathtub Reef Beach from the reduction of discharges. Please publish your findings. **Conveyance**: Please model dedicated conveyance to the EAA reservoir. Please include in the analysis a scenario where the total capacity of the dedicated conveyance is equal to the combined capacity of the C-43 and C-44 canals. Please include in your analysis whether and how a third high-capacity outlet from Lake Okeechobee will affect the safety of the Herbert Hoover Dike and the communities located south of the lake, specifically addressing risk factors associated with the dike overtopping with water, as occurred with Hurricane Wilma. Please include information and analysis regarding the legal and technical requirements for dams to include a spillway. Please consider the economic value dedicated conveyance would provide to the dam safety work. Please publish your findings. **Home Values**: Please analyze the effects of toxic discharges to local government tax base as a result of the discharges in Martin, Lee, St. Lucie, and Palm Beach Counties. Please publish your findings. **Biscayne Aquifer**: Please consider the effect of the EAA reservoir project on the Biscayne Aquifer,specifically considering how the reservoir will help recharge the aquifer. Please publish your findings. **Lake Okeechobee Regulations Schedule**:	The Corps initiated consultation with the USFWS under the Endangered Species Act on May 1, 2018. A biological assessment of effects of the proposed plan on species listed under the endangered species act is included as part of appendix A entitled FWS coordination.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	Please consider how the EAA reservoir would function with different regulation schedules. Specifically, consider a scenario where human health is the highest priority for managing Lake Okeechobee. Please publish your findings. Please study the effects to the health and sustainability of Bass and Crappie fishery when Lake Okeechobee levels are increased above 16 feet. Please publish your findings. **Agricultural jobs**: Please analyze and document the effect on agricultural jobs as a result of the EAA reservoir project. Please publish your findings. **Conclusion**: Thank you for considering these matters. We are willing and available to work with you and provide technical assistance to further this project. Please do not hesitate to contact me if we can be of further assistance.	
Michael Baldwin "Ding" Darling Wildlife Society drmikeb@comcast.net	Subject: Environmental Review of States EAA Reservoir Study the attached letter is submitted as a comment from the "Ding" Darling Wildlife Society – Friends of the J. N. "Ding" Darling National Wildlife Refuge on the subject study, This letter is in response to the Corps' call for comments on its environmental review of the South Florida Water Management District's Everglades Agricultural Area (EAA) storage reservoir study. Water quality is critical not only for the Ding Darling Wildlife Refuge, but also for all of south Florida. As highlighted by Congressman Francis Rooney, "The Lake Okeechobee Watershed and Everglades have far-ranging impact on the entire State of Florida and the country, but especially in Southeast and Southwest Florida, where 55% of all real estate in the state is affected - 2 trillion dollars of economic impact across 164 cities and 16 counties."1 The Ding Darling Wildlife Society (DDWS) recognizes the fact that there may be limited objections to the South Florida Water Management District's study as there is always more that could be done. However, we believe that the implementation of the recommendations in the study will significantly improve the water quality in South Florida and as such, we strongly support that they be implemented in as timely a manner as possible.	Your support for the project is noted.
Joseph Sullivan (FHWA)	Subject: SFWMD CERP Mod Study Hi Stacie, I do not have a comment at this time, as I have not reviewed the documents yet, but would like to ensure that I am included on future mailings (either email or paper). Thanks.	Email added to the distribution list.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
Alan Farago, VP Conservation Friends of the Everglades	Subject: Friends of the Everglades: Comments on EIS/EAA Reservoir Scoping RE: Everglades Agricultural Area Reservoir Friends of the Everglades offers comments by our consultant, Dr. William J. Mitsch. Friends of the Everglades was founded by Marjory Stoneman Douglas in 1969. Our organization is engaged in legal matters involving Everglades restoration (Miccosukee Tribe of Indians of Florida, Friends of the Everglades, plaintiff, v. United States of America, et al. No. 04-21448-CIV, U.S. District Court South Florida). We appreciate the opportunity to comment on scoping for the EIS and look forward to providing input during the federal review process.	Please see comment responses to Dr. William J. Mitsch
William J. Mitsch, Ph.D. Consultant, Friends of the Everglades Director--Everglades Wetland Research Park, Eminent Scholar--College of Art & Sciences, and Juliet C Sproul Chair for Southwest Florida Habitat Restoration, Florida Gulf Coast University Chair, U.S. National Ramsar Committee	Pertinent Bio: My lab at FGCU, referred to as the "Everglades Wetland Research Park" has published recently and frequently about modeling, monitoring, and experimenting with water quality improvement in the sawgrass "river of grass" eastern half of the Greater Florida Everglades (Mitsch, 2016; Mitsch et al., 2015, 2018; Marios et al., 2015a,b; Yeoman et al., 2017). In addition, over the past 25 years I presented wetland modeling short courses at SFWMD and served on several SFWMD review committees, including serving as chair of a panel reviewing the Everglades Land Model (ELM) in 2006. Over the past 30 years, my lab has published many versions of models specific to wetlands and nutrient retention, particularly related to phosphorus (Mitsch et al., 1982, 1988; Mitsch and Fennessy,1991; Mitsch and Reeder, 1991; Christensen et al., 1994; Wang and Mitsch, 2000; Jørgensen et al., 2005; Zhang and Mitsch, 2005; Marois and Mitsch, 2015a). Introduction: I believe that the Florida Everglades restoration is now at a crucial crossroad that will determine its long-term success or failure so I consider it prudent to make some comments on the EAA Reservoir Plan as it is currently described. We were unable to delve into the details of hydrologic modeling performed by the SFWMD related to this project given the short time allowed for comments and lack of support for a rigorous modeling effort, but I am providing this hopefully constructive critique so that the U.S. Army Corps of Engineers and the South Florida Water Management District can fine-tune the "EAA Reservoir" plan so that it becomes a significant step forward toward completion of a sustainable Florida Everglades restoration. I first express my support for seeing an ambitious effort for eliminating decades of stalling with a serious "sending the water south" strategy, the mantra for a generation of those who understand the big picture of what the Florida Everglades restoration is all	Thank you for your comments.

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Founder and Editor-in-Chief, Ecological Engineering 1992-2017 Professor Emeritus of Environmental Science, The Ohio State University Courtesy Professor of Soil and Water Science, University of Florida Courtesy Professor, School of Geosciences, University of South Florida	about. The South Florida Water Management District claims the EAA Reservoir project will — when used in conjunction with other existing and planned projects — reduce the number of damaging discharge events from Lake Okeechobee to the St. Lucie and Caloosahatchee rivers by 63 percent and increase the flow going south by 76% by 160,000 acre-ft/year to 370,000 acre-ft/year (121 billion gallons per year) of water south to the Everglades and Florida Bay from Lake Okeechobee. But if this plan results in pollutants, particularly phosphorus and nitrogen, getting into greater Everglades (WCAs and south) or develops an unsustainable, un-ecological and/or simply polluted reservoir to manage in perpetuity, we will regret the day we said OK "just to spend the money." I am not assured from what I see written so far from SFWMD that this project is properly focused on what is important—sending clean water to the greater Florida Everglades. If ever there was a need for an ecological engineering and not just civil engineering approaches to lead the Everglades restoration, this is it. The Plan: A current plan, referred to as C240A (Smith, 2018), calls for sending Lake Okeechobee water to a "EAA Reservoir" to be constructed 30 or so miles south of Lake Okeechobee with the following design: 23-foot-deep, 10,100-acres, with the ability to store up to 240,000 acre-ft (78.2 billion gallons) of excess Lake Okeechobee water. The plan also involves completion of a previously approved 15,000–acre A-1 Flow Equalization Basin with a maximum water storage 60,000 acre-feet (20 billion gallons). The plan also includes the design and operation of 6,500 acres of shallow treatment wetlands (sometimes referred to by the SFWMD as Stormwater Treatment Areas (STAs), similar to the 57,045 acres (23,085 ha) of STAs already constructed to clean the water prior to its discharge to the Everglades to the south. Concerns: 1. My first comment concerns the false expectations by the public so that they approve expenditures of up to $2 billion. I have frequently heard "well the project is not perfect, but let's do it while the money is there." The volume of water being discharged south needs to be put in perspective; the 121 billion gallons/year of water eventually being sent south to the Everglades and Florida Bay in the EAA reservoir plan will not solve the estuarine pollution of the Gulf of Mexico and Atlantic Ocean coastlines. Figure 1 illustrates the Everglades Restoration plan that I have had in my textbooks since we published it in the Mitsch and Jørgensen (2004) ecological engineering book 14 years ago and continued to be published in the 4th and 5th editions of "Wetlands" (Mitsch and Gosselink,	The water must be 10 ppb to enter into the Everglades.

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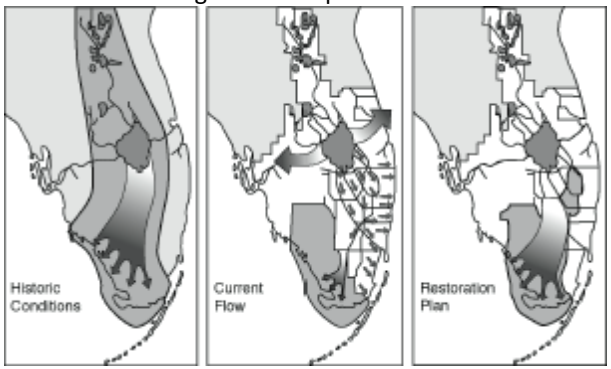
	2007, 2015). I am aware that the restoration plan shown in the 3rd panel has been changed in several more recent publications and in prominent locations including the well-known wall maps at Corkscrew Swamp Sanctuary lobby that now show significant water flowing east and west flow to the coastal estuaries, even when the restoration is complete. It is not clear that the public is aware that this subtle change in graphics represents a major change in the overall restoration goals in the past decade.  Figure 1. Three-picture summary of historic, current, and restoration water flow in the Florida Everglades as provided by the U.S. Army Corps of Engineers in the early 2000s. (from Mitsch and Jørgensen, 2004) To put 121 billion gallons of water per year in perspective, 3.1 billion cubic meters or 819 billion gallons) were discharged to the St. Lucie and Caloosahatchee rivers in the El Nino flooding year of 2016 (Table 1), 6.7 times the flow expected to go south with the EAA Reservoir plan. Even in the last 10 years (2008-2017) an average of 1.5 billion cubic meters per year or 396 billion gallons (Table 1) is 3.3 times 121 billion gallons per year of water that will be sent south according to the plan. Table 1. Freshwater discharges from Lake Okeechobee to the sea over the period 2008-2017, and annually in 2013, 2016, and 2017.	1.The Corps and SFWMD have provided extensive public involvement opportunities throughout the last decade when CERP projects have been proposed.

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Discharge from Lake Okeechobee	2008-2017	2013	2016	2017
Discharge to Caloosahatachee and Gulf of Mexico ($x10^9$ m^3)	1.3	1.6	2.2	1.7
Discharge to St. Lucie and Atlantic Ocean ($x10^9$ m^3)	0.2	0.6	0.9	0.6
TOTAL Discharge to the sea ($x10^9$ m^3)	1.5	2.2	3.1	2.3
Equivalent depth of Lake O discharged to sea (m)	0.8	1.1	1.6	1.2

Discharge data from:
USGS 02292010 CALOOSAHATCHEE CANAL DWS OF S-77 AT MOORE HAVEN FL USGS 02276877 ST. LUCIE CANAL BLW S-308

2. There is insufficient detail on water quality in the plan relative to water volume and flow. The flow south to the Everglades will increase by 76% from 210,000 acre-ft/yr (68 billion gallon/yr) to 370,000 acre-ft/yr (121 gallon/yr) according to the most recent approved version of the EAA Reservoir plan (Smith, 2018). Despite the 76% increase in flow, the project shows an increase in treatment wetlands of only 11% (6,500 acres) to designed to improve water quality directly. I estimate a minimum of at least 43,000 additional acres of treatment wetlands (STAs or passive wetlands) will be needed to treat the water flowing south. Further, we note that the estimated average concentration of phosphorus flowing out of Lake Okeechobee is 147 ppb (Goforth, 2010) while the average inflow to the current STAs in about 100 ppb (SFWMD, 2016). Due to the higher flow, it is common sense that the phosphorus concentrations reaching current and future STAs will be higher than the concentrations reaching them now and, in that case, threaten existing state and federal standards on Everglades water quality.

2.The SFWMD Section 203 Report details are located in the following locations in Annex A: Water quality - Section5, 5.2.9 Table 5.2-2, Appendix C.2.1, C.2.2, Annex F, modeling including DMSTA - Appendix A, Annex A-2 Hydrologic modeling
Also refer to Timing of Sending Treated Flows South, Figure 6-6, pg. 6-17
Implementation sequencing, figure 6-10, 6-11 on pg. 6-54

3. The new EAA reservoir will not resemble any natural feature of aquatic ecosystems in the greater Florida Everglades in ecology, morphology or hydroperiod. The hydroperiods will be wrong and exaggerated for south Florida ecology (similar to the way wetland hydroperiods were shifted in the Great Lakes with diked marsh hunt clubs and conservation areas, Mitsch et al., 2001; Mitsch and Gosselink 2015). The potential amplitude of the annual hydroperiods of up to 23 feet in the EAA reservoir is exceeded only rarely in natural or human-created ecosystems, e.g. the Amazon River (Junk et al., 1992) or Three Gorges Dam reservoir (Mitsch et al., 2008). The reservoir may become a “freak ecosystem” over time, i.e., an aquatic ecosystem dissimilar in hydrology and probably ecology to any other aquatic ecosystem in Florida.

3.The purpose of the EAA reservoir is to hold water in order to provide freshwater to the Everglades during the dry season when needed. The intent is not for the reservoir to be reverted back to the natural Evergaldes ecosystem.

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	4. Most eutrophic lakes in our experience become occasional or even permanent sources rather than sinks of nutrients—Buckeye Lake, Ohio (W.J. Mitsch, personal experience), Taihiu Lake in China (Kelderman et al., 2005), and even Lake Okeechobee (Havens and James, 2005). It is highly probable that the EAA reservoir will not be a nutrient sink in most years, an assumption that is included in this plan. Using a Vollenweider-type model (Hejzlar et al., 2006) in SFWMD's DMSTA model as proof that the EAA reservoir will always be a nutrient sink is ecologically and hydrologically inaccurate and misleading. The DMSTA model was developed to evaluate multiple STA design alternatives. Model simplicity resulted from aggregation of key variables and processes controlling phosphorus storage and cycling (Walker and Kadlec, 2011). But the DMSTA has not been calibrated for reservoirs. Also, the model can be used on a daily inflow step and the empirically derived coefficients are based on long-term annual average values. Conclusions: • The EAA Reservoir is considered the heart of this recent attempt to send water south in the Florida Everglades and is a good start of the discussion of solving water excess and scarcity problems. The Florida State Legislature and the South Florida Water Management District plan to increase the southerly flow by 63 percent and send an average of 121 billion gallons of water south to the Everglades and Florida Bay is noteworthy. • Nevertheless, there is considerable ambiguity in the plan and its model predictions about the quality of the water as it enters the greater Everglades south of the EAA Reservoir and through Miccosukee Tribal lands on its way to the Everglades National Park and Florida Bay. At a minimum, ~50,000 acres of treatment wetlands (STAs) need to be created or restored in proximity to the EAA Reservoir; 6,500 acres of shallow treatment wetlands will be insufficient to protect the Everglades. • The plan for an EAA reservoir immediately south of Lake Okeechobee needs to be re-examined. For example, purchase of farmland at a fair price coupled with conversion of that land to treatment wetlands (perhaps as many as 150,000 acres from the 700,000 acre EAA) in lieu of construction of a ~$2-billion EAA reservoir is a reasonable alternative to the reservoir for water storage and water quality and should be examined. Additionally, state-owned lands currently leased to agricultural tenants could be incorporated in any comprehensive review of alternatives. Adequate wetland creation to achieve water quality in the	4.See reponse to #2.

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	Florida Everglades is true "restoration"; creation of large difficult to manage deep reservoirs is not. If a deep reservoir in Florida's subtropical climate compounds costs and problems for existing Everglades restoration plans, Corps acceptance of this plan should be conditioned by adequate stormwater treatment areas, i.e., treatment wetlands (STA's) and flow equalization basins (FEB's) to mitigate the chances of falling short.	
Kellie Ralston Florida Fisheries Policy Director Keep Florida Fishing American Sportfishing Association	Subject: USACE EAA Reservoir EIS Scoping Comment Letter Attached, please find our comment letter in support of the EAA Reservoir. Please let me know if you have any questions. Thank you	Your support for the project is noted.
Jamie Higgins US Environmental Protection Agency (EPA)	Subject: CEPP Post Authorization Change Report EIS Scoping Comments Please find attached EPA's scoping comments for the Central Everglades Planning Project Post Authorization Change Report EIS. Please let us know if you have questions. **Background:** The EPA understands the purpose of the proposed project is to make improvements to the Central Everglades Planning Project (CEPP) components related to Flow Equalization Basins (FEBs), associated Stormwater Treatment Areas (STAs), and canal conveyance systems that will increase the storage capacity to relieve high water elevations within Lake Okeechobee. The South Florida Water Management District's (SFWMD) stated project goal is to reduce high water elevations within Lake Okeechobee that would then lead to fewer harmful discharge events to the St. Lucie Estuary and Caloosahatchee Estuary, while also increasing flows into the central Everglades1. The EPA staff have participated in numerous SFWMD public meetings, conference calls, and webinars regarding this EIS and feasibility study. The SFWMD requested the EPA and other Federal and State resource agencies provide scoping comments as they prepared the Draft EIS. On November 21, 2017, the EPA provided the SFWMD with scoping comments regarding this EIS and feasibility study. The EPA notes that the SFWMD has prepared a Draft EIS (DEIS) and feasibility study pursuant to section 203 of Water Resources Development Act (WRDA) 1986 (Section 203), as amended. In accordance with Section 203, on March 30, 2018 the SFWMD submitted the DEIS and feasibility study to the Assistant Secretary of the Army for Civil Works for review for the purpose of determining whether the study, and the process under which the study was developed, comply with Federal laws and regulations	

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	applicable to feasibility studies of water resources development projects. On April 16, 2018, the USACE released a Notice of Intent (NOI) to prepare a DEIS or a CEPP Post Authorization Change Report (CEPP PACR) for the Everglades Agricultural Area (EAA) Reservoir. Pursuant to this NOI, it is the EPA's understanding that the USACE has reinitiated scoping to collect comments from agencies and stakeholders. As of this date, the EPA has not thoroughly reviewed the SFWMD's DEIS and feasibility study and our scoping comments (listed below) reflect our current knowledge of the DEIS and feasibility study. **Water Quality Effluent Based Limit (WQBEL**): As noted in the EPA's November 21, 2017, scoping comments, the EPA continues to recommend that the USACE and SFWMD carefully consider the Total Phosphorous (TP) Water Quality Effluent Based Limit (WQBEL) when considering various alternatives for the A-2 parcel. In accordance with Sections 373.026(8)(b) and 373.1501(9), Florida Statue, the Florida Department of Environmental Protection (FDEP) prepared a Secretarial Order4, which approved the proposed project. Regarding the WQBEL, the FDEP states, "*The modeling contains various conservative assumptions and practices to provide certainty that the applicable WQBEL will be achieved by the project. Although all modeling and associated assumptions have some level of uncertainty, permitting requirements applicable to the STAs ensure the WQBEL will ultimately be achieved. In the event the WQBEL is not attained, additional actions to meet water quality requirements must be undertaken. For example, the District could convert portions of the A-1 Flow Equalization Basin to a STA*." (page 5) The EPA acknowledges and supports FDEP's commitment to attaining the WQBEL. **Restoration Strategies Regional Water Quality Plan5:** In response to an order by the United States District Court, Southern District of Florida, EPA, SFWMD and FDEP began technical discussions in 2010 to identify remedies to achieve Florida's 10 part per billion (ppb) water quality standard for TP in the Everglades Protection Area. The primary objectives were to establish the WQBEL that would ensure that discharges from the STAs do not cause or contribute to exceedances of the 10 ppb TP criterion, and to identify a suite of additional water quality projects that would contribute to reducing TP concentrations in discharges from the STAs to meet the WQBEL. Based on this collaborative effort, a suite of projects was identified that would achieve the WQBEL: the Restoration Strategies (RS) Regional Water Quality Plan. The projects are divided into three flow paths (Eastern, Central, and Western), and primarily consist of FEBs, STA expansions, and associated infrastructure and conveyance improvements. The Central Flow Path contains STA 2, STA 3/4, and the CEPP EAA A-1 Storage Reservoir, which was completed as a shallow FEB in 2015 as a requirement of RS. Each flowpath has a separate construction schedule and the Central Flowpath projects were completed in 2015. The EPA	Water quality information is located in the SFWMD Section 203 Report, Annex A in the following locations: Water quality - Section5, 5.2.9 Table 5.2-2, Appendix C.2.1, C.2.2, Annex F, modeling including DMSTA - Appendix A, Annex A-2 Hydrologic modeling Also refer to Timing of Sending Treated Flows South, Figure 6-6, pg. 6-17 Implementation sequencing, figure 6-10, 6-11 on pg. 6-54

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	is available to provide technical assistance to USACE and the SFWMD regarding the WQBEL and other water quality issues related to the proposed project. 4 Valenstein, Noah. Florida Department of Environmental Protection, OGC No. 18-0138, Final Order Approving the Central Everglades Planning Project Post-Authorization Change Report Everglades Agricultural Area Reservoir. Mar. 5, 2018. 5 South Florida Water Management District, Restoration Strategies Regional Water Quality Plan, Apr. 27, 2012. **Tribal Consultation:** As noted in our November 21, 2017, scoping comments, the EPA encouraged the SFWMD to engage in meaningful discussions with the Seminole Tribe of Florida and the Miccosukee Tribe of Indians of Florida regarding the project. Because the SFWMD is not a federal entity, we acknowledge that the SFWMD could not conduct "government-to-government consultations" with the Tribes as that term applies to federal agencies under Executive Order No. 13175, "Consultation and Coordination with Indian Tribal Governments" (Nov. 6, 2000). The EPA notes that, in a recent January 8, 2018, letter[1] to the SFWMD, the Miccosukee Tribe of Indians of Florida outlined many concerns regarding the proposed EAA Reservoir. The EPA encourages both the USACE, as the government agency charged with tribal consultation under E.O. 13175, to conduct tribal consultation as it deems appropriate, and the SFWMD to continue its outreach efforts to the Tribes in conjunction with the Project. The EPA also notes that the EPA works closely with both Tribes on Everglades matters and is committed to working with state and federal partners with regard to the Tribes' water quality and water management concerns. **Environmental Justice (EJ):** The EPA notes that the current tentatively selected plan is entirely on state lands and does not take any agricultural lands out of production. Should changes to the tentatively selected plan require the conversion of agricultural lands to a component of the project, then the EPA recommends the USACE and SFWMD evaluate impacts to low income, minority farmers, and farm workers. .	Thank you for the inforamation and assistance. **Tribal Consultation:** The Corps has initiated Government to Government Consultation with the Miccosukee Tribe of Indians of Florida, the Seminole Tribe of Florida, the Seminole Nation of Oklahoma, and the Thlopthlocco Tribal Town. **EJ:** The plan still includes the same footprint as previously reviewed.
18 Stakeholder Organizations	Subject: EAA Reservoir EIS Scoping Comments Please find the attached scoping comments from 18 stakeholder organizations on the Corps' development of an EIS for the EAA Reservoir Project. April 30, 2018 Re: Everglades Agricultural Area Reservoir	Your support for the project is noted.

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	The undersigned organizations write in support of the Army Corps' development of an Environmental Impact Statement for the South Florida Water Management District (SFWMD) Everglades Agricultural Area (EAA) Reservoir Feasibility Study. The EAA Reservoir is an integral component of the Comprehensive Everglades Restoration Plan and the hydrological benefits described in the SFWMD Feasibility Study are significant in achieving reduction of harmful discharges to the Caloosahatchee and St. Lucie estuaries and increasing freshwater flows to Everglades National Park and Florida Bay. To ensure that the hydrologic benefits of the reservoir are realized simultaneously with meeting the Water Quality Based Effluent Limits (WQBEL), it is important that the Corps of Engineers incorporate into the Reservoir planning documents the water quality assurances included in the March 2018 Florida Department of Environmental Protection Secretarial Order. We greatly appreciate your expedited review of this critical restoration project so that a Post Authorization Change Report (PACR) can be included in the 2018 Water Resources Development Act (WRDA) for Congressional authorization and the benefits of this project realized as quickly as possible. The undersigned organizations and many others have remained engaged through the rigorous schedule of public meetings and information sessions that have taken place since the initiation of this planning project in October of 2017. We thank you for the opportunity to comment and look forward to additional opportunities to provide input during the federal review process.	
Diana Umpierre Sierra Club	Subject: Sierra Club Comments for USACE on Developing the EIS for EAASR SUBJ: Comments on USACE's development of an Environmental Impact Statement (EIS) for the SFWMD's EAA storage reservoir study On behalf of the Sierra Club, we would like to provide a copy of comments and questions that we previously provided to SFWMD while they were developing their Tentatively Selected Plan (TSP) for the EAA Storage Reservoir and associated Central Everglades Planning Project Post Authorization Change Report (PACR). These are missing from the PACR, the Integrated Feasibility Study, and the Draft Environmental Impact Statement (FS/DEIS) that SFWMD submitted to Assistant Secretary of the Army for Civil Works on March 26, 2018. This information is missing and is not addressed in the PACR's Appendix C where comments and letters from other stakeholders were included and addressed. Since our input is missing, we are concerned that other stakeholder input might also be missing. * Nov 22, 2017 Letter with our written scoping comments on the EAA storage reservoir	1. The TSP provides minor beneficial effects to nearshore Florida Bay specifically an increase in annual overland flows at Transect 23. 2. The TSP delivers an average annual flow of 370,000 acre-feet of new water south to the Everglades. 3. The CERP Goal for reduction in damaging discharges from Lake Okeechobee to the Northern Estuaries is 80%. The TSP: a. provides a 40% reduction in high-flow discharge events lasting

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	* Feb 9, 2018 Letter with questions prompted after SFWMD presentation to the Governing Board on February 8, 2018 * Re-submission of February 9, 2018 letter questions and February 22 and 29 questions which remained unanswered. We look forward to reviewing and providing additional comments once the draft Environmental Impact Statement is available for public input. Dr. Mr. Albert, On behalf of the Sierra Club, we would like to submit the following comments and questions as part of the scoping of the Evergaldes Agricultural Area (EAA) Reservoir Project. **Background** The EAA Reservoir is an integral part of the Comprehensive Evergaldes Restoration Plan (CERP), which will help solve Florida's ongoing water crisis while restoring the globally unique and invaluable Everglades ecosystem. Florida's coastal waters have long been on the brink of ecological collapse. Billions of gallons of water continue to be discharged from Lake Okeechobee to the St. Lucie and Caloosahatchee estuaries, wasting valuable freshwater needed elsewhere and that is vital to Florida's environment and economy. The extreme freshwater discharges have upset the natural salinity balance in the estuaries needed for oyster, seagrasses, and other aquatic species to survive. The discharges have also carried high levels of nutrients and sediments, causing and contributing to harmful algae blooms, smothering native vegetation, and harming fish and coastal birds. The estuaries' famously clearn coastal waters have turned dark brown and green, driving away tourists, damaging local businesses, and reducing home values. Scientists have even detected harmful bacteria in some areas, making the water dangerous for contact with people, pets, and livestock. At the same time, insufficient freshwater flow to the Southern Evergaldes caused a substantial seagrass die-off in Florida Bay in 2015 that resulted in the loss of more than 50,000 acres of seagrasses in Everglades National Park. The once blue waters looked like pea soup and negatively affected recreational and commercial fishing as well as other water-related activities that bring tourists to the Florida Keys. If this situation persists and is not addressed as quickly as possible, the prediction for Florida Bay is an even deeper collapse. Increasing storage throughout the Everglades watershed is key to getting the water right on the north and souther end of the ecosystem. With storage projects west and north of Lake Okeechobee already in the planning pase, and given these ongoing emergency	longer more than 60 days in the Caloosahatchee Estuary b. Provides a 55% reduction in high-flow discharge events lasting longer more than 42 days in the St. Lucie Estuary c. Provides a 55% reduction in discharge volumes from Lake Okeechobee to the Northern estuaries with authorized projects d. Provides a 63% reduction in discharge events from Lake Okeechobee to the Northern estuaries with authorized projects e. Improves the salinity conditions in the St. Lucie Estuary by reducing the number of Lake Okeechobee events that exceed the preferred salinity envelope by 39% f. Improves the salinity conditions in the Caloosahatchee Estuary by reducing the number of Lake Okeechobee events that exceed the preferred salinity envelope by 45% 4. Early screening outcomes identified a high potential for this project to meet or exceed the CERP Goals in sending water to the central Everglades. The screening analysis compared the Pre-CERP Baseline (USACE 2005) with the CERPA scenario, the updated model scenario from the RECOVER 2005 Initial CERP Update effort (RECOVER 2005), to establish the CERP Goal for flow to the central portion of the Everglades. This analysis identified the CERP Goal flow target of approximately 300,000 ac-ft of new water on an average annual basis over the 36-year modeled simulation period (1965-2000) available from RECOVER. This

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	conditions, the Sierra Club strongly supports advancing the EAA Reservoir project to provide relief to the ecosystem as envisioned by CERP in 2000. Our comments and questions below are based on out understanding of the limited information presented thus far via public meetings, which have included substantial repeated information and were held in less than a 1-month period between October 23 and November 16, 2017. **Project Objectives, Scope and Study Area** We agree with the District's dual project objectives of reducing high-volume freshwater discharges to the northern estuaries and identifying storage, treatment, and conveyance south of Lake Okeechobee to increase freshwater flows to the Everglades and Florida Bay. Working toward these goals contemporaneously will lead to a more holistic solution that benefits the entire Greater Everglades, versus segmenting into smaller regions and failing to consider system-wide impacts. That said, it must be recognized in the project planning process and in the weights assigned to project evaluation criteria and benefits, that SB 10 was introduced and passed in recognition that high-volume freshwater discharges to the St. Lucie and Caloosahatchee estuaries are an emergency and a disaster that must be resolved. Therefore, project alternatives should be weighted accordingly to ensure reduction of these high-volume discharges as much as possible. To achieve this goal, the planning process must include identifying adequate land acreage for stormwater treatment to ensure the maximum possible reduction of discharges. We urge the District to expand the project study area to include all areas that are adversely affected by high-volume lake discharges as well as all areas that will benefit from this project, or clarify if these are already included. The study area for the EAA Reservoir Project, as outlined by the District in its October 23, 2017 meeting, does not appear to include most of areas that are known to be adversely affected by high-volume lake discharges in Martin and St. Lucie Counties, including Hutchinson Island (slide 10 of meeting presentation). A similar omission was noted along the Caloosahatchee and its estuary. The District should be consistent with the study area identified for the Central Everglades Planning Project (CEPP) to ensure that the entire range of the ecosystem from Lake Okeechobee to Florida Bay, is included in the scope of work and project benefits analysis. https://www.sfwmd.gov/sites/default/files/documents/pres_2017_1023_eaa_res_scoping_meeting.pdf It is also critical to include the economic and ecologic impacts of high-volume Lake Okeechobee discharges to the northern estuaries. Ignoring these would prejudice the	CERP Goal flow target, based on a 36-year period of record, became the updated target for continued plan formulation work. The TSP approaches the CERP Goal based on the 36-year period of record. 5. The CERP Goal for reduction in damaging discharges to the Northern Estuaries is 80%. The performance measure for the Northern Estuaries is a reduction in the number of high flow events. 6. The number of high flow events reduced by the FWO (CEPP) and the CEPP PACR and the % difference in the number of those events the CEPP PACR provides over the FWO (CEPP) can be found in Table 6-4 of the report. 7. The operational flexibility used in C240A is implemented by dividing the reservoir into two operational zones. These zones are the bottom one-third of the storage volume and the upper two-thirds of the storage volume. The bottom one-third of the reservoir storage volume only releases water to the environment (downstream Everglades). When the reservoir is in the upper two-thirds of the storage volume, releases are made from the reservoir to both the environment (downstream Everglades) and to maintain canal elevations in the Miami and North New River basins of the Everglades Agricultural Area. 8. Please submit a formal public records request to obtain this information. 9. The SFWMD held coordination meetings with the Miccosukee Tribe of Indians of Flor-

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	evaluation and decisions against the estuaries by underestimating benefits to the northern estuaries and come up with deep reservoir that will likely be deemed to have insufficient benefits to outweigh the costs. We have serious concerns over the limited scope of calculating ecosystem benefits as the project advances. At the October 31, 2017 meeting, staff shared that while they embrace increasing southern flows to the Greater Everglades as a project objective, time constraints may prevent staff from fully analyzing flows to Florida Bay and Everglades National Park. Leaving these ecosystem benefits out of calculated benefits would be a disservice to the project, the Everglades, and the Florida Keys. The District adopted CEPP as its guiding principle in developing the modeling for the EAA Storage Reservoir project, which seems appropriate as the EAA Reservoir is intended to be authorized as a Post Authorization Change Report to CEPP. However, in order to stay consisten with CEPP, reservoir planning should incorporate and adopt the CEPP purpose and need, which is: "to improve the quanitity, quality, timing, and distribution of water flows to the Northern Estuaries, central Evergaldes (Water Conservation Area 3 [WCA 3] and Evergaldes National Park [ENP], and Florida Bay while increasing the water supply for municipal and agricultural users." (CEPP PIR, pg. ES-1). As such, we strongly urge the District to ensure that ecological benefits to Everglades National Park and Florida Bay are included in ongoing EAA Reservoir analysis. **Process and NEPA Compliance** Among the constraints presented at public meetings is the need for compliance with the National Environmental Policy Act (NEPA). We agree that compliance with all requirements of NEPA, as well as other applicable federal laws, is critical for this process. Section 203 of the Water Resources Development Act (WRDA) of 1986, under which this project is being developed, requires the Secretary of the Army, prior to recommending the project for approval, to determine if the study, and the process under which the study was developed, comply with all Federal laws and regulation applicable to feasibility studies of water resources development projects. To accomplish this objective, we urge the District to work in close partnership and consultation with the US Army Corps of Engineers to identify, outline, and make publicly available all federal compliance requirements to ensure that they are met in a timely manner. We sure the district to provide meaningful and accessible NEPA-compliant public participation to those that stand to benefit the most, as well as be impacted, by this project. While it has been appropriate to schedule some of these meetings in West Palm Beach and Clewiston, the District must also provide just and equitable public participation opportunities within other parts of the project study area, in particular Miami-Dade/ Monroe region which faces longer traffic-congested commutes. Since one of the	ida and the Seminole Tribe of Florida to provide updates on the project. Formal Government to Government consultation must be initiated by the lead Federal Agency and will occur during the USACE review of the CEPP PACR submitted under Section 203. 10. A) The Governing Board provided concurrence on submitting the CEPP PACR to the ASA(CW) by March 30, 2018. The GB was provided a draft copy of the CEPP PACR prior to the March 8th meeting. The final CEPP PACR was posted to the EAA Reservoir website on March 26, 2018. B) The draft report underwent an Agency Technical Review (ATR) and an Independent External Peer Review between February 9, 2018 and March 27, 2018. 11. Deep Injection Wells were not included as part of the CEPP or CEPP PACR. Additional questions submitted on February 26, 2018 ➢ The Governing Board provided concurrence on submitting the CEPP PACR to the ASA(CW) on March 30, 2018. The GB was provided a copy of the draft report prior to the March 8, 2018 meeting. ➢ The agencies and entities invited to participate in the ATR included: SFWMD, FDEP, USACE, USEPA, FDOT, NOAA, USFWS, FWC, USNPS, USDA, Martin County, Palm Beach County, Broward County, Miami-Dade County, Lee County, Hendry County, Belle Glade, and Clewiston. The ATR began February 9, 2018 and comments were due by February 23, 2018.

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	objectives of this project is to benefit the southernmost region of the Everglades ecosystem, residents and other stakeholders in that area should be given equitable opportunity for public engagement. That kind of engagement is not possible via web-casted meetings or via the structure of District governing board meetings. We ask for the District to provide information on how the planning process is identifying and addressing environmental justice concerns per NEPA requirements and guidance. **Priorities and Assurances** As EAA Reservoir planning advances, Sierra Club wants to ensure that the project provides maximum benefits throughout the Everglades ecosystem with particular emphasis on the following issues: **Water Quality** Meeting state and federal water quality standards is paramount for this and all other CERP projects. The District must make public the results of District modeling so that stakeholders are able to analyze and understand how the project configuration alternatives will aximize storage and conveyance south while meeting water quality standards to ensure that clean water is delivered to the Southern Everglades and Florida Bay. **Water for the Natural System** Per legislative guidelines set forth in SB10, and in compliance with CERP goals, we understand the reservoir will achieve at least 240,000 acre feet of water storage. It is paramount that this amount of water is the minimum amount dedicated for the natural system. This volume of water, and more, is needed for Everglades National Park and Florida Bay. Accordingly, alternatives that provide greater quantities of water storage with the necessary water quality treatment should also be evaluated. **Maintain Progress** Both state and federal agencies have committed to keeping the Central Everglades Project on track, particularly PPA South components that will bring direct benefits to Everglades National Park. Maintaining forward momentum on CEP, additional bridging of Tamiami Trail, construction completion and operation of Mod Waters, C-111 South Dade, and C-111 Spreader Canal, are all critical to achieve the ecosystem benefits envisioned by the Florida Legislature in SB10. **Assessment of Needed Land** As alternative development and modeling move forward, the critically important issue of the acreage required to achieve all project goals needs to be resolved. We ask the District to not limit its evaluation of alternatives to lands currently in state ownership, but instead to focus its evaluation on alternatives that provide the greatest environmental benefits and to move quickly to identify how much additional land will be needed to develop cost	➢ All the modeling output files were posted on the EAA Reservoir website. The Draft EIS and SFWMD Section 203 Report should address all other comments and questions, however, if they do not, please contact us at EAAReservoir@usace.army.mil or at EAAreservoir@sfwmd.gov

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	effective project alternatives that achieve the storage, conveyance and water quality goals outlined by the Florida Legislature and CERP. We ask the District to run modeling for the EAA Reservoir that takes into account ALL state-owned land within the EAA that may be used for land swaps, as well as additional lands that may need to be purchased from willing sellers to meet all project objectives in a cost-effective manner. Based on the initial modeling provided by the District, we believe that the District has failed to include enough land to construct a reservoir that would provide meaningful benefits to the estuaries as well as provide meaningful conveyance and treatment of water through the EAA and into the Everglades. Instead, the District has proposed to only model reservoir alternatives on the existing footprints of parcels A-1, A-2 and lands just west of A-2. As a result, the proposed reservoir alternatives are much deeper than originally envisioned by CERP, provide less effective STAs, are likely cost-prohibitive, and offer less ecological benefits. **Conveyance Capacity** The EAA Reservoir Project requires conveyance improvements from Lake Okeechobee to the site of the reservoir. To maximize effectiveness and benefits, we recommend the District evaluate cost-effective alternatives that increase the amount of freshwater that can be treated and sent south. This should include alternatives that not only smooth existing canal profiles, but also expand them beyond thir current footsteps. A common excuse for not sending more Lake Okeechobee water south is insufficient outlet capacity and canal conceyance capacity. To address these limitations, the following features should be evaluated in order to allow for greater capacity and maximize the benefits of the EAA Reservoir project: - New outlet(s) from Lake Okeechobee to increase the outlet capacity to thr south, which would also help reduce the risk of Herbert Hoover Dike (HHD) failure. - New canal(s) to send Lake Okeechobee water to the EAA reservoir, including during periods of high water in the EAA. - Hydraulic connection to the western basin, the C-139 Basin in Hendry County, since STA-5/6 often dries out and has excess water treatment capacity, and the west side of WCA-3A often needs more water. **Reservoir Water Depth** We question the cost feasibility, safety and ecological benefits of constructing the deeper reservoir options proposed by the District. One of the options calls for a reservoir that would hold at least 24 feet of water, an amount that is significantly higher than ever envisioned by CERP.	

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	The reservoir dimensions proposed would need very high and wide berms. The design of the reservoir must be cost-effective for federal approval and configurations deeper than 12 feet might not be efficient enough to qualify. We ask the District to take advantage of the work that led to the 2006 Revised Draft Integrated Project Implementation Report (PIR) and Environmental Impact Statement (EIS) for the Everglades Agricultural Area (EAA) Storage Reservoirs project, which had recommended a 12-ft reservoir providing 360,000 ac-ft of water storage. http://141.232.10.32/pm/projects/proj_08_eaa_phase_1.aspx **Presentation of Results for Wetter Years** We ask the District to be more forthcoming and clearly present modeling results for wetter years, which are the years when high-volume discharges to northern estuaries are more likely. Instead, as we understand it, the data presented at public meetings includes graphs with only average monthly flows within the model period of record, when the project might send 300,000 acre-feet per year to the south, mainly during dry season. Evaluating project alternatives based on average conditions will underestimate project benefits. **Other Comments and Questions** We ask for clarification on the specific uses of land outside of effective acreage for storage and treatment. The District should not terminate the US Sugar Option Agreement mentioned in SB 10 until all lands needed for this project are acquired. Has soil subsidence issues within the EAA been factored into project alternatives? We ask for clarification on how applicable federal and state water quality standards were factored into the DMSTA modeling to determine compliance with the strictest applicable standards. The readme.txt file provided by the District with the DMSTA screening results dated November 7, 2017 states the evaluation was performed to achieve 13 ppb or less, of presumably phosphorus. Why 13 ppb and not 10 ppb? The District should put on hold the bidding and sale of the larger tracts on the District's land surplus database in order to maximize opportunities for willing land owners to swap lands that could be used for the EAA Reservoir project. When the District conducted its comprehensive land assessment in 2013, the analysis, and hence its recommendations, did not include opportunities to use some of those District lands for purposes of land swaps to benefit the future EAA reservoir project envisioned by CERP. **Submitted Feb 9, 2018 – No response received** The SFWMD presentation to the Governing Board on February 8, 2018 has prompted a number of questions for which we would greatly appreciate answers, preferably in writing/ email. Our full understanding of the District's position depends on receiving	

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	responses to these and perhaps subsequent questions. For now, the questions are the following: 1. What was meant by the statement that the Tentative Selected Plan (TSP) delivers only "near-shore benefits to Florida Bay"? Can you be more specific on where within the Florida Bay will these benefits be delivered and what they will be? 2. A presentation slide stated the TSP delivers ~ 370 kac-ft of new water flows (average annual), but the SFWMD press release says ~300 kac-ft. What is the actual approximate number based on the model outputs? Please specify the graphs/charts when responding. 3. What was meant by the statement that the TSP "approaches" CERP goals for reducing damaging discharges; what exactly does "approaches" mean quantitatively? 4. Will the TSP deliver the CERP goal for clean water conveyed south to Everglades National Park and Florida Bay? What is that CERP goal and where it is documented? We made a similar request on or about December 8, 2017 and received a response from the District that there were no responsive records. 5. What are the CERP goals for the 3 performance measures related to discharges to the northern estuaries mentioned in the presentation? a. % reduction of high-discharge events lasting more than 60 days b. % reduction of discharge volumes c. % reduction of Lake O events that exceed preferred salinity 6. For the percentages related to reducing damaging discharges, how much of those percentages are benefits from CEP vs from CEP+EAA Storage Reservoir? What is the percentage of reductions above what CEP was already scheduled to achieve? 7. C240A was categorized as "multi-purpose" to add extra benefits for the same cost. What was meant by "a multi-purpose reservoir"? Is water supply for agriculture included in this TSP? If yes, how much? In the "Next Steps" slide, can you elaborate on what was meant by "identify water protected for the natural system"? 8. C240A was categorized as "multi-purpose" to add extra benefits for the same cost. What was meant by "a multi-purpose reservoir"? Is water supply for agriculture included in this TSP? If yes, how much? In the "Next Steps" slide, can you elaborate on what was meant by "identify water protected for the natural system"?	

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	9. How is the District communicating with the Miccosukee Tribe and the Seminole Tribe in regards to this specific project, the EAA storage reservoir? 10. Regarding reports, final reports and comment periods: a. What will the Governing Board be voting upon on March 8, 2018? Will the Governing Board have seen something other than what was presented on Feb. 8 before that vote? If so, when will public see what the Governing Board will vote upon? b. SFWMD staff stated that the "draft" plan will be shared with government agencies and entities (fed/state/local). What are the opportunities for these agencies to respond to/comment on the draft report/plan? What are the opportunities for other stakeholders and the general public to respond to/comment on the report? I. Did the failure to produce and/or make public a draft report on January 30 impact any comment period? II. Upon which date does (or did) the state agency review begin? What is the comment period for stakeholders and the general public? III. Upon which date will the NEPA comment period begin? **11.** Has the SFWMD rejected the use of Deep Injection Wells as part of its plan to reduce Lake Okeechobee discharges to the northern estuaries? If not, what are your plans to use deep injection wells? **Submitted Feb 22, 2018 – No response received** On Nov 22, 2017, by a deadline provided by SFWMD for written scoping comments for the EAA storage reservoir, Sierra Club submitted comments via email. Attached/ Below is the email and letter. I am re-forwarding this information because the District has not yet acknowledged receipt. We want to make sure that our comment letter was received and it will be included in the draft CEPP PACR/ FS/ EIS that agencies will be reviewing, including District responses to our questions. We are concerned that our letter has not been taken into account. This is because on December 8, 2017, we submitted a public records request that asked for "copies of all stakeholder public comments that the SFWMD has received from May 1, 2017 to December 8, 2017, including electronic mail, in-person submissions, and regular mail, regarding the proposed EAA Reservoir pursuant to Chapter 2017-10 of Laws of FL (SB10).". What we received seemed limited and it did NOT include our own letter submitted to the District on Nov 22. Hopefully, our letter was the only public comment omitted from our request.	

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	PLEASE, CAN YOU CONFIRM THAT OUR LETTER HAS BEEN INCLUDED IN THE DRAFT CEPP PACR/ FS & EIS THAT WILL BE SENT TO THE GOVT AGENCY TECHNICAL REVIEW THAT WILL BE CONDUCTED? **Submitted Feb 26, 2018 – No response received** In addition to the attached questions sent on Feb 9, we have the following additional questions: >> It was mentioned that District staff will seek GB authorization to submit the Post Authorization Change Report (PACR) to ASA. What specificically will the GB be "authorizing" in their March GB mtg? Will you be sharing with GB members a draft copy of the PACR report, including its appendices/ annexes before their March mtg? If no, what will you be providing so they make an informed decision outside of information on Powerpoint slides? >> It was mentioned that District staff will seek GB authorization to submit the Post Authorization Change Report (PACR) to ASA. What specificically will the GB be "authorizing" in their March GB mtg? Will you be sharing with GB members a draft copy of the PACR report, including its appendices/ annexes before their March mtg? If no, what will you be providing so they make an informed decision outside of information on Powerpoint slides? >> Are the model run output files used to calculate the quantitative benefits of the proposed C240 alternative that were presented at the NAS committee meeting last week on your FTP public site? I looked but only saw the files from an earlier run, posted on Jan 30, 2018. Among others, I'm trying to ascertain if these are model run files that provide the backup data for the estimated increase of flows of approximately 370,000 ac-ft (average annual).	
W. Ray Scott Florida Department of Agriculture and Consumer Services	Subject: EAA Storage Reservoir PACR Scoping Comments May 1, 2018 The Florida Department of Agriculture and Consumer Services (FDACS) appreciates the opportunity to provide comments on the Environmental Impact Statement (EIS) the United States Corps of Engineers (USACE) is preparing in accordance with the National Environmental Policy Act (NEPA) on the South Floruda Water Management (SWFMD) Section 203 Tentatively Selected Plan (TSP) for a Post Authorization Change Report (PACR) to modify the Central Evergaldes Planning Project (CEPP) eatures specific to New Water Project Partnership Agreement (PPA). We are submitting the following comments for consideration.	Thank you for your recommendations.

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	Our review focused on aspects of the SFWMD CEPP New Water PPA PACR which may impact private agricultural lands and agricultural operations. The comments provided are specific to the topics addressed below and do not constitue a review of the entire PACR and its supporting appendices. **1.Water Supply**. We are pleased to see the significant reduction in water shortage cutbacks shown in the PACR through use of the EAA reservoir to meet irrigation needs in the service area. The Corps needs to be explicit in making this operational requirement a formal part of the operation manual section associated with the reservoir. **2.Flood Protection**. Agricultural flood protection is another major concern for FDACS. Based on a quick review of the model output readily available, it appears that the current level of service will be maintained. The EAA reservoir project in the 1999 plan approved by Congress was one of the only two projects that included the enhancement of flood protection as a a projecr purpose. The conveyance enahncements in this plan coupled with the new inflow pump station for the reservoir would allow some enhancement to be achieved through purely operational means and it would seem this should be part of the analysis. The ability to reduce peak stage in both the Miami and North New River Canals could greatly reduce the need for flood control pumping at S-2 and S-3 while providing improved flood protection for the farms and cities near the lake. **3.Schedule**. The schedule shown in the PACR needs to coney a realistic time frame in keeping with the constrained schedule provided in the CEPP report and the actual federal funds that have been made for Comprehensive Everglades Restoration Plan (CERP) projects since. **4.Project Dependencies**. The project dependencies and sequencing of CEPP and non-CEPP projects is a major concern for FDACS since the success of all projects without negative impacts to both developed and undeveloped lands relies on proper sequencing to address water quality, construction prerequisites, operational options, and seepage control. Based on our review, it is not clear to us that the carefully thought out sequencing included in CEPP has been followed. **5.Operational Changed Availible Under Excisting CERP.** Several areas show improved environmental performance that seems to be realted to operational changed that are not dependent on changed to the size of the A-2 reservoir. It specifically mentions changed to the upper bands of the Lake Okeechobee schedule and modifications to south Dade operations to achieve more benefits for Florida Bay. These changes, and potentially others, that are not dependent of the additional storage in A-2 should be included in the EIS analysos so it is clear that all the outcomes shown in the PACR are not related solely to the additional storage being proposed and are available under the existing CERp authorization.	

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PRIVATE CITIZENS		
Shaun G. MacKenzie, P.E.	Subject: CERP Comment I support the proposed project.	Your support for the project is noted.
Howard Snoweisss	Subject: Curtailing discharges from Lake Okeechobee I am writing to express my support of the Army Corps purchasing the land that is required in order to move the water south. As a resident of Stuart, who lives along the St. Lucie inlet, my family and I can attest to the importance of this project. Please move ahead with the land purchase and encourage congress to approve the plan.	Your support for the project is noted.
David Preston	Subject: EAA Reservoir Comments I am in full support of the EAA Reservoir project as described in CERP. Water storage south of Lake O is arguably the heart of CERP, and without it we are looking at a +/-$20b Everglades Restoration plan that doesn't accomplish its goal and sacrifices the quality of life, environment, economies, and public health of our coastal communities. We cannot afford to kick the can down the road another day on this critical project and its much needed benefits to both the parched Everglades and coastal communities drowning in billions of gallons of polluted fresh water from Lake O on nearly an annual basis. The drinking water supply for 8 million FL residents is also at risk. I urge the ACOE and SFWMD to continue forward with the project, but am very concerned that the footprint was artificially constrained to appease the sugar industry, and that the benefits described by the SFWMD will not be realized. If these benefits are not realized, our taxpayer money has clearly not been well spent. Please leave no stone unturned in maximizing this once in a lifetime opportunity, and ensure that the benefits as described in the SFWMD's proposal are ENSURED. Thank you.	Your support for the project is noted.
Micheal Conner	Subject: EAA Reservoir Effectiveness I feel that the project as is will not provide the needed relief from Lake Okeechobee discharges to either the St. Lucie River or the Caloosahatchee River. A 50 to 60 percent reduction is not going to spare these failing estuaries. I live in Stuart and the damage wrought by the past three or four discharge events have killed too much grass and marine organisms, and the public health threat is unacceptable. The amount of water that the EAA project will send south to Florida Bay is inadequate as well. Specifically, the project footprint does not allow for enough water cleansing. A 24 foot deep reservoir is not what we envisioned. The A2 and A1 land will not get this job	Benefits of the recommend plan are discussed in section 6.0 of the SFWMD Section 203 main report. Water quality was a planning constraint in the SFWMD study and was analyzed and reported in the SFWMD Section 203 Report, Annex A in the following locations: Water quality - Section5, 5.2.9 Table 5.2-2, Appendix C.2.1, C.2.2, Annex F, modeling including DMSTA - Appendix A, Annex A-2 Hydrologic modeling Also refer to Timing of Sending Treated Flows South, Figure 6-6, pg. 6-17

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	done. The SFWMD did not put enough effort into acquiring land, as was directed by Senate Bill 10. As I understand it, during dry times, the agricultural industry will be granted the right to tap the EAA reservoir for irrigation. That is ludicrous. The sugar industry fought against this project tooth and nail. They should not be given a drop of that water. I am disappointed that we must wait 8 or more years for something that won't do the job.	Implementation sequencing, figure 6-10, 6-11 on pg. 6-54. Water supply for existing legal users was stated as another purpose of this study in the executive summary of the SFWMD report.
Cindy McDonough	Subject: EAA Reservoir I am sending you my comments on the proposed EAA reservoir for Lake Okeechobee, Florida. I am very concerned about 2 major problems with the proposed reservoir. First, it is way too small to substantially reduce toxic water flowing to the Gulf of Mexico or the Atlantic. No modeling appears to have been done to see if it will even work! Reducing toxic flow by barely half is simply not enough to help the estuaries and the everglades to recover. The toxicity of these flows gets worse every year and this project hardly changes this. Second, the proposed timetable is outrageously and inexplicably slow. We built the Hoover Dam in only 5 years! There will be nothing left to save given this protracted schedule!! I hope the Army Corp of Engineers looks very thoroughly at these issues and requires a larger reservoir that will cut toxic flows more substantially-by 75% at least!	As part of the Section 203 process, the Corps cannot at this point add additional analysis or alternatives to the report. The Corps is evaluating the section 203 report to ensure it has addressed applicable federal laws required for water resource projects, as well as the feasibility of the report. The study area or affected area is the same that was considered for the authorized CEPP project. This is outlined in the SFWMD Section 203 Report Section 1.5 of the main report. Your concern about the projects lengthy implementation time frame is noted for the record.
Robert Gibbons	Subject: Enlarge Reservoir We need to totally eliminate discharges from Lake O into the St. Lucie and Loxahatchee estuaries. Thus, the Reservoir and wetland filters need to be much larger than current proposal. Use state-owned land even if that requires cancelling agricultural leases and/or revive eminent domain. There are far more businesses, livelihoods, families and economics negatively impacted from the discharges than there are farmers & agri-workers in the EAA. Those in the EAA impacted by expanded reservoir should be assisted in relocation & job training.	As part of the Section 203 process, the Corps cannot at this point add additional analysis or alternatives to the report, as is suggested in your comment regarding assistance to relocating and job training of displaced agricultural workers from the EAA.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
Robert Gibbons	Subject: Reservoir should be at least TWICE as large as & deeper than currently proposed. We need the discharges stopped 100%, except for emergencies after hurricanes. There are many more businesses and livelihoods at risk on both coasts than are employed in the Everglades Agri-Area. I recommend relocating farming families who may be impacted and assisting them with new job training, etc.	Please see response to Mr. Robert Gibbon's first comment.
Scott Rexroat Treble Hook	Subject: Everglades Agricultural Area Best I can explain…. Welcome to Florida! Watch out for deadly sharks, snakes, and Gators. Know worries! Most of the Florida Black Bears, and most all of the Panthers have been forever lost to uncontrolled Devil-lopers and greased poly-contritions. And that's just the tip of the wastewater treatment pond they call the 4th largest lake in the USA, LAKE OCHEECHOBEE!	Thank you for your comment
Shirley Harris	Subject: Florida Dike I think you should NEVER have built the dike in the first place. It has caused problems for years and now people live all around Lake Okeechobee. You have created a monster problem and now want money to fix it. You should take the funds to fix your problems out of your budget.	Thank you for your comment.
Mike D. Brown	Subject: Lake O Reservoir I want you to stop sending Lake O waters into the IRL and into the Gulf and never send it there again. I want you to send lake O water through marshes to clean contaminants out of the water and down into the Everglades. I want you to begin doing this as quickly as possible. Thank you.	The Corps and SFWMD are working towards reducing discharges to the estuaries and sending water south to the Everglades through the ongoing CERP projects. The plan proposed by the SFWMD section 203 study entitled if approved by the Corps would be recommended as a project for Congress to consider authorizing a change to the Central Everglades Planning Project (one such grouping of CERP projects)
John Lumley	Subject: Lake Okeechobee Water The real solution is Emminent Domain by the state and open a corridor for Lake O water to head to Florida bay as it did in the past.	Thank you for your invitation. The Corps and SFWMD are working within their means and applicable laws to achieve restoration to the Everglades.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	The sugar and agricultural companies have blocked the natural flow to Florida Bay from Lake O. I invite u to come and fly with me and look at the problem from the air. Free. I have a flight school and fly over the area constantly. The Corps of Engineers has a history of BAD Plans including the Kissimmee River debacle of years past. Open up a path to Florida Bay as it is a logical solution. I imagine Palm Beach Commissioners or other political hacks own the land u want to put the reservoir on! Lots of MONEY to be made from selling the fill dug out for the reservoir as well. More of the same. DO IT RIGHT THIS TIME. Restore the water flow to Florida bay.	
John Lumley	Subject: Reservoir Planning Let's do the math. How many cubic feet of dirt will be dug out of the 10,100 acre by 23 feet deep? Are you going to sell the dirt to pay for the machinery and labor to dig this big hole? The past price for a situation like this is fifty cents .50 cents per yard paid to the land owner and the excavation company comes, digs, takes the dirt and pays the owner. Check with Clyde Dawson at Indiantown, FL as he has done this with the State for new highway construction fill. However, the real solution is to let the water flow South to the Florida Bay the way Nature made it. Open a channel South of the lake to allow water to flow South. It appears that the Sugar Companies have tremendous political sway in Washington due to their large donations and Lobbyists. Big sugar, Big money= Everglades and Mother Nature suffers. The Big Sugar is paying for prime time ads regarding their NON pollution of the water which is hard to believe with the crop spraying and chemicals applied as fertilizers, etc. I fly for a living and have to deal with the HUGE clouds of smoke while they burn the sugar cane and other growing lands. You have to see to believe. Big sugar blames the property owners that are in Orlando and along the Kissimmee River for the pollution they are spewing off their farmland. Somebody needs to fight for the Everglades and restore the natural flow of water to Florida Bay.	The Corps and SFWMD are working within their means and applicable laws to achieve restoration to the Everglades.
Jay Defrank	Subject: Request for public input on EAA Reservoir Plan This email is in response to the Army Corps' request for public input. We live on Hutchinson Island in Stuart. We know first hand the damages discharges from Lake	Your support for the project is noted.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	Okeechobee do to our waterways, our overall environment, our economy and our quality of life. It is crucial to those of us who live along St Lucie Inlet and the Indian River Lagoon that the EAA reservoir plan delivers what it promises: 370,000 acre-feet of clean water sent south to Florida Bay, and not discharged into our rivers. Thank you.	
Patricia Noonan	Subject: Reservoir Plan Even though it is not enough to clean up the water that surrounds our homes here, I want to voice my support for the reservoir plan. We still will get discharges into the St. Lucie River, the oysters will still die and have to be reintroduced regularly, and we still will get warnings to stay out of the water in certain areas. But it is a start and something that we can build upon in the future.	Your support for the project is noted.
Richard Persson	Subject: Reservoir Important consideration should be given to the sportsmen in the reservoir. A littoral area should be included in the plans in order for fish to spawn, and a boat ramp should be included in any plans. Any reservoir can serve a dual purpose such as water storage, and a good sustainable fishery can be maintained. This will also bring a boost to the economy in the area.	As part of the Section 203 process, the Corps cannot at this point add additional analysis or alternatives to the SFWMD report, as is suggested by your comment to add littoral areas to reservoir. Recreational opportunities and public access were considered in the development of the project and are discussed in Section 6.1.5 of the SFWMD Section 203 report. A boat ramp is included in the reservoir as part of the recreation plan for public access. However, littoral areas are not feasible to implement in reservoirs for a few reasons; (1) dam safety concerns, (2) impacts to littoral zones by fluctuations in water depths, and (3) resulting impacts to wildlife utilizing the littoral areas (such has nesting birds) as a result of the fluctuating water levels. A number of recreational activities will be available to the public in the proposed stormwater treatment area such as fishing, hunting, wildlife viewing, hiking, etc.
David Kapell	Subject: SFWMD proposal for EAA storage reservoir I support this plan, as opposed to doing nothing at all, which is what has been happening for far too long. However, I do not believe the project is good enough. It is just better than nothing. The SFWMD is in the pocket of the sugar industry, which does not want any reduction in their farming. The SGWMD asserts that they could not build a larger reservoir, because	Your support for the project is noted.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	nobody was willing to see any land. This is a specious argument, since the sugar industry uses public land in addition to private land. In order to build a larger reservoir, it is only necessary is to restrict their use of public land for farming. We would not have to purchase any land. The SFWMD is misleading the public for the benefit of their friends in the sugar industry.	
Carmen Guido	Subject: Reservoir Are we really solving the problem or supporting the bribes our politicians are receiving. Seems like 10 years ago I voted to correct this problem but all I read about is the money given by big sugar to certain politicians.	The Corps and the SFWMD are working within our means and applicable laws to restore freshwater flows to the Everglades and reduce flows to the northern estuaries.
Andrew C. 'Jack' Diehls lll	Subject: Lake O Reservoir This is a multi faceted problem, but the reservoir is at least one step in the right direction. I hope it can be done, along with so many other things need to save this amazing little corner of God's creation with it's fragile waterways.	Your support for the project is noted.
William Lain	Subject: Reservoir I view the proposed reservoir as a very positive step in the right direction. It is not a complete perfect solution but it appears to be a substantial part of one. History shows it may not be best to effect what we think is a perfect solution all at once anyway. We once thought draining Okeechobee through the Saint Lucie and Caloosahatchee was a great idea. Given where we are now the proposed reservoir appears to be a very good experiment.	Your support for the project is noted.
Frank Taube	Subject: Lake O Discharges My wife and I fully support the efforts of the Army Corps efforts to reduce the discharges from Lake Okeechobee and improve clean water flow to the everglades. We believe the people that work for the Corps have invested their life's work to improve the environment and human interaction with it to protect our planet. And your plan to build a retaining lake to settle and filter the water to direct it to where it is needed in the everglades is supported by my wife and me. We have the opportunity to see the Atlantic just north of the St Lucie inlet and can see the vast improvement of the water quality with the reduced discharges in 2018. The ocean is blue again and the fish have begun to return. If we can reduce the number of discharges in a wet season the water quality will improve greatly. If we build this basin and give the water a place to go, it will return Florida to its natural state.	Your support for the project is noted.
Joanne Heroy-Giller	Subject: A vote of support for SFWMD March 26th plan	Your support for the project is noted.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	Plz. make this happen to help protect our vital Caloosahatchee! Thank you for your consideration.	
David J. Carlson DVM	Subject: EAA Reservoir I am a practicing veterinarian who has been living on the North Fork of the St. Lucie River for over 15 years. I also work as a volunteer for the Florida Oceanographic Society testing water in the river on a weekly basis. The dramatic decline in sea grass, marine life and water quality that occurs when Lake Okeechobee is discharged east and west is profound. The proposed 10,100 acre reservoir and 6,500 acre STA are a step in the right direction to curtail necessary discharges to the estuaries. The South Florida Water Management has done extensive modeling on this plan and I have confidence in their science, however, I believe there needs to be some accountability and an expanded plan should it be needed if reality does not match the model. I am disappointed more public land is not being taken out of production and used to increase the size of the reservoir and decrease the depth. The goal of this project must be to convey, store, and clean water to move south and not comingled with agricultural demands for flood control and irrigation. The foundation of my background started in the dairy industry. I believe that agriculture and the environment can coexist but history has proven many mistakes have been made and we need to rectify these and future negative impacts to save the planet. Animal sentinels are shouting alerts as we discover sickness and death in places like the Indian River Lagoon and even the ocean. Protecting people and animals from lethal cyanotoxins must be given a high priority. The water from Lake Okeechobee is needed south of the lake and must be cleansed of its harmful nutrients. The proposed project as well as other storage and cleaning efforts around the lake will have a huge impact towards reaching the goal of a more balanced ecosystem.	As part of the Section 203 process, the Corps cannot at this point add additional analysis or alternatives to the report. The project area is the same as it was for the authorized CEPP. The Corps and the SFWMD are working within our means and applicable laws to restore freshwater flows to the Everglades and reduce flows to the northern estuaries. CERP is being implemented as part of an adaptive management approach that recommends changes to plan and project implementations to further improve performance towards ecosystem restoration goals based on science-based monitoring feedback.
Damon Hickey	Subject: Lake Okeechobee reservoir My wife and I were privileged on a recent visit to southwest Florida to take a short cruise with the Sanibel-Captiva Conservation Foundation (SCCF) into some of the oxbows along the Caloosahatchee River, in order to understand better the ecology of the river and its relationship to Lake Okeechobee. As a result of what we learned, we are writing in support of the construction of the proposed Lake Okeechobee reservoir, in order to reduce harmful discharges into the Caloosahatchee River. As you know, excessive amounts of fresh water flowing into the river severely impact the coastal and marine environment downstream, and while the reservoir may not be the perfect solution, it is a big step in the right direction. We strongly support its construction.	Your support for the project is noted.

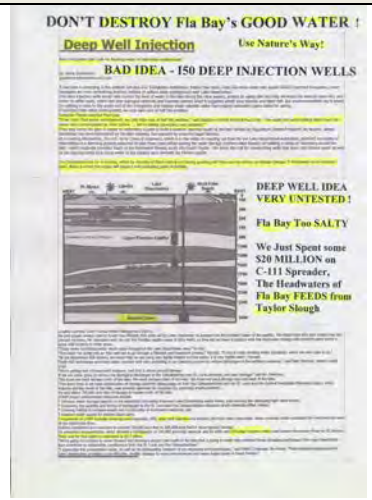
COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
Andrea Stewart	Subject: Reservoir Let's be clear about the 7 - 9 year wait for ANY reservoir to be built --- if the Lake O discharges continue, even on a limited basis, there will not be any living creatures left in our beautiful waters. We MUST STOP DUMPING algae ridden, harmful run-off, etc. into ANY estuary, river, canal, etc. I believe the reservoir needs to be larger in order to almost eliminate the need for harmful discharges that kill the beauty of our environment. This has taken far too long to resolve. Our waters are a precious natural resource; let's save our home.	As part of the Section 203 process, the Corps cannot at this point add additional analysis or alternatives to the report, as is suggested. The project area is the same as it was for the authorized CEPP. The Corps and the SFWMD are working within our means and applicable laws to restore freshwater flows to the Everglades and reduce flows to the northern estuaries.
Abe Levy	Subject: EAA Reservoir I am writing to support strongly the construction of the EAA reservoir. While I would prefer a much larger and shallower wetland, rather than an over 20-feet deep reservoir, I am grateful for this very modest step in the right direction of moving water southward from Lake Okeechobee into an EAA and from there southward into the Everglades. Thank you for anything you can do to expedite the construction of this reservoir. **RESPONDER: WILLIAM MITSCH** Subject: Re: EAA Reservoir Abe and Pat, I am less enthusiastic because water quality plan is inadequate and swept under rug just to encumber $2 billion. I am writing piece now for ACOE request on behalf of Friends of Everglades. Might be able to show you draft by Friday. When do you comment? Can u wait till then? Bill	Your support for the project is noted.
Bill Goodman	Subject: Everglades Agricultural Area (EAA) Storage Reservoir The EAA sounds like a good start toward resolving the water problems surrounding Lake O and the harmful discharges into the Caloosahatchee River basin.	Your support for the project is noted.
Sharon Smith Purdy	Subject: Lake O Discharge Please, please, please, approve the plan to change the runoff from Lake O....there are so many negative, environmental impacts occurring with current status quo. All who have the influence and power to make a change must make that change happen now!	Your support for the project is noted.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	Please be part of the solution. Happy Earth Day...May we all learn to better respect this planet....	
Jim I. Kelley	Subject: Lake O I spend about 4 months a year on Sanibel and do a lot of fishing. I believe that the water coming from Lake Okeechobee is hurting the water quality and fishing in our area. It seems to me that our government is supporting higher sugar prices for US citizens and helping to create a bad situation for our water quality in FL. I also believe that there are a lot of environmentalists who for some reason believe that the water from Lake O is too dirty to be sent through the everglades but not too dirty to send to us. The everglades needs more fresh water we need less. The natural flow of water would be to allow it to go through the everglades. The only reasons that we are getting too much fresh water and the everglades is not getting enough are created by special interests and bad government. The best two solutions would be to stop creating advantages for the Big Sugar industry and allow the fresh water overflow from Lake O to go naturally through the everglades. I know that that is an over simplification but it is the truth. If there is anything that the Corps can do to help solve this man made bad situation it would be greatly appreciated.	The Corps and the SFWMD are working within our means and applicable laws to restore freshwater flows to the Everglades and reduce flows to the northern estuaries.
Donald Minor	Subject: Lake Ockeeb Hope youse all vote to let ponds to catch water discharges from lake start. It would be nice to have this as first step in many need to keep fowl water out of St Lucie River waters and let area recover from prolong harmful discharges. Looking forward to return to natural flow to Everglades. thanks Don Minor Stuart fl.	Thanks for your comment.
Ginger Goepper	Subject: Protect our Florida Environmental from Harmful Pollutants I am writing to support the Army Corp of Engineers' efforts to protect Florida's environment from the harmful pollutants in Okeechobee Lake discharges: * 23-foot-deep, 10,100-acre reservoir to store up to 78.2 billion gallons of excess lake water * 6,500-acre man-made marsh to clean the water When used in conjunction with other existing and planned projects, I believe this will reduce the number of damaging discharge events from Lake Okeechobee to the St. Lucie and Caloosahatchee rivers by 63 percent and send an average of about 120.6 billion gallons of clean water south to the Everglades and Florida Bay.	Your support for the project is noted.
Mary Shabbott	Subject: Protect What Little Florida Has Left	Your support for the project is noted.

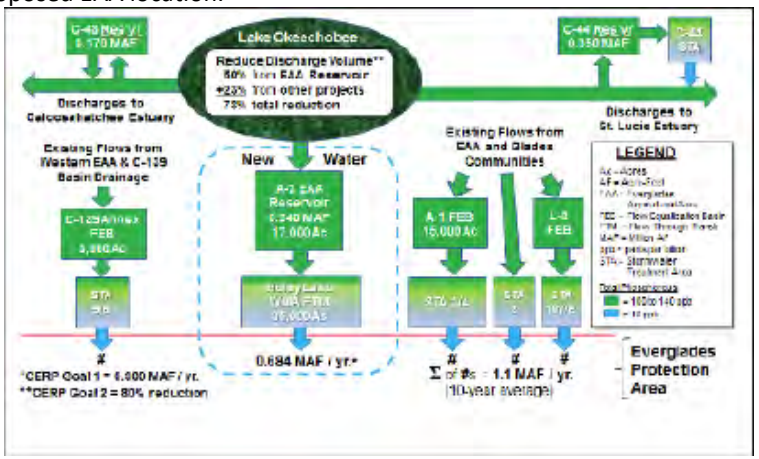
COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	I am writing to support the Army Corp of Engineers' efforts to protect Florida's environment from the harmful pollutants in Okeechobee Lake discharges: 23-foot-deep, 10,100-acre reservoir to store up to 78.2 billion gallons of excess lake water 6,500-acre man-made marsh to clean the water When used in conjunction with other existing and planned projects, I believe this will reduce the number of damaging discharge events from Lake Okeechobee to the St. Lucie and Caloosahatchee rivers by 63 percent and send an average of about 120.6 billion gallons of clean water south to the Everglades and Florida Bay.	
David A. Urich	Subject: Need for INCREASED flow from EAA Reservoir under Tamiami Trail to Taylor Slough for Fla Bay – NOW! While I am in full agreement with the SFWMD's EAA storage reservoir, there is a REAL problem with the need for INCREASED Flow to the South! Currently, while we have one bridge of a MILE in length, and a NEW 2.6 mile one under construction - there appear to be not REAL plans for INCREASED flow to the South, via Taylor Slough to Fla Bay - NOW! Most of the year, the WCAs (Water Conservation Areas) are full and not able to receive water from the new EAA storage reservoir! That will greatly impact the ability to have normal flow through the whole system. It seems that constraints to flow under the Tamiami Trail are imposed due to the Cape Sable Seaside Sparrow's nesting periods as well as some attempts to keep water from the Las Palmas 8.5 mile "agricultural" area created some time ago in the actual Everglades. Both of these issues need to be studied and corrective actions taken to insure that the NEW EAA Reservoir is able to have a meaningful flow in the entire system South of the WCAs. Otherwise, no meaningful flow will go through the Taylor Slough to Fla Bay! Rainwater alone will not restore the salinity balance needed for Fla Bay!	The Corps and the SFWMD are working within our means and applicable laws to restore freshwater flows to the Everglades and reduce flows to the northern estuaries.
David A. Urich	Subject: PULL the PLUG – SEND Water to FL Bay, NOW! In response to Chad Gillis' good News-Press article of 4/29/18 regarding DIW (/Deep Injection Wells) I have to raise my voice again to declare that DIW is just a BAD idea! The TRUE problems are CONSTRAINTS on REAL FLOW under the one mile Tamiaimi Trail Bridge and the LACK of a PLAN for an INCREASED Flow for the about to be completed NEW 2.6 mile Bridge! Because of these constraints - the WCAs (Water Conservation Areas) remain FULL in the wet season, thus backing up the WHOLE flow system! Flow is thus constrained from Lake "O" causing it to rise to dangerous levels! THAT is why massive discharges have been sent down BOTH rivers!	Thank you for your comment. This Draft EIS will focus on evaluating effects of the proposed plan identified in the SFWMD section 203 study, and will not include any additional alternatives or features.

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	Originally the SFWMD plan called for some 150 such DIW installations - this has now been reduced to a MERE 50! This REDUCED plan will cost some $330 MILLION - for planning, permitting & construction, with some $10 Million in annual operating costs! What about the geological danger of 50 such wells in such a small geological area? Could they possibly create a "Swiss Cheese" danger zone of potential collapse of the aquifer? Not to mention that the proposed DIWs are to be operated on an "as needed" basis and will thus be DRY for most of the year! Has anyone studied potential STRUCTURAL weakness due to lack of usage? Other such wells are in CONSTANT use, and are NEVER normally left DRY! They ALSO are widely spread around the State of Fla, not so MANY in one area! Most of the year, the WCAs (Water Conservation Areas) are FULL and thus will not be able to receive water from the new EAA proposed storage reservoir! That fact continues to greatly impact the whole Lake "O" system's ability to have anything resembling normal flow down to Fla Bay! It seems that constraints to REAL flow under the Tamiami Trail Bridge are imposed due to the Cape Sable Seaside Sparrow's nesting period in the wet portion of the year - as well as some attempts to keep water from the Las Palmas 8.5 mile "agricultural" area created some time ago in the actual Everglades. Yet we are about to finish a NEW 2.6 mile bridge with no apparent plan to INCREASE needed FLOW! Current Everglades restoration plans will reduce the amount of harmful Lake "O" discharges by about 61 percent, it is reported. It seems that trying to get that up to 77 percent is probable OVERKILL! The same money spent to deal with the Tamiami Trail constraints would be ELIGIBLE for FEDERAL match, and would ALSO help save Fla Bay, NOW! Instead of DISPOSAL of this good water - the SFWMD should join with the Army Corps to DEAL with the South Constraints and lack of capacity in the system, NOW! Let's SAVE this water and get it to where it is needed to SAVE FLA BAY! We have spent some $12 Million on the C-111 Spreader project, yet this essential path to Fla Bay via Taylor Slough is NOT operating at design capacity! Why NOT?? All of these complex issues need to be studied and corrective actions taken to insure that the NEW EAA Reservoir will be able to have a meaningful flow to the entire system South of the WCAs, NOW! The water that has been "going to tide" should NOT be disposed of via DIW - it is NEEDED in the system, NOW! Rainwater alone can NOT restore the salinity balance in Fla Bay!	

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	David A. Urich, Life Member of the Responsible Growth Management Coalition, Inc. and the SFL Clean Water Movement, My email is: d.urich@comcast.net and my cell is (239) 850-2413 PS: I have attached some four graphs that I have made which help show these concepts, also a file picture of myself if needed. **- ATTACHMENTS: -** 	

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
		
Lin Childress	Subject: Reservoir to help cut Lake Okeechobee discharges To whom it may be concerned: We are adamantly in favor of building the reservoir south of Lake Okeechobee in order to reduce lake discharges into the St. Lucie River and the Caloosahatchee River. Such discharges are destroying our estuary along with all of the wildlife, destroying waterfront homes, jobs, etc. We ask for your support for this project to start and be completed as soon as possible. Thanks very much.	Your support for the project is noted.
Claudia Burns	Subject: Reservoir The proposed Lake Okeechobee reservoir has the potential to reduce harmful discharges into the Caloosahatchee River by 40 to 60 percent. Every resident of Southwest Florida, including myself, would like to see that happen. Thank you - Claudia Burns, Sanibel resident, Florida voter	Thank you for your comment.
Joseph Gilio, PWS Emeritus	Subject: Environmental Review of State's [Florida] EAA Reservoir Study Dear Ms. Auvenshine, I have attached a letter re: above subject. Much of the information developed therein was in coordination of Dr. Jay O'Laughlin, Ph.D. . That said, Dr. O'Laughlin is not a participant in this letter and as such any errors and omissions developed herein in conjunction with our original joint white paper, also attached, are all mine.	The Corps and SFWMD are committed to implementing CERP within applicable means and laws. CERP is being implemented by using adaptive management principles that requires monitoring of ecosystem restoration performance to inform the need for adjustments

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	Original O'Laughlin and Gilio white paper on "outside the box" options for the EAA Project/STA Project To: USACE From: Joseph L. Gilio, PWS Emeritus Date : April 30, 2018 Item: Critique of SFWMD's Project G of CERP Much of this critique is under the ability of the State of Florida and its lead agency the South Florida Water Management District [SFWMD] to rectify. I verbally submitted brief remarks pertaining to these shortcomings at the public hearing of the SFWMD board on March 8, 2018. There are three shortcomings and a new chemical train concept that could be added to the design of the reservoir project, all combined potentially reducing northern estuary discharges to annual flows amendable to major possibly full recovery of the severely impacted estuaries and the input rivers. <u>The submitted reservoir concept</u> SFWMD's submittal to the USACE for a new reservoir of 240,000 acre-feet [AF] on 10,100 acres of A-2 parcel and 6,500 acres of storm water treatment area [STA] proposes to convey 350,000 AF/yr. of Lake Okeechobee water south into the Everglades Protection boundary [EPA] and eventually flow into the Everglades National Park [ENP] and thence Florida Bay. This concept will utilize both a new 6,500-acre STA and the adjacent functioning STA's ¾ as water treatment flowways in order to meet the 350,000 AF/ yr. objective. CERP's Goal 1 of moving 300,000 MAF lake Okeechobee water would be achieved. This objective while commendable lacks restitution of full lake volume flow into the remnant Everglades and Florida Bay. <u>Shortcoming # 1- Lack of full volume flow from lake to Everglades</u> Over the past decade, FEB A-1 and STA's ¾ have processed approximately 1.1 million AF/yr. of Everglades Agricultural Area [EAA] farmlands and lake communities stormwater runoff with minimal treatment of Lake Okeechobee waters. The [EAA + lakeside communities /Lake Okeechobee] ratio has been about 9/1 leading to probable future use conflicts between existing and this proposal's increased use. Alternatively, use of STA ¾ for EAA reservoir treatment may be curtailed and fall short of CERP goal 1 of moving 300,000 MAF at 10 ppb TP Annual geometric Mean [AGM] into the EPA. <u>Shortcoming # 2 -- Lack of Full volume attainment Flow to the remnant Everglades</u>	to improve ecosystem restoration plan performance. Planning efforts are also currently underway for the Lake Okeechobee Watershed (LOW) Project and the Western Eveglades Restoration Project (WERP). The preliminary project area, where the placement of features will be considered, covers a large portion of the Lake Okeechobee watershed north of the lake. LOW aims to improve the quantity, quality, timing and distribution of water entering Lake Okeechobee; provide for better management of lake water levels; reduce high-volume discharges to the Caloosahatchee and St. Lucie estuaries downstream of the lake; and improve system wide operational flexibility. Both of these efforts will provide opportunities for storage both north and southwest of the lake. WERP and LOW were identified in the recent Integrated Delivery Schedule (IDS) update and will focus on areas that will complement ongoing restoration efforts to the east of the lake (*i.e.* Indian River Lagoon South Project (C-44 Reservoir)), west of the lake (*i.e.* Caloosahatchee (C-34) West Basin Storage Reservoir) and south of the lake (*i.e.* Central Everglades Planning Project (CEPP)).

COMMENTER	AGENCY/PUBLIC COMMENT SUMMARY	CORPS RESPONSE
	The annual 35 yr. mean inflow water into Lake Okeechobee from north, east and west is about 2.5 MAF/yr. Assuming a 70% Everglades areal remnant, then about 1.8 MAF/yr. would approximate annual full water volume inputs into the EPA. However, past decadal inflow of 1.1 MAF and 350,000 AF [this reservoir project] equals 1.4 MAF or 0.4 MAF less than full historical inflow. And if FEB A-1 & STA ¾ prioritization conflicts occur, the EAA reservoir project may only attain about half of its goal or 200,000 AF/yr. further decreasing full volume restoration by 0.5 MAF annually. <u>Shortcoming # 3 - State land capacity not fully realized</u> SFWMD's concept design is intended to stop Lake Okeechobee's discharges to the Caloosahatchee River and estuary [CR&E] by 55 % volume and major discharge events by 63 %. O'Laughlin and Gilio's 2018 white paper [attached] proposed two options for expanded CERP Project G's EAA reservoir water treatment on State of Florida owned Holleyland's 35,000 ac. and Rotenberger's 25,000 ac. Both are ideally situated adjacent to SFWMD's proposed EAA location.  Using Holleyland alone for an STA would increase Lake Okeechobee's flow south into the EPA from 33% to 50% [360,000 AF to 672,000 AF] or a 66% gain with no additional land purchase. Adding other CERP & CEPP projects would increase that flow to 76% with concomitant decreases in volume and discharge events to the northern estuaries. If both tracts were combined, the 64,000-ac. treatment could increase the Lake Okeechobee flow south up to 1,20,000 AF, a 330% increase and decrease northern estuary discharges by up to 92%. At this level of discharge volume, there would be a very high probability of full northern estuary recovery.	

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	Holleyland is more amendable to timely inclusion as it lacks roughly 40 parcels of privately owned parcels within Rothenberger. Noteworthy, is that both tracts were fully functional components of the sawgrass dominated slough, island troughs of the historical Everglades and their management plans call for Everglades restoration. The outflow of the new reservoir into part of the Holleyland tract for water quality treatment to achieve federal 10 ppb TP annual geometric mean [AGM] prior to entry into the Everglades Protection area [EPA] would turn about a third of Holleyland [10,000 ac.] into an STA. The remainder 25,000 ac. [70%] could be restored to full Everglades form and function, a goal not included in CERP or CEPP. STA's have proven to have some Everglades restorative value even though water quality levels are above Federal standards. <u>Enhancement of water quality for the concept G project through chemical trains</u> A sequential TP reduction train composed of expansion of the existing marsh at the southern edge of Lake Okeechobee, an over the top of bank adjustable weir as inflow into the Miami canal, a limestone rip rap cascade from the weir prior to canal entry, an emergent aquatic planting [EAV] on a 5/1 [H/V] edge, a 14 foot deep EAA reservoir with H/V ranges from 4/1 to 10/1 planted with EAV an submergent aquatic vegetation [SAV] , 10,000 ac. of STA designed to be removed of vegetation and sediment periodically and the remainder 25,000 ac. restored as a Flow Thru Marsh [FTM] as a mimic of its historical form and function.	

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	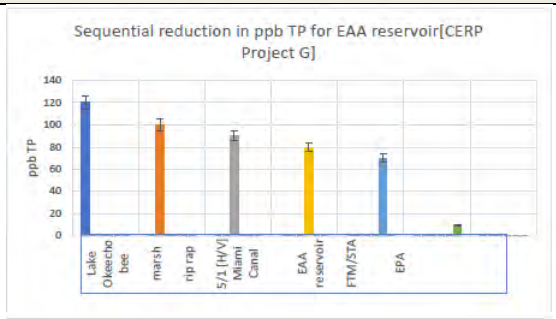 Will a 55% water volume reduction and 63% major discharge events allow northern estuarine past form and functions It is conjecture at this point in our knowledge to determine what overall volume reductions and percentage historical discharge events would either allow natural processes to oxidize the millions of tons of anaerobic muck that has settled in the CR&E and SLR&E ecosystems or whether man's intervention will be needed to restore the hard bottomed, seagrass dominated estuaries and tapegrass rivers they were prior to Lake Okeechobee discharges that started a century ago. Certainly, the greater the volume and frequency of Lake Okeechobee flow south rather than into the northern estuaries, the greater the probability of natural or man-induced restoration. Economic Impacts Various organizations both NGO's and government have estimated the economic benefits or the negative impacts from past and current discharges of Lake Okeechobee waters into the northern estuary. These economic impacts in recovery are a direct function of the volume reduction and major discharge frequencies to the northern estuaries. The greater the flow south into the EPA and its concomitant reduction to the northern estuaries, the greater the realization of full potential economic values that these norther rivers and estuaries formerly provided. Missing is a full increase of lost ecosystem values provided by seagrass and hard bottomed communities. Some of these positive and negative economic estimates are: Lost market value for residences [especially river frontage] in Martin, St. Lucie and Lee counties –estimate $ 1 Billion dollars. Lost mortgage doc stamps revenue on lower sales prices. Lost water borne activities -boating, fishing, recreational use restrictions. TCRPC estimates $1.1 Billion in total value from the Indian river Lagoon portions of St. Lucie and Martin Counties for 2014. This estimate does not include the St. Lucie River portion of these two	

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	counties. The $1.1 Billion revenue stream was severely impacted during the 1998-99, 2015-2016 Lake Okeechobee discharges. Lost seasonal rentals due to Microcystis bloom occurrences. What %volume decrease to northern estuaries is needed to eliminate toxic bloom occurrences in the receiving estuaries and rivers. Lost ecological value of the southern IRL where over 800 different fish species had been identifies as using some portion of that area for all or some of their life functions. <u>Summary</u> The major critique of the SFWMD's Concept G' EAA reservoir is that it will store and treat less Lake Okeechobee waters than possible in two areas: • It reduces discharges to the northern Caloosahatchee and St. Lucie River ecosystems by 55% volume when the potential for 76% even 92% reductions are possible using existing state owned Holleyland and Rotenberger tracts. • The SFWMD proposal fails to meet Goal II of full water volume south into the EPA for remnant Everglades and Florida Bay restoration. • How much economic, human & non-human health conditions and ecological restoration will be lost, quite possibly forever, if only 55% volume reduction and 63%major discharges are accomplished through implementation of Concept G reservoir as currently presented to the USACE. 1. Best EAA-res-analysis_1-2 : **"Outside the Box"1 Options for the EAA Reservoir/STA Project** by Jay O'Laughlin, Ph.D.2 and Joseph L. Gilio3, 4 January 22, 2018 (revised from January 4, 2018) • Florida Senate President Joe Negron said he wanted "state engineers to think outside the box and outside the 'footprint' they're considering for a reservoir south of Lake Okeechobee" (interview in TCPalm, December 14, 2017, emphasis added). As yet South Florida Water Management District (SFWMD) engineers have not done so. • Jay O'Laughlin, Ph.D., is Professor Emeritus and Director Emeritus, Policy Analysis Group, College of Natural Resources, University of Idaho. He lives in Hobe Sound adjacent to the Indian River Lagoon, and writes water policy analyses*	

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	for The Guardians of Martin County, a 501(c)3 organization committed to educating Martin County residents about balanced use of natural and man-made resources. Contact: jayo@uidaho.edu • Joseph L. Gilio is a Professional Wetlands Scientist Emeritus, with 40 years of experience designing and maintaining constructed wetlands and lakes achieving TMDL for total phosphorous. He lives in Palm City on the South Fork of the St. Lucie River. Contact: www.jlgilio.com • The authors acknowledge with thanks help from Gary Goforth, P.E., Ph.D., consulting water resources engineer in Stuart, Florida, with 35 years of experience including design, construction, and operation of 41,000 acres of constructed wetlands. Contact: www.garygoforth.net • For example, "Florida's Future Water Supply Depends on Improved Surface Water Management" (December 2016) and "Arguments Against the EAA Reservoir and Rebuttals" (April 2017). These documents can be read or downloaded at, respectively: http://theguardiansofmartincounty.com/wp-content/uploads/2016/12/GMC_Water_Position.pdf http://theguardiansofmartincounty.com/wp-content/uploads/2017/04/arguments-rebuttals_EAA-reservoir_JayOL_04-16-2017.pdf	
Ed Fielding Martin County Board of Commissioners	Subject: Reservoir Members of my family were school teachers in Moore Haven area during 1926 hurricane. I have had a lifetime observing the various projects of the Army Corps and so have skeptical hope as we fling out on a new mission of salvation for the Everglades. Often we do a lot of stuff (spend money) with only modest resultant benefit for the patient. We may do no better this time, but I hope we at least catalog our objectives, establishing metric to determine how we are doing and even which way we are going. A. OBJECTIVES 1. for Lake, the list to accomplish restoration would be overwhelming, but the modest list for water control as affecting the estuaries and releasing water SOUTH may be within the range of being doable.	Thank you for your comment. This Draft EIS will focus on evaluating effects of the proposed plan identified in the SFWMD section 203 study, and will not include any additional alternatives or features. The SFWMD Section 203 Report recognizes that this proposed project is an increment towards achieving ecosystem restoration goals envisioned to be addressed by full CERP implementation of 68 project components.

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	a. Unfortunately the most effective way to address Lake levels, through significant increase of storage in the upper Okeechobee basin, has been thwarted in the LOW Project Plan. b. If our objective were to eliminate estuary discharge rather than just make unfounded and totally unsupportable claims about percentage improvement in decreased volume of releases there would be more hope. So should we get a Harvey instead of an Irma it is just a freak of nature; no lack of planning here. c. To eliminate releases to the St. Lucie estuary we need sufficient capacity to discharge to the South, clean water to meet quality standards and conveyance to move the water into areas of need and storage areas, reservoir(s), and procedures and policies to move Lake water before EAA drainage fills all the available canals. 2. To release water SOUTH: a. Conveyance, b. Sufficient water quality, c. Movement ahead of EAA drainage. 3. Accumulate in the reservoir via some cleaning process. 4. This additional water to be available for: Park, Tribes, Florida Bay, Key Biscayne, Shark River Slough, etc (i.e. the environment). B. MEASURE ACHIEVEMENT OF OBJECTIVES C. PROBLEMS 1. Reliance on outdated weather model; Harvey would have breached the dike, yet we still plan on Irma being the unique storm event; 2. With heavy rain fall still rely on releases to estuary as only outlets with sufficient capacity and lack of water quality standards. 3. EAA releases plug up pathway to getting Lake water releases into reservoir. 4. How to get clean water into reservoir? 5. How to get clean water to Park, Florida Bay, etc? 6. Establish a measuring system so we know when we are and are not meeting expectations at various points along the projected flow pathway. 7. We are not planning sufficiently for water retention in Okeechobee basin nor in chain of Lakes.	
Richard C. McGeough	Subject: Lake Okeechobee Time to Use Some COMMON SENSE 4/30/2018 COMMON SENSE Tells US that the Solutions are not Too Difficult i.e. Lake Okeechobee is polluting the ST. Lucie and Caloosahatchee Estuaries. This Polluted Water is going to end up in the Atlantic Ocean anyway, So Why not build a Pipeline from the C-44 Canal to	Thank you for your comments. The Corps and the SFWMD are working within our means and applicable laws to restore freshwater flows to

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	the ocean and send the polluted water to the ocean . If this water is Dispensed through a Christmas tree it will be Cooled and at Specific Gravity Of 1.0 will rise to the top while mixing with the 1.2 Specific Gravity ocean water. This will help in the Global Warming Problem. New York City Dumps their Garbage in the Ocean, and the Amazon River dumps at least 5 Lake O's everyday in the Ocean, so EPA should not be a Problem. As For Cleaning the Water Going to the Everglades. Lake Okeechobee is one of the Bigger Filters in the World. And Though Everyone CLEANS or Replaces Their Air Conditioner Filter, Replaces their Refridgerators/ Feezer Water Filter for Ice cubes and Drinking Water, And replaces Vacuum Cleaner Filter. NO ONE EVER CLEANS THE LAKE OKEECHOBEE FILTER. The Solution Could Be: Get One or Two Of The Humongous Fertilizer Companies To Filter All The Water Leaving Lake Okeechobee. While Doing this You Could use Maybe 4 SOLAR POWERED GPS CONTROLLED BARGES with several Propellers To Stir up The Phosphorous Sediment, and direct it South. every day 24/7 There would be less Sediment Collected until finally the Fertilizer Companies will go home. and Everyone lived Happily Ever After.	the Everglades and reduce flows to the northern estuaries.
Florence Chatowsky	Subject: St Lucie River Science and the St. Lucie An estuary is defined as a body of water having a freshwater inflow at one end that mixes with saltwater providing a low salinity gradient (brackish water) that connects with the ocean at the other end and is subject to tidal flows. It is not a bay. It is not a river. The St. Lucie River is an estuary. It had fresh water running into it from its upper north and south forks, drainage creeks, and historically above and underground sheet flow water moving in from the west. The lower salinity water of an estuary is important as a nursery for fish such as mullet, redfish, mangrove snapper, snook; also for shrimp, oysters, blue crabs, and other inshore creatures. When I moved to our home on the St. Lucie estuary 26 years ago water was being released into it from Lake Okeechobee via the St. Lucie locks in low volume pulse releases. I could tell when the water was being released because the fishing improved especially the snook bite. Snook like to feed in moving water and would swim up to the inflowing water at the locks to feed on the mullet that also move into fresh water to feed on vegetation. At the C-23 canal in Palm City that runs into the St Lucie, the fishing is always better when fresh water is flowing over t he dam. There is even a fish pier built below the dam for that reason. During the pulse releases of the early 1990's the fishing in the St. Lucie was very good. Every winter schools of bluefish, Spanish mackerel, and jacks would feed at channel marker 19 and off the Martin Memorial Hospital shore. The dark water did not bother	Thank you for your comments. The Corps and the SFWMD are working within our means and applicable laws to restore freshwater flows to the Everglades and reduce flows to the northern estuaries.

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	the fish at all. In fact, most of the fish that inhabit the St. Lucie can live in fresh water. Mullet, snook, and tarpon have been caught in Lake O. Go to Homasassa Springs and see sheepshead, redfish, tarpon, jacks, mullet all thriving in the cold fresh spring water. As long as the Lake O water was released in low to moderate volumes the fish did fine and there were enough available for both sports fishing and commercial netting. It was not until 1998 after the pulse releases were stopped, that a prolonged release of large volumes of freshwater became necessary and so stressed the estuary, that we began to see lesions on fish and oysters disappearing. When the high volume inflow diminished the lesions diminished and the oysters returned. There is a critical threshold of fresh water inflow from Lake O into the St. Lucie estuary above which its ecosystems are shocked. Is it possible to determine the critical threshold? I have heard about restoring the original flow of Lake O water south through the Everglades since my first trip to Florida in 1957 to camp in and explore the Everglades National Park. In the meantime the overflow from the lake is now dumped into the St Lucie without a management plan except to release it in large volumes dictated by rain. Are there scientists with the South Florida Management and the U.S. Corps of Engineers, in other words the state and federal governments, knowledgeable about the dynamics of estuaries that with their computer models can design an outflow plan for Lake O water to be released into the St. Lucie in a low volume steady state that does not exceed the critical threshold and allows the inflowing fresh water to blend with the salt water in a more natural manner? Is that possible? No fresh water coming into the St. Lucie estuary can have a negative effect as demonstrated during the drought years. The water became clearer but highly saline. The fishing declined and the mullet, which enter the estuary from the ocean stopped coming into it. Finger mullet move up from the ocean into lower saline waters where they feed on aquatic vegetation, algae, and mangrove detritus. Hiding in the mangroves from predators they grow to adult size. Before the drought during the pulse releases the canals and creeks of the St. Lucie would fill up with mullet and you could hear the snook feeding in them all night. Since the drought that no longer happens and only remnants of the great mullet schools are found in the Sr. Lucie now. In fact it was the mullet, glass minnows, and juvenile menhaden that grew in the brackish water luring in the predator fish that made for such good fishing years ago. In summary: the St. Lucie River is not being addressed as an estuary but as a place for large slugs of Lake O water to be dumped into in an all of none manner. Low volume pulse releases did not harm the fish or fishing, Large volumes of Lake O water in prolonged releases does harm the fish and fishing and promotes algae inflows and algae blooms. Drought and no releases of fresh water over a prolonged period causes higher	

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	than normal salinities (salt water intrusion) that can have a negative effect on estuary fish populations. While we wait for the southern flow from Lake O to be fully restored and proposed water storage areas to be developed can we do something for the St. Lucie estuary now? Will scientists and engineers working together design and implement a release system for Lake O water that provides a low volume flow of water to the St. Lucie in an effort to keep the lake at stable levels and maintain the health of the estuary instead of the current antiquated system of massive releases that shock the estuary and shock the community? Might it be accomplished at a fraction of the money allocated for Everglades Restoration? Can they do it? Is it possible?	
Keith Krueger	I want to express my opinion of the Everglades Reservoir Project. Please expedite the Project, we need to move the water south to recharge the aquifer and replenish the Everglades. I live on the treasure coast and we need to stop the damaging Lake Okeechobee water releases into the St. Lucie river and Indian River Lagoon. Please support this project. Keith Krueger	Your support for the project is noted.

Appendix C

Pertinent Correspondence

Comments on Draft EIS

SFWMD Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area

Miccosukee Tribe of Indians
of Florida

Business Council Members
Billy Cypress, Chairman

Roy Cypress Jr., Assistant Chairman
Jerry L. Cypress, Treasurer

Talbert Cypress, Secretary
Petties Osceola Jr., Lawmaker

July 17, 2018

COL Jason A. Kirk
Jacksonville District Commander
U.S. Army Corps of Engineers
701 San Marco Boulevard, Room 372
Jacksonville, Florida

SUBJECT: South Florida Water Management District (SFWMD) Section 203, Post Authorization Change Report (PACR) for the Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment Area (STA) and the Corps of Engineers (COE) Draft Environmental Impact Statement (DEIS), dated June 2018.

Dear Col. Kirk;

INTRODUCTION:

The Miccosukee Tribe of Indians of Florida (Tribe) appreciates the opportunity to comment on the SFWMD's Section 203, "Post Change Authorization Report", dated May 2018 and the US Army Corps of Engineers (COE) "Draft Environmental Impact Statement (DEIS)", dated June 2018. The Miccosukee Tribe strenuously objects to the continued use of Tribal lands in the Everglades as a biological filter to treat upstream pollution. Specifically, the Tribes objections are summarized below:

The Miccosukee Tribe of Indians of Florida ("Tribe") is a federally-recognized and federally-protected Indian Tribe, whose members live and work within the Florida Everglades, whose land interests lie within the Florida Everglades, and whose cultural identity and way of life is dependent upon the natural Everglades. The Tribe exercising powers of self-governance under a Tribal constitution approved by the Secretary of Interior, pursuant to the Indian Reorganization Act of 1934, 25 U.S.C.§ 476. The term "Everglades" as used herein refers to the areas presently identified as the Florida Water Conservation Areas (WCA) and Everglades National Park (ENP), although the Everglades ecosystem historically included a much larger area. The entire way of life of the Tribe and its members, including their cultural, religious, economic, and historical identity, is based upon the Everglades and upon the preservation of the Everglades in its natural state. The Tribe and its members rely upon the Everglades in its natural state to support both subsistence and commercial activities. Subsistence activities include gathering of materials, hunting, and fishing

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Constitution Approved by the Secretary of the Interior, January 11, 1962

within the Everglades. Commercial activities include frogging, airboat and other guided tours, and recreational and tourism facilities within the Everglades.

TRIBAL RIGHTS:

The Tribe has traditional, aboriginal, and statutory rights to use and occupy the Everglades and the Big Cypress Preserve. The Tribe's land interests and its natural resources (including its land, the flora and fauna living thereon, and the water flowing thereupon) lie within the Everglades. These interests include: (i) the Tribe's federal Indian Reservation; (ii) the Tribe's perpetual lease in WCA-3A (guaranteeing access, occupancy, and use in perpetuity under the terms of the Miccosukee Land Claims Settlement); and (III) the Tribe's permit for use and occupancy of an area along the northern boundary of ENP, known as the Miccosukee Reserved Area. In their natural states and conditions, these areas sustain a unique balance of flora and fauna, dependent upon the natural flow of unpolluted water, which creates and supports the Miccosukee way of life. The alteration of the natural state of the Everglades and its permanent destruction as a unique natural ecosystem, including imbalances in natural aquatic flora and fauna, seriously threatens the Tribe's entire way of life, its traditional bases of subsistence, its commercial activities, and its natural resources including its land, the flora and fauna living thereon, and the water flowing thereupon.

EFFECTS OF FEDERAL DECISIONS:

Any United States agency policy, agreement, practice, or action (whether explicit or tacit) which accepts, permits, overlooks, or encourages in any way, whether directly or indirectly, the discharge of polluted water which creates or threatens to create imbalances of natural flora or fauna or otherwise upset, alter or destroy the natural ecosystem of the Everglades, or which fails to enforce United States laws protecting the Everglades, or which discourages enforcement of Florida state laws protecting the Everglades, directly and substantially injures, harms, and damages each and every Miccosukee interest identified previously herein; to wit, the Tribe's entire way of life (and that of its members), the Tribe's cultural, commercial, and historical identity (and that of its members), the Tribe's subsistence and commercial activities (and those of its members), and the Tribe's land and natural resource interests.

EAA STORAGE RESERVOIR IMPACTS TRIBAL LANDS:

Miccosukee Tribal waters (both the federal Alligator Alley Reservation and the Leased Lands) are located in northern WCA-3A. Outflows from the A-2 STA would be conveyed to the Miami Canal south of the existing G-373 divide structure. A-2 Reservoir outflows can also be conveyed to either the Miami Canal or North New River Canal via the intake canal; both of which directly flow into the Miccosukee Tribal Everglades (both the Federal Reservation and the Leased Lands). Consequently, the EAA Reservoir directly affects the downstream receiving waters of the Tribe. The Miccosukee Tribe has adopted, and EPA has approved, Water Quality Standards for the areas that will be impacted by these discharges. The Miccosukee Tribe does not allow a "Mixing Zone" in Tribal waters of the Everglades, which are a Class III-A waterbody and an Outstanding Miccosukee Water (OMW).

TRIBAL WATER QUALITY STANDARDS:

The Miccosukee Tribe's Water Quality Standards apply to all Tribal Reservation surface waters, i.e., all waters within the exterior boundaries of the Miccosukee Tribe's Federal Reservation, including water situated wholly or partly within, or bordering upon Tribal Reservation Lands, whether public, private, or federally protected lands, e.g., National Parks or Preserves. The Miccosukee Water Quality Standards are the basis for regulatory enforcement against discharges outside the boundaries of the Federal Reservation pursuant to all applicable federal enforcement procedures as may be necessary to protect the quality of the water within the Federal Reservation. The Miccosukee Tribe's Water Quality Standards are consistent with Section 101(a)(2) of the Federal Water Pollution Control Act, as amended, [33 U.S.C. Section 1251 (a)(2)], which declares that "it is the national goal that, wherever attainable, an interim goal of water quality which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and on the water be achieved by July 1, 1983..." The Miccosukee Tribe, the State of Florida and the US Environmental Protection have all determined that excessive nutrients - including total phosphorus (TP) - constitute one of the most severe water quality problems threatening the Everglades Ecosystem.

The Tribe affords highest priorities to the protection from further nutrient enrichment of waters which are presently high in nutrient concentrations or sensitive to further nutrient concentrations and to further nutrient loadings. The Miccosukee Tribe intends to prevent adjacent water users from using Tribal waters or vegetative communities within Tribal jurisdiction as a biological filter with respect to nutrient removal. We expect that our upstream neighbor will take into consideration the Miccosukee Tribe's Water Quality Standards and "provide for the attainment and maintenance of downstream waters", as required by the federal Clean Water Act. The Miccosukee Tribe's waters in WCA-3A have a nutrient standard consistent with natural oligotrophic levels (including a total phosphorus limitation of 10 parts per billion of water). It has always been the policy of the Miccosukee Tribe that the most stringent nutrient standards will be applied to the most upstream reaches of the Tribal waters. This policy prohibits the use of the WCA-3A as a "Mixing Zone". The Miccosukee Tribe has designated the waters of its Alligator Alley Federal Reservation which are contained within WCA-3A (North Grass and South Grass and Gap areas) Class III-A and "Outstanding Miccosukee Waters" (OMW).

EPA DETERMINATIONS:

In 2012, the US EPA reviewed an "Assessment of the State of Florida's Everglades Water Quality Plan". At that time the EPA determined "The naturally nutrient-poor marshes of the Everglades are affected by both the concentration and the load of phosphorus. A "phosphorus load" is the amount (mass) of TP that results from the concentration of TP multiplied by the volume of water in which that concentration occurs. The loading of phosphorus is important to the ecosystem because the TP entering the Everglades remains within the marsh (for example, in soil and sediment) where it can continue to adversely affect aquatic flora and fauna and affect the TP concentrations observed in the surface water over the long-term." The EPA recognized that the Everglades marsh does not have a long-term net assimilative capacity above the TP criterion. The fact that the phosphorous loading damages the underlying soils is exactly why the WQBEL must be measured at the point of discharge and not at "networks of stations". The continued reliance

by Florida on the "networks of stations" and the "4 Part Test" results in the Tribes Everglades being used as a mixing zone.

WATER QUALITY COMPLIANCE:

There is a high risk that the EAA Storage Reservoir as presently planned and designed would not comply with environmental compliance requirements. Environmental policy compliance has not been validated at this time due to the fact that many of the environmental statutes still require the lead Federal agency to consult and coordinate. Unless the State abandons the 4 Part Test, and halts its use of the WCAs as mixing zones, it is almost certain that the Miccosukee Tribes Water Quality Standards will be violated. Since all federal agencies, including the COE and EPA, have a trust obligation and fiduciary obligation to protect the Tribes lands from being damaged thru their actions, this PACR must be rejected as not in the interest of the federal government.

APPROVAL OF FEDERAL AGENCIES:

This Section 203 PACR requires, at a minimum, the approval of the US Environmental Protection Agency (EPA), the Department of Justice (DOJ) and the Federal Courts to ensure compliance with water quality requirements of the Total Phosphorous Rule and Appendix A of 1991 Settlement Agreement in U.S. v. SFWMD, Case No. 881886-CIV-Moreno. Any water quality costs associated with treatment of existing polluted water (polluted water shifted from the coastal estuaries to the Everglades) is solely a state responsibility. The US Army Corps of Engineers should not cost share this project as there is no over-riding federal interest in shifting Florida's pollution problems from the coastal estuaries to the Everglades. Participation in a 50-50 cost share with the State of Florida for a project that further pollutes Tribal lands, invites the Corps of Engineers to become entwined into the on-going litigation problems of the State of Florida. Any Federal investment for construction and O&M of water quality features associated with this and other similar projects could be precedent setting across all of USACE. As you may recall, the DOJ representing the ENP, US Fish and Wildlife Service, and COE took the position in federal court the phosphorous load reduction requirements of United States v. SFMWD, Case No. 881886-CIV-MORENO (U.S.D.C., S.D. Fla) were prescriptive and not descriptive. This PACR represents a major departure; from 80% phosphorous load reduction requirement to a **36% phosphorous load increase**. Any agreement between the State of Florida and COE that condones a 36% phosphorous load increase on Tribal lands is not in the best interests of the federal government, the Miccosukee Tribe or the Everglades and should not be funded by the federal government.

EFFECTS ON C&SF SYSTEM:

The SFWMD preferred plan predicts an increase of 160,000 acre-feet of water (75% more volume) than the approved 2016 CEPP. This additional storage volume will have impacts on the adjacent Miami and North New River Canal systems, as well as infrastructure in WCA-3A and WCA-3B. The proposed EAA Storage Reservoir will put much higher volumes of water into the Miami/North New River Canal (through seepage) as well as high volumes/stages of water through the WCA's to the south that were never designed to account for this much water moving south. This fact gives the Tribe a high level of concern for flooding of Tribal lands. Tribal tree islands are inundated every year because there is an inability to move water south. Flooding of Tribal lands can only

get worse under this proposal and have a devastating effect on existing wildlife and bird populations. There is a high risk of failure associated with flowing additional water on downstream infrastructure that was never designed to handle the additional flows. Improvements to the downstream infrastructure as well as analysis to ensure flood conveyance capacity of the Miami and North New River Canal systems must be quantified. There is a currently an inability for the SFWMD and the COE to maintain the "Regulation Schedule" for WCA-3A. The addition of 160,000 acre-feet of water will certainly drown the tree islands in WCA-3A unless additional conveyance precedes the construction of the EAA Storage Reservoir. At a minimum, the state should identify how they intend to meet the COE Regulation Schedule for WCA-3A, considering they are not meeting it now.

HYDROPATTERN RESTORATION:

The CEPP PACR did not anticipate conveyance capacity limitations associated with the additional flows sent to the Everglades. The Section 203 PACR states that, "These additional flows are delivered with a timing shift that favor dry season flows in addition to CEPP when downstream infrastructure has adequate capacity to convey the flow." The PACR achieves an increase in flows south by storing a larger volume and delivering more flows, further into the dry season, extending hydroperiod within the Everglades system. The PACR increased flow south is realized not by increasing the peak discharge in the wet season but by opportunistically delivering dry season flows utilizing available system capacity that becomes available as the wet season flows subside.

Table F-3. WCA 3A Inflows and loads for ECB, FWO, and TSP

WCA 3A Average Annual Flow (thousand ac-ft/yr)			
	ECB	FWO	TSP
WCA 3A Inflows	1,470	1,637	2,105
Change from FWO	-10%	n/a	29%
Change from ECB	n/a	11%	43%
TP Load Discharged into Northern WCA 3A			
Total Load (mt/yr)	36	38	49
Change from FWO	-5%	n/a	30%
Change from ECB	n/a	5%	36%
TP Concentrations Discharged into Northern WCA 3A			
FWM TP Concentration (ppb)	20	19	19
Change from FWO	5%	n/a	0 %
Change from ECB	n/a	-5%	-5%

Notes:
1. Flow volumes are from Regional Simulation Model - Glades *LECSA* (*RSMGL*) model for 41 year simulation period.
2. ECB Average flow-weighted mean TP concentrations applied using available period of record grab sample data (Northern 3A 2006-2018), S11x (2006-2017), S9x (2003-2017), S140 (2008-2018), S190 (2008-2017) multiplied by daily simulated flows.
3. FWO, TSP (C240A) TP loads for Northern WCA 3A inflows calculated using DMSTA predictions adjusted to 12 ppb minimum annual outflow concentration. Estimated loads for the remaining structures were computed using historic period of record FWM TP concentrations applied to the 41-year simulated hydrology.
4. Loads based on flow-weighted mean calculations.

Table F-3 compares the flows and TP loads expected in the Existing Conditions Baseline (ECB), FWO, and the SFWMD'S tentatively selected plan (TSP) scenarios at the northern boundary of WCA 3A.

The Section 203 states that the "new water" provided by the TSP is critically important to the health of Everglades and therefore "essential" to Everglades restoration. Piggybacking off the CEPP Plan, the SFWMD concludes that the additional "new water" provided by the TSP is essential to restore: "...water depth, duration and distribution in WCA 3A, WCA 3B, and ENP and will serve to recreate a landscape characteristic of a pre-drained system that will support a healthy mosaic of plant and animal life. The restored hydrology of the Everglades ecosystem will more closely resemble a naturally occurring rainfall driven system with wet and dry cycles essential to flora and fauna propagation. Improved water depths and sheet-flowing distribution will begin to re-establish the unique ridge, slough and tree island micro-topography that once provided sustenance to the vast diversity of species inhabiting the Everglades." The original CEPP PIR approved by the Secretary and authorized by Congress determined that the first 210,000 acre-feet of additional CEPP flows are essential to Everglades restoration. However, the CEPP PIR determined that water quality treatment was essential to ensure that the "new water" was compatible with the needs of the Everglades ecosystem. CEPP assumed that the Everglades would receive 10 ppb total phosphorous water. The federal court has already rejected the argument that the benefits of "hydropattern restoration" outweigh compliance with water quality requirements. The same polluted water that the SFWMD admits is "undesirable" flowing to the estuaries will be sent south into the Everglades where they say it is "essential".

The States Section 203 PACR actually admits that there will be increased phosphorous in the northern WCAs which is exactly where Miccosukee lands are located. The Section 203 PACR states: "Due to improved hydropattern as a result of the TSP there would be reduced incidence of dry out of the northern marsh in WCA 3A which would limit peat oxidation and nutrient re-mobilization, potentially leading to lower downstream nutrient concentrations in southern WCA 3A. The increased flows within WCA 3A resulting from the TSP compared to expected changes in flow and flow patterns for the TSP would likely cause a negligible increase to nutrient loading in northern WCA 3A." It is clear that the State of Florida intends to continue to use the Tribal lands in northern WCA-3A as a mixing zone. And on page ES-8 of the EIS it states: "...there is a potential for slightly degraded water quality conditions in the new Lake Okeechobee water that would be discharged to WCA 3A if the STA features are undersized. A sensitivity model run regarding settling rates would need to be performed, with a settling rate of zero, for the reservoirs to ensure water quality standards would be achieved".

The Environmental Impact Statement admits on page 4-28, paragraph 4.20.1, that Tribal Water Quality Standards are likely to be violated " The Recommended Plan as presented in the SFWMD Section 203 report Annex F, Phosphorus Assessment, has the potential for slightly degraded water quality conditions from discharges into WCA 3A if the STA/WQ treatment features are undersized. Additionally, if STA diversions are not eliminated, untreated water bypassed to WCA 3A will degrade water quality. The Recommended Plan as presented in the SFWMD Section 203 report Annex F, assumes a settling rate of 2.5 m/yr. Water quality experts from the Department of Interior (DOI) proposed a settling rate of zero and suggested that without vegetation, assuming a settling rate of 2.5 m/yr for a deep reservoir is very optimistic." It is unconscionable that either the COE or EPA could approve such an increase in phosphorous loading into the Everglades and knowingly violate the Tribes Water Quality Standards.

JUDGE GOLD – CLEAN WATER ACT LAWSUIT:

This is not the first time that the State of Florida has attempted to justify polluting the Tribal Everglades in the name of "Hydropattern Restoration". The concept of substituting "Net Improvement" or "Hydropattern Restoration" for actual water quality compliance was incorporated into the now infamous "Everglades Forever Act of 1994" (Chapter 373.4592 of the Florida Statutes (F.S.)). After extensive litigation, Judge Gold totally rejected Florida's attempt to justify phosphorous pollution of the Everglades in the name of "Hydropattern Restoration". Nevertheless, the State is attempting the same tactic again in this Section 203, PACR which expressly attempts to avoid compliance with existing water quality standards.

Judge Gold Ruling: Case 1:04-cv-21448-ASG Document 323 Entered on FLSD Docket 07/29/2008. Judge Gold stated, in relevant part:

"....These subsections establish "moderating provisions" which permit discharges into or within the "impacted areas" of the Everglades Protection Area until December 31, 2016 "using net improvement" and beyond that date in unimpacted areas for hydrorestoration purposes. Under this provision, the numeric phosphorus criterion becomes a "planning goal." Instead of meeting the 10 ppb criteria, discharges into impacted areas "shall be permitted" using net improvement as a moderating provision. Even if the phosphorus numeric criterion (and the narrative criterion) are not met in accordance with the Rule's achievement methodology, the Rule is unequivocal that "[n]o action shall be required, provided the net improvement or hydropattern restoration provisions of subsection (6) below are met." No action translates into "no enforcement" of the protective 10 ppb criteria. The phrase "net improvement" is not defined in the Rule, but the Rule provides that "[i]mplementation of BAPRT will result in net improvement in the impacted areas of the EPA" regardless of whether such "net improvement" causes an imbalance of Everglades aquatic flora and fauna. F.A.C. § 62-302.540 (6)(a)(3). To use an example, if a discharge was at 50 ppb but reduced through BAPRT to 40 ppb, there is a net improvement, although the "net improvement" is not protective at the established 10 ppb as accepted by the EPA. Nonetheless, the Rule is unequivocal that "Until 2016, . . . permits shall include technology-based effluent limitations consistent with the Long-Term Plan." This section must be read in para materia with subsection (5)(b)(3) which provides that "discharges into the EPA will be 'deemed' in compliance with state water quality standards upon a demonstration that . . . discharges will comply with moderating provisions of this rule." Thus, even if the phosphorus levels in the discharge will not be at or below the phosphorus levels set forth in the Rule (see subsection 5(b)(1)), or even if such discharges will cause or contribute to exceedences of the phosphorus criterion set forth in the Rule (see subsection 5(b)(2)), the discharges will be allowed so long as such discharge complies with moderating provisions. This "blanket exemption," without the State first performing a "use attainability analysis" is contrary to the CWA."

In another part of Judge Gold's decision, the follow observation is made:

"The Rule provides for a second form of moderating provision dealing with discharges into or within "unimpacted areas." These type of discharges are permitted for "hydropattern restoration purposes" if a permit applicant can show that (1) the discharge will be able to implement or cause to be implemented BAPRT; (2) the environmental benefits of establishing the discharge clearly

outweigh the potential adverse impacts that may result in the event the phosphorus level in the discharge exceeds the criterion; and (3) the discharge complies with anti-degradation requirements. Unlike the moderating provisions for impacted areas, there is no date comparable to 2016. The clear inference is that moderating provisions for unimpacted areas can be permitted indefinitely, regardless of whether the 10 ppb criteria is achieved."

Clearly, the Section 203 PACR attempts to use the same failed argument that the "benefits outweigh the potential adverse impacts". This was solidly rejected by the federal courts.

WQ LITIGATION:

The original CEPP plan authorized by Congress was produced in consultation with U.S. DOJ and U.S. EPA regarding water quality and Clean Water Act (CWA) compliance permitting in the area of the project. Before any PACR could be approved those Federal agencies will need to be consulted on the impacts of the proposal to the State's compliance with a number of legal requirements, including compliance with the Tribe's water quality standards.

Total phosphorous concentrations in discharges from SFWMD STAs have been subject to ongoing Federal and state litigation currently managed under State and Federal consent orders. These include 2012 state Consent Orders issued to SFWMD by FDEP to build additional water quality improvement projects, including the A-1 FEB. The SFWMD preferred alternative includes the construction of a new 6,500 acre foot STA to treat the water quality of the increased water flow contemplated, and a reservoir in the A2 FEB footprint integrated into the A-1 FEB, the latter of which is a state "Restoration Strategies" feature subject to the state consent orders.

The water quality of flows entering the Everglades Protection Area, including WCA-3A and ENP, have also been subject to litigation at the Federal level involving the United States, represented solely by the DOJ. This is currently subject to a Settlement Agreement entered in United States v. SFMWD, Case No. 88-1886-CIV (U.S.D.C., S.D. Fla) establishing long-term water quality limits for water entering areas that will receive flows from CEPP (Appendix A). SFWMD's Section 203s specific rules concerning Total Phosphorus are also subject to the continued oversight and review of the EPA through a Framework Agreement between the EPA and Florida's Department of Environmental Protection (DEP) to ensure compliance with CWA and water quality requirements flowing into the Everglades, and through an Amended Determination by the EPA developed under separate litigation in Federal court ("Judge Gold litigation").

PHOSPHOROUS LOADING:

Table F3 of the PACR indicates that this EAA Reservoir will result is a 43% increase in flows into Tribal lands with a 36% increase in phosphorous loadings. This fact alone is reason enough for the federal agencies to reject the PACR from federal matching funds. The Miccosukee Tribe was assured an 80% phosphorous load reduction during the Settlement Agreement and Consent Decree.

The Special Master Report opined on January 4, 2011 that the phosphorous load reduction requirements does not created an enforceable obligation to reduce phosphorous in WCA-2 and WCA-3 but does have an enforceable obligation with respect to phosphorous load reductions in

WCA-1 and ENP. The Miccosukee Tribe and the DOJ disagreed vehemently with this mischaracterization. In fact, if the phosphorous load reduction did not apply to the Tribal lands, the Miccosukee Tribe would never have settled the Judge Hoeveler Case. The Special Master erroneously agreed with the SFWMD's argument that the load reductions were descriptive and not prescriptive. On September 28, 2011, federal Judge Moreno adopted the Special Masters Report. Judge Moreno stated, "Like the Special Master, the Court is also persuaded that there is no enforceable obligation as to the load reductions because the Consent Decree contains no recourse in the event the load reductions are not met". The Miccosukee Tribe continues to believe that the Settlement Agreement and Consent Decree mean exactly what they say. This is just another broken agreement to the Miccosukee people. Now that SB-10 was passed in the Florida legislature, the necessity of having this interpretation becomes clear: The State of Florida intends to discharge a 36 percent INCREASE in phosphorous loading onto Tribal lands, rather than the agreed 80% reduction. The Tribe will continue to use all legal means to protect their homelands and expects that federal agencies who owe a trust obligation to the Tribe will assist and not hinder their efforts.

FEDERAL COST SHARE:

Corps Policy Memorandum states: "It is expressly against Federal policy to recommend for implementation projects or features that would result in treating or otherwise abating pollution problems caused by other parties where those parties have, or are likely to have a legal responsibility for remediation or other compliance responsibility... for CERP projects where inflows do not currently meet water quality standards the Corps will evaluate the benefits of any water quality features in Project Implementation Reports (PIRs) and if the benefits are determined to be essential to Everglades restoration, then the Corps may recommend to Congress in a PIR that it be given specific statutory authority to build and cost share the subject water quality features to both help achieve water quality requirements and provide additional restoration benefits critical to the successful implementation of CERP. The cost of operating and maintaining (O&M) such features would be allocated so that the costs of bringing the inflowing water into compliance with pre-project water quality requirements would be born 100% by the Non-Federal Sponsor." Additionally, the ASA office and USACE policy guidance is that the COE has been directed <u>not to cost share</u> on any water quality projects or features associated with restoration/water resource projects for Lake Okeechobee. Since the water for this project's reservoir is coming from Lake Okeechobee, cost sharing for water quality features under current guidance is prohibited. The federal government absolutely should reject any request by the State of Florida to cost share in this project until the State comes up with a plan to meet existing water quality standard of 10 ppb total phosphorous as measured at the <u>end of pipe</u>. Anything less is a tacit approval to continue to pollute the Greater Everglades and Tribal lands.

ISSUE OF WILLING SELLERS ONLY:

COE policies do not require land to be in public ownership to be considered as potential sites for management measures. COE regulations state that the District Commander shall consider utilization of both public and private lands, and select the lands that represent the best balance of costs, effectiveness, and acceptability consistent with incremental cost analysis. The COE is to "identify potential project lands, other public lands, and separable private lands determined

suitable for applying each candidate management feature. The identification of potential mitigation sites should not be constrained for analysis purposes. This analysis should focus on determining the management potential of each candidate site relative to its ability to meet mitigation objectives. For the purpose of analysis preference shall not be given to the management of project and other public lands over the use of suitable private lands." The Miccosukee Tribe understands that the COE has not conducted an "Alternatives Analysis" of this plan. Before any cost sharing arrangement can even be considered, the COE should conduct an independent alternatives analysis. The prohibition of using private lands, and only lands south of the lake, and the "willing seller" provision are not constraints on the COE alternatives analysis. The Tribe believes that if such an alternatives analysis were conducted, the COE would determine that storage north of Lake Okeechobee is preferable (where the phosphorous loading originates). Use of the Rotenburger and Holy Land tracts as STAs should be considered. In short, SB-10 is badly flawed and the COE is not constrained by SB-10 provisions. Federal laws and policies should supersede state laws and policies. The Tribe agrees with the statement in the EIS: "The SFWMD Section 203 planning process was restricted with regard to lands under Laws of Florida, Chapter 2017-10, which prohibited the use of imminent domain. The Corps planning process would not include such constraints." Large tracts of former Everglades lands are currently managed by Florida for a single species (deer hunting). Since the COE is not constrained by SB-10 restrictions, the COE should consider all options during their Alternatives Analysis. In any event, this recommended plan should be rejected as not in the federal interest.

ENVIRONMENTAL JUSTICE:

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations", requires the federal government to achieve environmental justice by identifying and addressing high, adverse and disproportionate effects of its activities on minority and low-income populations. The disproportionate adverse impact of Miccosukee Tribal Everglades receiving an additional 36% phosphorous load would violate the federal governments Trust Responsibility and the Executive Order.

FLOODING AND FLOWS:

The Section 203 PACR claims that it will also help maintain microtopography throughout WCA-3A and ENP because the additional volumes of water will allow velocities to occasionally reach 2.3 cm/sec, which will resuspend floc. The lack of flow has caused the entire Everglades to either get relatively deep (e.g., WCA-1) or to flatten out and lose its distinctive slough patterning (e.g., WCA-3A-North). The occasional redistribution of floc and slough bottom sediments will reduce the flattening of the system, provide resilience against droughts and increase the restoration of wading birds. While flow is important to the Everglades it is not the only consideration. Water quality below the oligotrophic criterion of 10 ppb total phosphorous is equally important. Increases of phosphorous loading with water in excess of 10 ppb TP will degrade the northern Everglades habitat and load the muck sediment with phosphorous which may take over 100 years to remove. Another important factor is excess water depth. Without the capacity to pass the new water out of WCA-3 into the ENP, the water will stack in WCA-3, inundate the tree islands and cause loss of tree islands as occurred in WCA-2.

VIOLATION OF SAVINGS CLAUSE:

In accordance with the Savings Clause provisions of the CERP authorization in WRDA 2000 (Sections 601(h)(4) and (5)) and applicable State and Federal standards, the following constraints were applied to the SFWMD Section 203 Project, many of which were included in the 2014 CEPP planning and implementation: (1) Not reduce levels of service for flood protection that were in existence on the date of enactment of WRDA 2000, (2) Not eliminate or transfer existing legal sources of water until a new source of comparable quality and quantity is available, (3) Meet applicable State water quality standards, and (4) Not affect the Tribal Compact. It is clear from the Section 203 PACR and the EIS that 3 of the 4 constraints are going to be violated with the Recommended Plan. Not only will the Tribes Water Quality Standards be violated, but the additional water will raise water levels on the federal Reservation and violate the Saving Clause of WRDA.

UNDERSIZED STA AND BYPASS :

Again, the Environmental Impact Statement admits on page 4-28, paragraph 4.20.1, that Tribal Water Quality Standards are likely to be violated: "STA bypasses and significantly less uptake of phosphorus by the deep FEB's than predicted could result in a worsening of downstream conditions in WCA 3. Water quality treatment features may need to be more conservatively designed in PED (i.e. more treatment capacity to address uncertain Adaptive Management, adjusting flows to reduce/eliminate bypass events, and the addition of new treatment areas). By over estimating the uptake of the A-2 FEB, the STA may be undersized, which would lead to more water bypasses of the STA before being discharged into WCA 3". The under sizing of the STAs could potentially be solved if the Corps determined that the Rotenburger and Holey Lands were necessary to treat an additional 240,000 acre feet of water. Another option could involve the COE determining that northern lake storage is needed so that the 23 foot deep reservoir is unnecessary. Either way, it is a near certainty that a 23 foot deep reservoir cannot possibly provide the same water quality treatment as a shallow water reservoir.

DAM SAFETY REQUIREMENTS:

The SFWMD's tentatively recommended plan's reservoir design does not adhere to USACE dam safety policy/requirements for potential failure mode and life loss consequence analysis. Hurricane Katrina and New Orleans should come to mind when the COE hears that the State intends to build a 23 foot deep reservoir. The Section 203 PACR did not determine the consequences of failure for the proposed EAA Storage reservoir. The risk to human life must be considered when evaluating any plan to build a deep water reservoir. WRDA 1986 requires such an analysis: "Any report that is submitted to the Committee on Environment and Public Works of the Senate or the Committee on Public Works and Transportation of the House of Representatives by the Secretary, or the Secretary of Agriculture acting under Public Law 83-566, as amended, which proposes construction of a water impoundment facility, shall include information on the consequences of failure and geologic or design factors which could contribute to the possible failure of such facility."

CULTURAL RESOURCE IMPACTS:

The Miccosukee Tribe remains very concerned with the proposed plan on the cultural resources located within the area. The EIS acknowledges the presence of these resources but does nothing to assure the Tribe that these sites will not be inundated: "The Recommended Plan may result in major long-term adverse effects on cultural resources sites 8PB16039 and 8PM16040. Mitigation of effects for historic property 8PB16039 potentially reduced to no effect. Mitigation of effects for culturally significant site 8PM16040 is unknown."

CONCLUSION:

When the Corps of Engineers submits the Section 203 PACR and the EIS to the US Congress, they should specifically recommend that there is no federal interest in shifting pollution from one area into the Everglades. The Tribe requests that the COE highlight Tribal concerns that this plan will further pollute the Tribe's Everglades. Should the US Congress entertain a cost sharing arrangement on this severely flawed plan, they should direct the COE to conduct an Independent Alternatives Analysis which includes alternate sites and water depths for water storage. While Florida agencies (such as the SFWMD) may be required under Florida law to shift phosphorous loading from the northern estuaries to be discharged into the Everglades, it is not good environmental policy. This is what happens when legislators pretend to be scientists. The impacts of additional phosphorous loading to the northern Everglades will be felt disproportionately by the Miccosukee Tribe. The COE should identify the many technical, policy, and legal concerns with this PACR to the US Congress and recommend rejection. Primary among the Tribes concerns is a 43% increase in flows and a 36% increase in phosphorous loading to the northern Everglades (where the Tribe's Federal Reservation exists) and a continuing violation of the Tribes Water Quality Standards.

Sincerely yours,

Billy Cypress
Tribal Chairman

cc: Business Council
Gene Duncan, Water Resources Director
Jeanine Bennett, Esq., In-House General Counsel

July 24, 2018

Ms. Stacie Auvenshine
U.S. Army Corps of Engineers
Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019

Transmitted via email: EAAReservoir@usace.army.mil; Stacie.J.Auvenshine@usace.army.mil

Re: Draft Environmental Impact Statement SFWMD Section 203 EAA Reservoir

Dear Ms. Auvenshine:

This letter is written on behalf of the Sanibel Captiva Conservation Foundation in support of the South Florida Water Management Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area project. We appreciate the opportunity to comment and applaud the federal and state expedited review of this critical Comprehensive Everglades Restoration Plan (CERP) project which we have been actively engaged in during the entire planning process.

The hydrological benefits of this project are fundamental and significant to advancing Everglades restoration goals of reducing harmful, excess discharges to the Caloosahatchee and St Lucie estuaries and increasing freshwater flows to the southern Everglades. This one project will provide more than any other single or group of projects to reduce harmful flows to the estuaries.

The Caloosahatchee estuary experiences harm from both excessively high flows as well as insufficient flows in the dry season and droughts. While the EAA reservoir project is critical to provide relief to the Caloosahatchee from harmful high flows, the river and estuary depend on dry season flows from Lake Okeechobee to manage a low salinity zone in the upper estuary downstream of the WP Franklin Lock and dam, S-79. Unfortunately the evaluation for the level of dry season flows and the habitat unit analysis are based on incorrect and inadequate SFWMD MFL and RECOVER performance measures that we have documented do not support the reported outcomes. We continue to oppose these standards and would ask that this issue be revisited to correct documentable outcomes.

We would like to underscore the importance of ensuring that the benefits of this project go hand-in-hand with the State's commitment of achieving long-term water quality goals in the Everglades. To that end, we urge the Corps to incorporate the State's representation that it will expand or modify the project if necessary to meet water quality standards while maintaining project benefits into the Project approvals.

Finally, we agree with the Corps' conclusion that, "CERP identifies capacity for 360,000 acres of storage south. We disagree with the SFWMD report that suggests the EAA Reservoir and STA would be considered the final, not incremental, implementation of components of the CERP Everglades Agricultural Area Reservoirs (Component G of CERP).

We appreciate the opportunity to comment and applaud the federal and state expedited review to move this project forward and stand ready to continue to participate in the process as it moves forward to reality.

Sincerely,

Rae Ann Wessel, Policy Director
Sanibel Captiva Conservation Foundation

Audubon Florida * Conservancy of Southwest Florida * Everglades Law Center * Florida Wildlife Federation * National Parks Conservation Association

Stacie Auvenshine
U.S. Army Corps of Engineers
Jacksonville District
P.O. Box 4970
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Via email to: Stacie.J.Auvenshine@usace.army.mil

July 24, 2018

Re: *South Florida Water Management District Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area (Central Everglades Planning Project Post Authorization Change Report) EIS No.: 20180126*

Dear Ms. Auvenshine,

Please accept these comments in support of the *South Florida Water Management District Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area (Central Everglades Planning Project Post Authorization Change Report) EIS No.: 20180126.* The undersigned organizations engaged extensively in the South Florida Water Management District's (SFWMD) Section 203 process and have participated in numerous meetings and reviews since the initiation of this planning project in October of 2017. We appreciate the opportunity to comment and remain engaged throughout the federal review process.

The EAA Reservoir was initially authorized by Congress as part of WRDA 2000 as one of the initial slate of projects for implementation in recognition of its importance to Everglades restoration. The EAA Reservoir is an integral component of the Comprehensive Everglades Restoration Plan and the hydrologic benefits described in the draft EIS and SFWMD Section 203 Report are significant in achieving the reduction of harmful discharges to the Caloosahatchee and St. Lucie estuaries and in increasing freshwater flows to Everglades National Park and Florida Bay.

The ecosystem benefits to be provided by this project are greatly needed and long overdue. In recent years harmful discharges from Lake Okeechobee to the coastal estuaries have

occurred with increasing frequency, volume, and duration. At times the discharges from the lake have been laden with cyanobacteria, which has contaminated the waterways and poses a significant threat to public health. The harm caused by these damaging discharges to local environments and economies is immense and as a result, the health of both is greatly suffering.

While CEPP provides significant benefits to the Everglades and coastal estuaries, the additional conveyance, storage, and treatment features identified by the EAA Southern Reservoir and STA project are needed for further reduction of harmful discharges, particularly the longer duration and higher volume discharges that the CEPP did not address. As noted in the Assessment Report by the Assistant Secretary of the Army:

> "[T]he CEPP PACR further reduces the number, return frequency and severity of damaging high volume and long duration regulatory releases to the Northern Estuaries from Lake Okeechobee. The long duration, high-flow discharge events that are most detrimental to the estuarine species, such as oysters and seagrasses, would be reduced by 40% and 55% to the Caloosahatchee and St Lucie estuaries respectively, in addition to the benefits provided by CEPP. In combination with the previously authorized projects the CEPP PACR provides a 55% reduction in discharge volumes and 65% reduction in mean monthly high-flow discharge events to the Northern Estuaries from Lake Okeechobee. These benefits significantly improve the northern estuary conditions above and beyond CEPP by further reducing the volume, duration and return frequency of damaging events. Reducing the duration and return frequency of these damaging discharges alone allow more time for the estuaries to recover and establish resiliency." (*South Florida Water Management District's Central Everglades Planning Project, Section 203 Post Authorization Change Report, Integrated Feasibility Study and DRAFT Environmental Impact Statement, Office of the Assistant Secretary of the Army, May 2018, at 55).*

Additionally, the EAA Southern Reservoir and STA has identified important and needed benefits in delivering dry season flows to the Everglades system which provides further mitigation against the impacts of sea level rise.

While the environmental benefits of this project are significant and greatly needed, concerns have been raised about the project's ability to meet the mandated Water Quality-Based Effluent Limit (WQBEL) while maintaining the level of benefits identified by SFWMD. The Office of the Assistant Secretary of the Army noted in its Review Assessment

the, "significant risk that once constructed, the flows into the Everglades from this project will not meet water quality standards, and the project flows will be reduced significantly to meet those standards, or the facility completely taken off-line." (*South Florida Water Management District's Central Everglades Planning Project, Section 203 Post Authorization Change Report, Integrated Feasibility Study and DRAFT Environmental Impact Statement, Office of the Assistant Secretary of the Army, May 2018).* Similarly, the Environmental Protection Agency, "[c]ontinues to recommend that the USACE and SFWMD carefully consider the Total Phosphorus (TP) Water Quality Effluent Based Limit (WQBEL) when considering various alternatives for the A-2 parcel." (EIS Appendix C at 65).

In its approval of the project, the Florida Department of Environmental Protection addressed this issue via a Secretarial Order which, regarding the WQBEL, provides:

> *"The modeling contains various conservative assumptions and practices to provide certainty that the applicable WQBEL will be achieved by the project. Although all modeling and associated assumptions have some level of uncertainty, permitting requirements applicable to the STAs ensure the WQBEL will ultimately be achieved. In the event the WQBEL is not attained, additional actions to meet water quality requirements must be undertaken. For example, the District could convert portions of the A-1 Flow Equalization Basin to a STA."* (Secretarial Order at 5).

Our support of this project is based upon the State's representation that the identified project benefits will be fully achieved while meeting the WQBEL and that if necessary, the project will be modified or expanded to meet the necessary water quality standard without any reduction of project benefits. As noted on page 4-13 of the EIS, we urge the Corps and SFWMD to utilize conservative estimates in modeling STA and reservoir water quality performance and to disallow untreated water to bypass the STA's. We further urge the Corps to incorporate the State's representation that it will expand or modify the project if necessary to meet water quality standards while maintaining project benefits into the Project approvals.

Additionally, the SFWMD Section 203 Report suggests that the Southern EAA Reservoir and STA would be considered the final, not incremental, implementation of components of the CERP Everglades Agricultural Area Reservoirs (Component G of CERP). We agree with the Corps' conclusion that, "CERP identifies capacity for 360,000 acres of storage south of Lake Okeechobee, for Component G. Considering anything short of 360,000 acre storage option a final action could limit achievement of CERP goals related to Component G." (EIS at 3-4).

We also note the Corps' statement in the EIS that Senate Bill 10 "explicitly mandated that the SFWMD to utilize publicly-owned lands." This statement is incorrect and should be corrected as Senate Bill 10 did not limit the state to utilizing exclusively publicly owned lands but rather mandated the SFWMD to identify the "optimal configuration" of the project.

We thank you for your consideration of these comments and look forward to continued participation as this project moves forward.

Sincerely,
(*signatures waived to expedite delivery)*

Celeste De Palma
Director of Everglades Policy
Audubon Florida

Marisa Carrozzo
Senior Environmental Policy Specialist
Conservancy of Southwest Florida

Lisa Interlandi
Executive Director
Everglades Law Center

Manley Fuller
President
Florida Wildlife Federation

Cara Capp
Everglades Restoration Program Manager
National Parks Conservation Association

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 10 2018

Colonel Jason Kirk, Commander
Jacksonville District, US Army Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

Re: Draft Environmental Impact Statement (DEIS) for South Florida Water Management District Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area, Miami-Dade County, Florida; CEQ No: 20180126

Dear Colonel Kirk:

The U.S. Environmental Protection Agency has reviewed the above referenced document in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The purpose of the DEIS is for the US Army Corps of Engineers (USACE) to evaluate the impacts associated with the proposed restoration project that is described in the South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area ('EAA Reservoir DEIS'). The EPA notes that SFWMD's tentatively selected plan (TSP) would make modifications to the previously Congressionally-authorized Central Everglades Planning Project (CEPP). The SFWMD prepared a feasibility study and environmental study pursuant to Section 203(a)(1) of the Water Resources Development Act (WRDA) of 1986. The Federal action required by the USACE was to evaluate and report whether the project is feasible and provide any recommendations concerning the project design or conditions for construction to several Congressional committees. In a letter dated May 30, 2018, Mr. R.D. James, the Assistant Secretary of the Army for Civil Works, made the determination that the project was feasible and that the USACE's Review Assessment was submitted to the Office of Management and Budget for clearance to submit to Congress.

The EPA provided technical comments for the CEPP DEIS on December 2, 2013, and the FEIS on October 6, 2014. The EPA provided scoping comments for the EAA Reservoir DEIS to the SFWMD on November 21, 2017, and to the USACE on April 30, 2018. Additionally, the EPA staff attended numerous public meetings and agency coordination meetings for the proposed restoration project.

As stated in the DEIS's cover sheet, the purpose of the project was *"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."* The SFWMD identified 6 alternatives in their environmental documentation and compared these alternatives to the 'No Action' alternative, which was the original Congressionally-authorized CEPP. The SFWMD identified Alternative C240A as the recommended plan and the environmentally-preferred plan. The USACE states that the Alternative C240A includes a 240,000 ac-ft. above-ground reservoir and a 6,500-acre Storage Treatment Area (STA) that would work in conjunction with the existing 60,000 ac-ft A-1 Flow Equalization Basin (FEB), STA-2, and STA-3/4 to reduce

nutrient levels in the freshwater so that it could be transferred into the Everglades. The USACE also states in the DEIS that the TSP would increase flows to the greater Everglades.

The EPA notes that the Everglades' STAs have a National Pollutant Discharge Elimination System Permit and an Everglades Forever Act Permit issued by the Florida Department of Environmental Protection (FDEP). These permits require that the STA discharges meet a Water Quality Based Effluent Limit (WQBEL) for phosphorus of 13 parts per billion (ppb) long-term average. SFWMD performed water quality modeling, and they concluded that based on the modeling, the Recommended Plan would discharge at the WQBEL. In March of 2018, the Secretary of the FDEP issued Executive Order DEP #18-0054 regarding the EAA reservoir which states: "*that regardless of the modeling predictions, existing permit conditions ultimately require attainment with the WQBEL*" and "*In the event the WQBEL is not attained, additional actions to meet water quality requirements must be undertaken.*"

The EPA encourages the USACE, as the government agency charged with tribal consultation under Executive Order No. 13175, "Consultation and Coordination with Indian Tribal Governments" (Nov. 6, 2000), to conduct tribal consultations with the Miccosukee Tribe of Indians of Florida and the Seminole Tribe of Florida, as it deems appropriate. Also, we encourage the SFWMD to continue its outreach efforts to the Tribes in conjunction with the proposed project. The EPA notes that in its January 8, 2018, letter to the SFWMD, the Miccosukee Tribe of Indians of Florida outlined concerns regarding the proposed EAA Reservoir project. The EPA works closely with both Tribes on Everglade matters and is committed to working with the SFWMD, state and Federal partners regarding the Tribes' water quality and water management concerns.

Overall, the EPA is supportive of the TSP and we concur with the USACE that the modifications to the CEPP would be beneficial to the northern estuaries and would increase much needed flows to the Everglades. The DEIS has been rated as a Lack of Objections ('LO'). The EPA appreciates the opportunity to review the DEIS and looks forward to continued participation in the Comprehensive Everglades Restoration Plan project development process. If you wish to discuss this matter further, please contact Ms. Jamie Higgins, of my staff, at (404) 562-9681 or by e-mail at higgins.jamie@epa.gov.

Sincerely,

Carol J. Monell

Carol J. Monell
Acting Director
Resource Conservation and Restoration Division

July 24, 2018

Stacie Auvenshine
U.S. Army Corps of Engineers
Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019

Via email to Stacie.J.Auvenshine@usace.army.mil

Dear Ms. Auvenshine:

The Everglades Foundation writes in support of EIS No. 20180126, Draft, Central Everglades Planning Project South Florida Water Management District Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area. The EAA Reservoir is an integral component of the Comprehensive Everglades Restoration Plan (CERP) and the hydrological benefits described in the draft environmental impact statement (EIS) are significant in reducing harmful discharges to the Caloosahatchee and St. Lucie estuaries and increasing freshwater flows to the central and southern Everglades.

We greatly appreciate your expedited review of this critical restoration project. Even with this condensed review period, we believe that the Corps has undertaken a thorough review of the South Florida Water Management District's (SFWMD) Section 203 submission to modify the Central Everglades Planning Project (CEPP) by the inclusion of a deep reservoir. We offer two comments on the draft EIS for consideration in preparing the final EIS.

First, the draft EIS may understate the actual project benefits. The method used in Section 4 focused on a smaller subset of parameters that do not necessarily reflect the magnitude and character of those benefits. For example, on page 4-6, the EIS states that the proposed modifications result in "moderate to minor increases in overland flow rates" in Everglades National Park. Based on analyses by The Everglades Foundation, the overland flow in Everglades National Park shows significant improvements over a wide range of conditions, from wet years to droughts (see Figure 1). That is remarkable performance by a reservoir and shows a benefit of similar magnitude as CEPP. Moreover, these hydrologic changes attributable directly to the reservoir result in significant environmental benefits as measured by the ecological performance metrics adopted in CERP (see Figure 2). If the Corps would like additional information, The Everglades Foundation is prepared to greatly expand on these examples.

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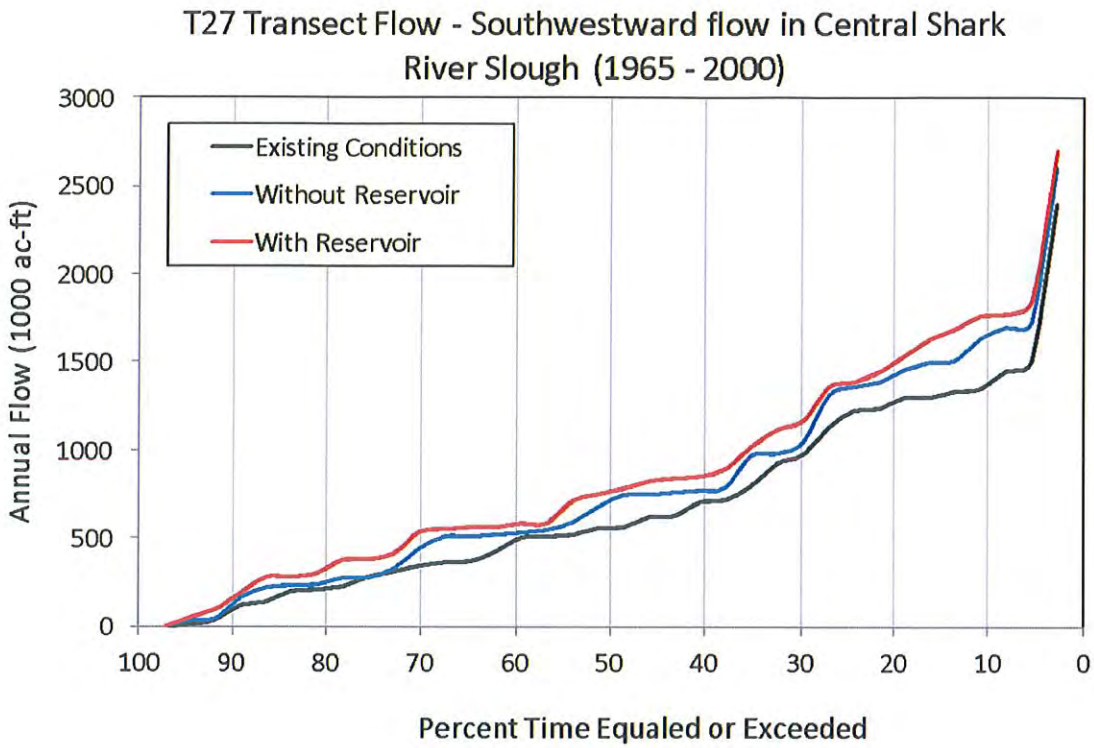

Figure 1. Distribution of annual overland flows in Everglades National Park (Transect 27) for the Base Condition (existing conditions), Central Everglades Plan (without reservoir), and CEPP with the reservoir.

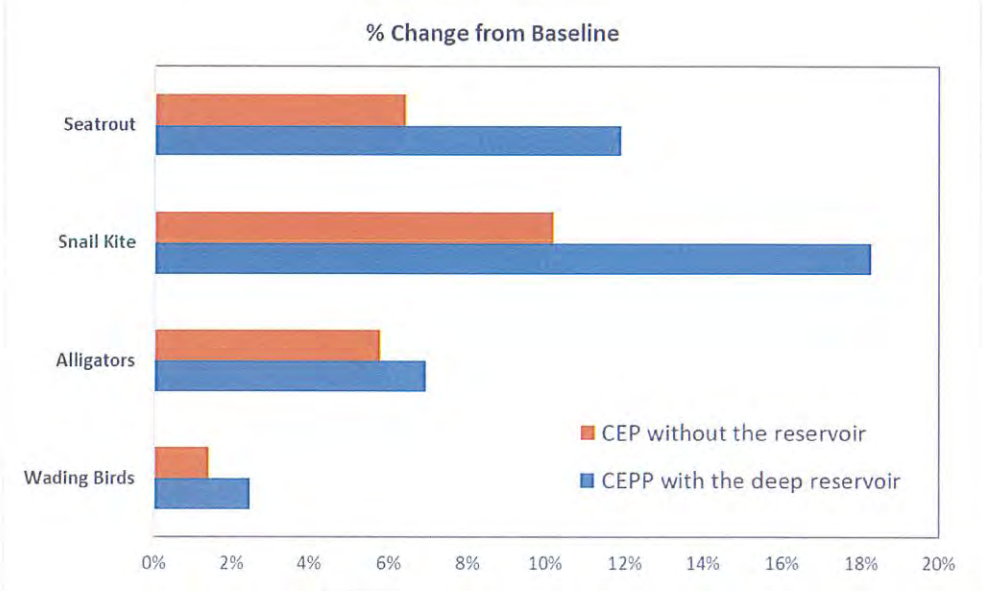

Figure 2. Example of wildlife performance measures showing significant environmental benefits attributable to the reservoir.

Second, while the summary in Section 5.5 is a concise and fairly accurate encapsulation of the issues,[1] we recommend that the final EIS reflect the State of Florida's commitment to achieving the hydrological benefits described in the EIS. During the planning process, the SFWMD provided assurances that water quality standards will be met without reducing the hydrological benefits of the project. The Florida Department of Environmental Protection's Final Order Approving the Central Everglades Planning Project Post Authorization Change Report Everglades Agricultural Area Reservoir (DEP #18-0054/OGC No. 18-0138) provided additional assurances, including:

> The project will be designed to treat all beneficial flows to the Everglades Protection Area predicted by the Regional Simulation Model so that the applicable WQBEL will be attained.
>
> ***
>
> The modeling contains various conservative assumptions and practices to provide certainty that the applicable WQBEL will be achieved by the project. Although all modeling and associated assumptions have some level of uncertainty, permitting requirements applicable to the STAs ensure the WQBEL will ultimately be achieved. In the event the WQBEL is not attained, additional actions to meet water quality requirements must be undertaken. For example, the District could convert portions of the A-1 Flow Equalization Basin to an a STA.

Order at para. 5. The State's commitment to achieving both the WQBEL and the projected hydrological benefits is an important factor to consider when evaluating the merits of this critical project and warrants being mentioned directly in Section 5.5 of the final EIS.

The Everglades Foundation again offers sincere thanks and congratulations to the United States Army Corps of Engineers for its expedited review of the EAA Reservoir. This effort demonstrates your organization's flexibility, commitment, and willingness to find cost-effective and implementable solutions to the dire environmental emergency facing South Florida.

Sincerely,

Shannon A. Estenoz
Chief Operating Officer
Vice President for Policy & Programs

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[1] The first bullet on page 5-12 contains a typographical error, referring to eminent domain as imminent domain. Additionally, while the state law did preclude the use of eminent domain for the project, the law specifically authorized additional land acquisition. Thus, the reference to the planning process being "restricted with regard to land" is confusing.

ECO-SCI

Stacie Auvenshine
U.S. Army Corps of Engineers
Jacksonville District, P.O. Box 4970
Jacksonville, FL 32232-0019
Re: EAA Reservoir Plan

Dear Ms. Auvenshine,

We are writing on behalf of the Ecological Sciences Communication Initiative, a nonprofit organization committed to transparent coverage of environmental issues. We are submitting this as a comment regarding the EAA Reservoir Plan..

We are writing to express our support for the R360D alternative as it includes holistic consideration towards the preservation of STAs and efficient use of space on the A-1 parcel needed to effectively treat water flowing from Lake Okeechobee to the Everglades, a place whose biodiversity is something Florida cannot afford to lose. In this implementation process, we encourage and respectfully request that the District to personally reach out and address the concerns of the communities surrounding the reservoir region before action is taken.

Moreover, while we are supporting implementation of R360D, we are also more generally in support of the EAA reservoir so long as the future of the Everglades is a consistent point of discussion before selecting a plan to move forward. We also appreciate the thoroughness of the 404(b)(1) analysis, and agree that the project will likely benefit all marine life in the area insofar as the STAs remain highly functional, going back to our advocacy of our preferred alternative R360D.

We sincerely thank the Army Corps of Engineers and the South Florida Water Management District in being timely and holistic in the approach of executing a solution to resolve the harmful effects of nutrient pollution in Lake Okeechobee.

For a healthier planet and warmest regards,

Rachel S. Walter
Senior Analyst
The Ecological Sciences Communication Initiative
8453 Winged Foot Drive
Fort Myers, FL 33967

Alex Ortiz
Executive Director
The Ecological Sciences Communication Initiative
2312 Nashville Ave
New Orleans, LA 70115

Stacie Auvenshine
U.S. Army Corps of Engineers Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019

July 24, 2018

Comments re: South Florida Water Management District Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area Draft Environmental Impact Statement

Dear Ms. Auvenshine,

On behalf of our millions of members and supporters, the National Wildlife Federation and Florida Wildlife Federation respectfully submit these comments for the record on the draft Environmental Impact Statement for the South Florida Water Management District Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area project. NWF has a long-standing history of working on conservation and restoration efforts nationwide, collaborating with 51 state and territorial affiliates, including Florida Wildlife Federation, to be a voice for wildlife – dedicated to protecting fish and wildlife, habitat, and inspiring the next generation of conservationists.

The National Wildlife Federation and Florida Wildlife Federation strongly support the swift advancement of the Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment Area. In what has become an annual summer crisis for Florida, toxic algal outbreaks continue to slime beaches, clog boat engines, kill fish, and pose a serious risk to public health. During summer rains, water is pumped from Lake Okeechobee through the St. Lucie and Caloosahatchee Rivers to relieve pressure on the aging Herbert Hoover Dike. When this polluted water reaches Florida's east and west coasts, it fuels algal outbreaks in delicate coastal estuaries, killing fish and wildlife, harming coastal economies, and damaging Florida's saltwater angling economy. The EAA reservoir, which was congressionally authorized in WRDA 2000, is a critical component of the Comprehensive Everglades Restoration Plan (CERP) that, in combination with previously authorized CERP projects, is intended to address this persistent crisis facing Florida's coastal estuaries every summer.

The primary goal of the EAA reservoir is to reduce the damaging high-volume discharges from Lake Okeechobee that currently overwhelm the Caloosahatchee and St. Lucie estuaries, causing the algal outbreaks that close businesses and threaten public health in coastal communities. Simultaneously, the project will store water from Lake Okeechobee and, in combination with other restoration projects, send water south to Everglades National Park and Florida Bay, where it is desperately needed.

As stated in the Executive Summary, the Recommended Plan, in combination with previously authorized CERP projects, approaches the CERP goal of approximately 80% reduction in

damaging discharges to the coastal estuaries "by providing a 55% reduction in discharge volumes and a 63% reduction in mean monthly high-flow discharge events to the Northern Estuaries from Lake Okeechobee. Salinity conditions in the estuaries would also be improved by reducing the number of Lake Okeechobee events that exceed the preferred salinity envelope by 45% in the Caloosahatchee Estuary and 39% in the St. Lucie Estuary" (SFWMD Section 203 EAA Southern Reservoir and STA Draft EIS pg 12). Reducing the volume of these discharges would have direct benefits for coastal economies, fish and wildlife, and water quality in the coastal estuaries. In addition to reducing the discharges to the coastal estuaries, the SFWMD Section 203 Preferred Alternative has the potential to deliver 370,000 additional acre-feet of water to the Everglades each year. This additional freshwater flow to the central Everglades is essential for native fish and wildlife habitat in the Everglades and in Florida Bay.

We note that concerns have been raised about the project's ability to meet the mandated Water Quality-Based Effluent Limit (WQBEL) while maintaining the level of benefits identified by SFWMD. It is imperative that the final EAA reservoir project be designed to meet water quality requirements in order to achieve the goals of Everglades restoration for both people and wildlife. National Wildlife Federation and Florida Wildlife Federation appreciate the Corps' attention to this concern in the draft EIS, as well as the state of Florida's representation, per the Department of Environmental Protection Secretarial Order, to take additional actions if necessary to achieve water quality requirements. NWF and FWF support this project based on the State's representation that the project benefits will be fully achieved while meeting the water quality standards, and that the project will be modified or expanded to meet these standards without compromising the identified project benefits.

There is an obvious and urgent need for the expedited planning and construction of this critical restoration project and we greatly appreciate the state of Florida's representation to moving this project forward quickly. By implementing this project, it will not only improve the health of the coastal estuaries, but will also enhance other restoration projects. Restoration projects south of Lake Okeechobee are critical to improving the health of Florida Bay, but in order to fully reach their restoration potential, they need an upstream source of clean, freshwater.

Sending clean water south is a critical component to getting the Everglades off life support and safeguarding Florida's outdoor heritage. Provided water quality requirements are met, the EAA reservoir is a step in that direction.

Thank you for the opportunity to comment on this important project.

Sincerely,

Manley Fuller
President
Florida Wildlife Federation

David Muth
Director, Gulf Restoration
National Wildlife Federation

SOUTH FLORIDA
WILDLANDS ASSOCIATION

P.O. Box 30211
Ft. Lauderdale, FL 33303

July 24, 2018

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 to 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, and the expanded Herbert Hoover Dike. It also needs make 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 the 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,

Matthew Schwartz
Executive Director
South Florida Wildlands Association
P.O. Box 30211
Fort Lauderdale, FL 33303
954-993-5351 (cell)

SOUTH FLORIDA
WILDLANDS ASSOCIATION

P.O. Box 30211
Ft. Lauderdale, FL 33303

July 24, 2018

Greetings:

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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 land – 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,

Matthew Schwartz
Executive Director
South Florida Wildlands Association
P.O. Box 30211
Fort Lauderdale, FL 33303
954-993-5351 (cell)

July 24, 2018

Stacie Auvenshine
U.S. Army Corps of Engineers
Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019
EAAReservoir@usace.army.mil

RE: Comments on the Draft EIS for the SFWMD Section 203 EAA Reservoir/STA Study

Dear Ms. Auvenshine,

On behalf of Sierra Club, Friends of the Everglades, and Bullsugar Alliance, we submit the following comments on the Draft Environmental Impact Statement (EIS) for the South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area (EAA) and Stormwater Treatment Area (STA) study.

Our organizations believe the EAA Reservoir is an integral component of the Comprehensive Everglades Restoration Plan (CERP) that, if adequately planned, designed and constructed, can help solve South Florida's ongoing water crisis and restore the globally unique and invaluable ecosystem, including Everglades National Park and Florida Bay. To that end, we desire to support and advance an EAA Reservoir project that provides the long-term ecosystem restoration benefits that both people and the natural system need, especially in light of the challenges South Florida faces with sea level rise and other climate changes, and that meets, with greater certainty, all applicable water quality standards. We also want to support a restoration project that does not pose unnecessary risk to the people and properties in and near the EAA and downstream of the project area.

We offer the comments below with the goal of seeing the SFWMD recommended plan (Alternative C240A) improved. Our comments are meant to address our concerns; they also echo a number of the concerns expressed by the Office of the Assistant Secretary of the Army for Civil Works (ASA) and the US Army Corps of Engineers (USACE) in their May 2018 Review Assessment of the SFWMD's recommended plan as described in their Section 203 Post Authorization Change Report (PACR), Integrated Feasibility Study and Draft Environmental Impact Statement (March 2018, amended May 2018):

1. When the Florida Legislature passed Senate Bill 10 (SB 10) in 2017 (Chapter 2017-010, Florida Laws), it was not its intent to take away the ability for SFWMD to analyze alternatives with a larger land footprint. SB 10 did not prohibit the modeling of project alternatives with private lands from owners that at the time of SFWMD's scoping phase had expressed no interest to sell or swap lands. Therefore, other possible alternatives should be evaluated as they might produce a project that is more economically feasible, safer, carries less uncertainty in cost and benefits, and provides greater ecological benefits. It is in the public interest, and certainly in the federal interest, to study the feasibility of other less land-restricted alternatives.

2. The study should include the feasibility of alternatives with reservoir options that are between six (6) and twelve (12) feet in water depth (depths that had been proposed in in 2000 and 2006) and that provide a minimum 240,000 acre-feet of water storage.

3. There is no legitimate reason to limit the feasibility study to alternatives within lands in state ownership in the A-1 and A-2 parcels and just west of A-2; nothing, including the removal of the eminent domain option in SB 10, imposed such a limitation. The study was overly restrictive in assuming that none of the current private landowners, in areas that could provide a more optimal footprint, would be willing to sell or swap land by the time the project is ready for the Pre-Construction Engineering and Design (PED) phase. Economics, politics, and other factors could motivate some of them to re-consider and sell or swap their lands with other state-owned land holdings. For instance, the state currently leases several thousand acres of land within or near the EAA with soils that are favorable to agriculture. It is premature to assume that no additional land can be acquired while the project is in the planning phase.

4. The SFWMD's work that led to the 2006 Revised Draft Integrated Project Implementation Report (PIR) and Environmental Impact Statement (EIS) for the Everglades Agricultural Area (EAA) Storage Reservoirs project, which had recommended a 12-ft deep reservoir, should be considered as an alternative.

5. All alternatives presented in the SFWMD feasibility study should include sufficient land to treat water to meet applicable water quality standards with a high degree of certainty. We share the concern stated in the ASA Review Assessment that the proposed project "poses a significantly high risk in feasibility, design, and construction in terms of cost and performance of a water quality treatment facility. This poses a significant risk that once constructed, the flows into the Everglades from this project will not meet water quality standards, and the project flows will be reduced significantly to meet those standards".

6. At this time we agree with the SFWMD decision to not re-purpose the existing A-1 Flow Equalization Basin (FEB) into either a reservoir or an STA as part of their recommended plan. Based on its current performance, the A-1 FEB is an important component of the Restoration Strategies Regional Water Quality Plan that is already operational. Meeting the Water Quality Based Effluent Limit (WQBEL) of the EAA STAs is of the utmost importance and there is land, other than the A-1, that should be utilized.

7. In the draft EIS and the SFWMD Section 203 report, the terms "CERP goal(s)" and "restoration target(s)" are referenced often to state how well the SFWMD recommended plan achieves or approaches them. These terms should be better explained for the benefit of a wide range of stakeholders, including decision makers, who may not be familiar with the technical aspects of how CERP is implemented and evaluated. If these numerical goals and targets are not clearly defined in the CERP Yellow Book, then the EIS needs to clearly articulate how and when these goals and targets were defined (including appropriate document references). It should also be clearer for the benefit of all stakeholders whether these goals and targets represent "interim" values versus final values.

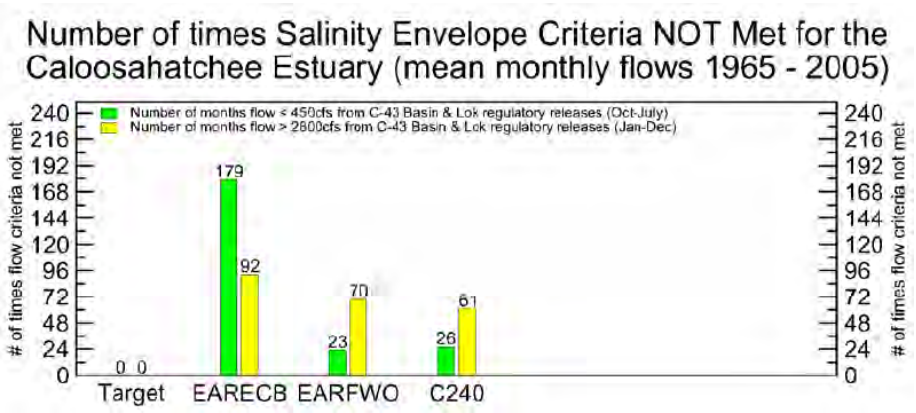
8. We agree with the USACE statement that "CERP identifies capacity for 360,000 acres [ft] of storage south of Lake Okeechobee, for Component G. Considering anything short of 360,000 acre [ft] storage option a final action could limit achievement of CERP goals related to Component G" (Section 3.1, draft EIS). As referenced in the draft EIS, the SFWMD Section 203 report has stated that its preferred alternative is "the final step," instead of "the next increment," towards implementation of Component G. Sierra Club agrees that the SFWMD recommended plan should not be considered the final increment of surface storage within the EAA.

9. It is not clear in the draft EIS, nor in the SFWMD Section 203 report, what the basis for SFWMD's assertion is that their preferred alternative is also the final implementation of the following CERP components. Clarification is needed with supporting details:
   - Flow to Northwest and Central WCA 3A (Component II)
   - Environmental Water Supply Deliveries to the St. Lucie Estuary (Component C)
   - Environmental Water Supply Deliveries to the Caloosahatchee Estuary (Component E)

10. We are pleased to see that the SFWMD's recommended plan provides a significant improvement of freshwater flows to the Everglades, above what CEPP was scheduled to provide, particularly during the dry season, from an average of approximately 210,000 ac-ft to 370,000 ac-ft annually.

11. The draft EIS states that, based on modeling with the 41-year period of record (1965-2005), the SFWMD preferred alternative (C240A) "meets" the CERP goal for average annual flows to the central Everglades. As stated, this is a great concern as this erroneously implies that the approximate 370,000 ac-ft increase in average annual flows to the central Everglades (via the C240A alternative) will be enough to meet the freshwater needs of South Florida's ecosystems. The 2014 CEPP PIR stated that since the formulation of CERP, published studies "estimate that the northern inflow to the Everglades was an average of two million acre-feet (ac-ft) annually" (pg. 3-3). The 2014 CEPP PIR (pg. 3-9) also states that "new science demonstrates that the need for flows passing through EAA is even higher than envisioned in CERP. This suggests that storage greater than 360,000 ac-ft, and necessary treatment, is likely needed if CERP goals and objectives are going to be fully achieved." Amplifying this concern is the fact that the modeling performed by SFWMD did not take into account the greater freshwater flows that will be needed to cope with climate changes already taking place, and accelerating, including sea level rise.

12. SB 10 had been introduced and passed in recognition that high-volume freshwater discharges to the St. Lucie and Caloosahatchee estuaries must be resolved. Therefore, project alternatives should provide significantly more reductions of these high-volume discharges above what the previously authorized CEPP and other authorized projects will provide (also referred to as Future Without, or FWO). Based on the information presented in Sections 3 and 4 of the draft EIS, the SFWMD C240A alternative, while it provides some added relief to both estuaries, the reductions are relatively minor in comparison to those provided by already authorized projects. To re-establish stable health to these estuaries more significant high-volume discharge reductions are needed. For instance, as noted in the model output figure below for the Caloosahatchee estuary, the high-volume discharges (with mean monthly flows above 2800 cfs) are only reduced by 9 months beyond the 22 months anticipated with CEPP and other authorized projects (FWO) (Figures 3-3, Tables 3-7 and 4-1, draft EIS). This still leaves 61 months of harmful discharges within the 41-yr period record. Again, while any relief to the estuaries is welcomed, project alternatives that provide higher benefits to the estuaries are needed.



13. The draft EIS does not clearly indicate to stakeholders what percentages related to reducing damaging discharges to the northern estuaries are benefits that were already predicted to be realized by CEPP versus those gained by SFWMD's recommended plan. The EIS should not make this ambiguous, particularly to the decision makers that need to evaluate the lift the recommended plan would provide. For instance, the draft EIS states (pg. 4-1) "compared to the No Action Alternative, the Recommended Plan provides an overall 55% reduction in discharge volumes and a 63% reduction in the number of discharge events to the Northern Estuaries from Lake Okeechobee, in conjunction with other authorized projects." For clarity and transparency, the report needs to include the portions of those percentages that are being realized by the recommended plan.

14. According the ASA Review Assessment of SFWMD's Section 203 report, the USACE, by May 2018, was scheduled to complete a climate change analysis required for feasibility studies in accordance with USACE policies. The results of that analysis, and the impacts to project benefits and the cost of SFWMD's recommended plan, need to be included in the EIS.

15. According to the draft EIS, SFWMD's recommended plan provides only minor benefits to nearshore Florida Bay (via Taylor Slough). This again highlights the need for alternatives that more meaningfully improve hypersalinity conditions in Florida Bay.

16. We agree with the concerns raised in the ASA Review Assessment in regards to analysis of potential failure modes, consequences of failure/life loss, and seepage analysis. These types of analyses are critical to ensure the stated ecological benefits of this project will be fully realized, to reduce risk in project costs, and to ensure the project is properly designed for the safety of people and property within and near the EAA and downstream of the project. According to the ASA report: "USACE has identified that there is significant risk that the 34% cost contingency currently in the cost estimate will not cover the additional cost associated with the likely design changes required to meet all standards after the proper analysis is completed… [USACE] identifies the submitted SFWMD recommended "tentatively selected plan" as presenting a "high" implementation and cost growth risk." This analysis should not be left to the PED phase due to the stated high risk that the estimated project cost contingency may not be enough.

17. The timeframe provided to external agencies for the Agency Technical Review (ATR) was extremely tight and particularly unfair to the local government agencies within the study area that were invited to participate. It is our understanding that the ATR kick off meeting was held Friday, February 16, 2018, just before the President's Day holiday, and that participants were asked to provide written comments by noon on Monday, February 26, 2018 (five business days later). This likely explains why only one county (Broward) provided written comments. In fact, in their comments Broward County (Carolina Maran) stated that "the established time frame was insufficient to provide the extensive review required for this type of document." Given the importance of this project to South Florida, adequate time should have been allocated to allow for careful review of the draft report and for meaningful input before SFWMD issued their final Section 203 report.

18. While public scoping meetings were held in later 2017 by SFWMD in West Palm Beach and Clewiston, they were inadequate in scope and timing. In addition, the SFWMD was repeatedly unresponsive to stakeholder information requests and questions. For example, Sierra Club submitted written scoping comments and questions to SFWMD on: November 22, 2017; February 9, 2018; February 22, 2018; and February 29, 2018 but received no responses. Please also note that the SFWMD neither included Sierra Club's pertinent correspondence nor addressed our questions and comments within their Section 2013 PACR report.

19. Neither SFWMD nor USACE provided meaningful and accessible NEPA-compliant in-person public participation in the stakeholder process to all those that stand to benefit, or be impacted, by this project. While public meetings were held in West Palm Beach, Clewiston, Fort Myers, and Stuart, both agencies failed to provide any public participation opportunities south of the reservoir project where restored water flows are intended to flow. In particular, residents of Miami-Dade and Monroe counties (where Everglades National Park and Florida Bay are located) were not afforded equal representation and equal opportunity for public engagement. This fact should be acknowledged in the EIS. The Southeast Florida region experiences significant traffic congestion during the times that SFWMD and USACE conducted its public hearings; as a result, hosting meetings in just the northern-most part of the project area was a barrier to public engagement that should have been avoided. We raised this concern several times because webcast recordings and SFWMD Governing Board meetings did not provide the kind of accessible, quality and open public engagement that others in the northern parts of the project area were afforded.

The above list is not a comprehensive coverage of our concerns but we look forward to providing additional comments on an ongoing basis as the process proceeds. Thank you for the opportunity to provide these comments.

Sincerely,

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Alan Farago
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Alex Gillen
Policy Director, Bullsugar Alliance
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Stuart, FL 34996
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(202) 747-4856

July 24, 2018

Stacie Auvenshine
U.S. Army Corps of Engineers Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019

Dear Ms. Auvenshine:

The American Sportfishing Association (ASA) appreciates the opportunity to provide comments on the Everglades Agricultural Area Storage (EAA) Reservoir and Stormwater Treatment Area project. ASA is the nation's recreational fishing trade association and represents sportfishing manufacturers, retailers, wholesalers, and angler advocacy groups, as well as the interests of America's 46 million recreational anglers, over 3 million of whom reside in or frequent Florida. ASA also safeguards and promotes the social, economic, and conservation values of sportfishing in America, which result in a $115 billion per year impact on the nation's economy. In Florida, the Fishing Capital of the World, this translates to a significant $9.6 billion economic engine supporting over 128,000 jobs and makes clean waters and abundant fisheries in the State of paramount importance to our industry.

As a result, we are committed to comprehensive Everglades restoration efforts and support expediting related projects whenever possible. Restoring the southerly flow of clean water from Lake Okeechobee (Lake) to Florida Bay (Bay) is critical to reducing the frequency and volume of releases to the Caloosahatchee and St. Lucie Rivers as well as to maintaining proper salinity and water quality conditions in the Bay. Once completed, restoration will mitigate the associated detrimental environmental impacts these systems currently experience from altered flows.

Providing water storage south of the Lake through the EAA Reservoir is an important component of the Comprehensive Everglades Restoration Plan (CERP). Expediting the completion of this project in conjunction with the Central Everglades Planning Project will significantly increase the southerly flow of clean water and reduce the duration and volume of releases from the Lake to the northern estuaries.

ASA strongly supports the EAA Reservoir and urges your swift and favorable consideration of the project and its substantial positive effects to the overall system. Once authorized by Congress, we urge the USACE to quickly move forward with this project in collaboration with the SFWMD, and request that upon completion, the Reservoir is operated in a way that maximizes environmental benefits.

AMERICAN SPORTFISHING ASSOCIATION
1001 N. Fairfax Street, Suite 501, Alexandria, VA 22314 • 703-519-9691 • Fax: 703-519-1872
Web: www.ASAFishing.org • Email: info@ASAFishing.org

ASA appreciates your consideration of our comments your continued efforts to restore Florida's Everglades.

Sincerely,

Kellie Ralston
Florida Fisheries Policy Director

From: Moreno, Meredith A CIV USARMY CESAJ (US)
To: Theodore Isham
Cc: Moreno, Meredith A CIV USARMY CESAJ (US)
Subject: RE: SNO Response to USACE Project at SFWMD Sec 203 EAA
Date: Thursday, June 14, 2018 9:33:11 AM

Good morning Mr. Isham,

Thank you for comments on the SFWMD Section 203 EAA Section 106 letter and upcoming Environmental Assessment. The USACE completed a Phase I cultural resources survey of the majority of the EAA area of potential effects in 2013. I will forward this report and all the previous correspondence that was conducted as part of the initial Central Everglades Planning Project study via AMRDEC SAFE as the files are too large to email. SFWMD is currently conducting cultural resources surveys of the remainder of the EAA area of potential effects. These surveys and the avoidance, minimization, or mitigation of effects to cultural resources will be coordinate with the Seminole Nation of Oklahoma, the Florida SHPO, and other interested Tribes prior to any undertaking. We appreciate your continued consultation on this project. Please do not hesitate to call or email with any further questions or concerns.

Thank you,

Meredith A. Moreno, M.A., RPA

Lead Archaeologist

Planning Division, Environmental Branch

Jacksonville District, US Army Corps of Engineers

Office: 904-232-1577

Mobile: 904-861-9967

From: Theodore Isham [mailto:isham.t@sno-nsn.gov]
Sent: Tuesday, June 12, 2018 10:20 PM
To: Moreno, Meredith A CIV USARMY CESAJ (US) <Meredith.A.Moreno@usace.army.mil>
Subject: [Non-DoD Source] SNO Response to USACE Project at SFWMD Sec 203 EAA

This Opinion is being provided by Seminole Nation of Oklahoma's Cultural Advisor, pursuant to authority vested by the Seminole Nation of Oklahoma General Council. The Seminole Nation of Oklahoma is an independently Federally-Recognized Indian Nation headquartered in Wewoka, OK.

In keeping with the National Environmental Policy Act (NEPA)d, and Section 106 of the National Historic Preservation Act (NHPA), 36 CFR Part 800, this letter is to acknowledge that the Seminole Nation of Oklahoma has received notice of the proposed project at the above mentioned location.

Based on the information provided and because the potential for buried cultural resources, the proposed project has an extreme probability of affecting archaeological resources, some of which may be eligible for listing in the National Register of Historic Places (NRHP).

We recommend that an intensive literature/phaseI survey reports of the nearby archaeological sites from the states master site files be completed and sent to SNO HPO.

Also, we request that all previous correspondence with the other tribes in the affected area be provided.

We do request that if cultural or archeological resource materials are encountered at all activity cease and the Seminole Nation of Oklahoma and other appropriate agencies be contacted immediately.

Furthermore, due to the historic presence of our people in the project area, inadvertent discoveries of human remains and related NAGPRA items may occur, even in areas of existing or prior development. Should this occur we request all work cease and the Seminole Nation of Oklahoma and other appropriate agencies be immediately notified.

Theodore Isham

Seminole Nation of Oklahoma

Historic Preservation Officer

PO Box 1498

Seminole, Ok 74868

Phone: 405-234-5218

Cell: 918-304-9443

e-mail: isham.t@sno-nsn.gov <mailto:isham.t@sno-nsn.gov>

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Encrypt Email:	False
Notification when Download Starts:	False
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Require CAC:	False

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Description
Cultural resources report of the EAA and correspondence from the CEPP EIS/feasibility study

File Information

File(s)	Privacy Act Data	Date Uploaded	
Appendix C.5 - FINAL Cultural Resource.pdf (17 MB)	No	6/14/2018 8:33:37 AM	View File Hash
(20373) Phase I EAA Cell A-2.pdf (10 MB)	No	6/14/2018 8:33:37 AM	View File Hash

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From:	Bradley Mueller
To:	Ralph, Gina P CIV USARMY CESAJ (US)
Cc:	Moreno, Meredith A CIV USARMY CESAJ (US)
Subject:	[Non-DoD Source] SFWMD - Everglades Agricultural Area Storage Reservoir and Storm Water Treatment Area
Date:	Monday, June 25, 2018 10:16:51 AM
Attachments:	image001.png image002.png

SEMINOLE TRIBE OF FLORIDA
TRIBAL HISTORIC PRESERVATION OFFICE
AH-TAH-THI-KI MUSEUM

TRIBAL HISTORIC PRESERVATION OFFICE

SEMINOLE TRIBE OF FLORIDA
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LAVONNE ROSE
SECRETARY

PETER A. HAHN
TREASURER

June 25, 2018

Ms. Gina Paduano Ralph, Ph.D.
Environmental Branch Chief, Planning and Policy Division
Department of the Army
Jacksonville District Corps of Engineers
P.O. Box 4970
Jacksonville, FL 32232-0019

Subject: SFWMD – Everglades Agricultural Area Storage Reservoir and Storm Water Treatment Area
THPO Compliance Tracking Number: 0030203-19

Dear Ms. Ralph,

Thank you for contacting the Seminole Tribe of Florida – Tribal Historic Preservation Office (STOF-THPO) regarding the proposed SFWMD – Everglades Agricultural Area Storage Reservoir and Storm Water Treatment Area undertaking. The proposed project does fall within the STOF Area of Interest. We have reviewed the document you provided and look forward to reviewing the results of any additional cultural resources investigations that may occur. We agree that continued consultation is needed so please feel free to contact us as needed. Thank you and feel free to contact us with any questions or concerns.

Respectfully,

Bradley M. Mueller

Bradley M. Mueller, MA, Compliance Supervisor
STOF-THPO, Compliance Review Section
30290 Josie Billie Hwy, PMB 1004
Clewiston, FL 33440
Office: 863-983-6549 ext 12245
Email: bradleymueller@semtribe.com

THLOPTHLOCCO TRIBAL TOWN

Tribal Historic Preservation Office

Terry Clouthier, Tribal Historic Preservation Officer

P.O. Box 188
Okemah, OK 74859
(918) 560-6113
thpo@tttown.org

June 29, 2018 THPO File Number: 2018-157

Gina Paduano Ralph
Chief, Environmental Brach
Department of the Army
Jacksonville District Corps of Engineers
701 San Marco Boulevard
Jacksonville, Florida 32207

RE: South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment Area (STA)

Dear Mrs. Paduano Ralph,

Thank you for contacting the Thlopthlocco Tribal Town Tribal Historic Preservation Office (THPO) regarding the preparation of NEPA documentation related to the feasibility study prepared by SFWMD. Our office has reviewed the document provided and offers the following comments.

We would like to continue our consultations for the remainder of this undertaking. Additionally, as additional documents are completed we would prefer to receive those documents via email whenever feasibly possible.

Please feel free to contact the THPO at thpo@tttown.org if you have any questions.

Please refer to THPO file number 2018 -157 in all correspondence for this undertaking.

Sincerely,

Terry Clouthier
Thlopthlocco Tribal Town
Tribal Historic Preservation Officer

FLORIDA DEPARTMENT of STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

Gina Paduano Ralph, Ph.D.
Chief, Environmental Branch
Jacksonville District Corps of Engineers
701 San Marco Boulevard
Jacksonville, Florida 32207-0019

June 27, 2018

RE: DHR Project File No.: 2018-2607, Received by DHR: May 24, 2018
Project: *South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment Area (STA)*

Dr. Ralph:

The Florida State Historic Preservation Officer reviewed the referenced project for possible effects on historic properties listed, or eligible for listing, in the *National Register of Historic Places (NRHP).* The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in *36 CFR Part 800: Protection of Historic Properties.*

A 2013 cultural resources assessment survey (CRAS) for a portion of the area of potential effect (APE) identified four archaeological sites (FMSF MS# 20373). Of particular concern are sites PB16039, which is considered eligible for listing in the NRHP, and PB16040, which currently has insufficient information to make a determination of eligibility for listing in the NRHP, but does include documented human remains. Both sites should be considered as planning for the project continues. Additional work will be necessary to evaluate PB16040, if effects to the site cannot be avoided by project activities.

As stated in your letter, an additional CRAS will be necessary to identify and document cultural resources within the final APE and additional Section 106 consultation will occur during the pre-construction engineering and design (PED) phase. We look forward to continuing consultation with the Corps and encourage the Corps to complete any additional cultural resources assessments early in the PED phase to ensure inclusion of all cultural resources throughout the planning phase.

If you have any questions, please contact me by email at *Jason.Aldridge@dos.myflorida.com*, or by telephone at 850-245-6344.

Sincerely,

Jason Aldridge

Timothy A. Parsons, Ph.D.
Director, Division of Historical Resources
& State Historic Preservation Officer

GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

Writer's Direct Dial Number: (954) 468-1363
Writer's E-Mail Address: rburgess@gunster.com

October 7, 2019

VIA E-MAIL ONLY: KRISTA.D.SABIN@USACE.ARMY.MIL

Department of the Army
Attention: District Engineer
c/o Ms. Krista Sabin
U.S. Army Corps of Engineers
Jacksonville District
Palm Beach Gardens Permits Section
4400 PGA Boulevard, Suite 500
Palm Beach Gardens, Florida 33410

RE: United States Sugar Corporation's Comments on the Corps' Public Notice for the A-2 Stormwater Treatment Area (STA), SAJ-2018-03427(SP-KDS)

Dear Ms. Sabin:

This firm represents United States Sugar Corporation ("USSC"), an interested stakeholder in issues related to management of Lake Okeechobee ("Lake"), including the Comprehensive Everglades Restoration Plan ("CERP") and all of its incremental components. On September 5, 2019, the U.S. Army Corps of Engineers ("Corps") published notice of the above-referenced permit application (referred to herein as the "Public Notice"). On behalf of USSC, please accept the following timely submitted comments and add this letter and all attachments into the A-2 STA Project administrative record.

As a landowner in the Everglades Agricultural Area ("EAA"), USSC has a substantial interest in the proposed A-2 STA Project. Farming in Florida since 1931, USSC owns and farms approximately 245,000 acres of farm lands located Glades, Hendry, Palm Beach, and Martin counties. The farmers in the EAA have participated in Everglades restoration, paying an agricultural privilege tax (a tax unique to the EAA) to support Everglades restoration, investing more than $400 million in restoring and preserving the Everglades, and implementing the most successful and well documented EAA Best Management Practices program, reducing phosphorus loads in stormwater runoff by a long term average of 57 percent. USSC has a substantial interest in the availability of irrigation water for its crops and the success of water quality improvements in the region. USSC requests the Corps consider the following matters as it considers permitting the A-2 STA.

USSC Supports the CEPP Project in which the A-2 STA Is a Component

USSC supports the proposed CERP project as described and approved in the Central Everglades Planning Project ("CEPP") Post-Authorization Change Report ("PACR"). The design in the approved PACR includes both an A-2 Reservoir, designed to store excess Lake water during times of damaging estuary releases, and an A-2 STA, designed to treat water stored in the A-2 Reservoir before release. The PACR analyzed the selected alternative, C240A, and its operational plan was premised and approved on both components operating together. The PACR only studied implementation as part of the larger and carefully sequenced CEPP project and did not allow for out of sequence operations.

Putting the A-2 STA Project First in Sequence Raises Questions About the Corps' and State's Ability to Satisfy State and Federal Law on Water Supply and Water Quality

SFWMD has expedited its efforts to construct the A-2 STA, building it out of sequence with the remainder of the overall EAA Reservoir CERP Project. The recent working version of the draft Integrated Delivery Schedule included a construction start date for the A-2 STA in 2020, and SFWMD applied for the above-referenced Corps' permit, indicating that SFWMD intends to construct and operate the project in the near future, and will likely do so prior to construction and operation of the A-2 Reservoir component of the project. Indeed, the Public Notice itself injects uncertainty as to whether the A-2 Reservoir component will be constructed, stating in the Overall Project Purpose, "To provide water quality improvements to the **Miami Canal**. In addition **if the Corps constructs the proposed A-2 Reservoir**, the overall project purpose would include improving water quality and assisting in achieving the water quality based effluent limitation (WQBEL) for water discharged from the A-2 Reservoir." (emphasis added).

To date, the design and planning has not considered a standalone A-2 STA, and the operational plan for the A-2 STA has not been provided to the public. The A-2 STA is only being built because it is part of the EAA Reservoir CERP project. The CEPP PACR analyzed the selected alternative, C240A. In analyzing the effects of this federal action, the Corps should study and model the operational plan for the A-2 STA as a standalone feature and ensure state and federal law are satisfied in the operational plan. The public should have the opportunity to review the operational plan for the A-2 STA prior to its construction. Similarly, the operational plan should be considered as part of the state water quality certification for this permit as referenced in the Authorization from Other Agencies heading of the Public Notice. Any limitations on A-2 STA operations that are necessary to satisfy state and federal law should be included as permit conditions in accordance with 33 C.F.R. § 325.4.

Proper sequencing of the CEPP components is essential to achieving water quality standards. When other CEPP components were constructed out of sequence, for example, the S-333N, permit conditions were necessary to ensure operations do not contribute to water quality concerns. Lake operations in recent years sent large amounts of water south through the existing

STAs, overloading them.[1] Overloading the STAs beyond their designed capacity for Lake water risks potential water quality violations of the existing STA permits, the federal 1992 Consent Decree, and the assumptions in Restoration Strategies, which supported resolution of the litigation over the STA discharges.[2] Continued operations sending hundreds of thousands of ac-ft of Lake water to the STAs threaten existing STA operations. While it is not clear what the source of the water for the A-2 STA will be (the Public Notice only states the Miami Canal), if the State and the Corps propose to send Lake water to the A-2 STA, without the benefit of the A-2 Reservoir component, permit conditions relating to operations to protect water quality and water supply would be needed. Conversely, if the State and Corps do not intend to send Lake water to the A-2 STA, then permit conditions should be included to confirm same. Water quality and water supply were specifically addressed in the Florida Department of Environmental Protection's CEPP PACR Final Order dated March 5, 2018, but only as to the selected approved alternative, *i.e.*, both components operating together.

The State and the Corps Must Undertake an Updated Saving Clause Analysis to Ensure Water Supply Is Protected

An updated State and Federal Savings Clause analysis must be performed to provide reasonable assurances of meeting State and federal CERP permitting requirements and the FDEP's CEPP PACR Final Order noted above.[3] During periods of low lake stage or drought conditions, the STAs become a water user; requiring deliveries of water to prevent dry-out and the resultant first-flush release of phosphorus upon re-wetting. The water supply source for the A-2 STA remains unclear and is of particular interest in light of both the interim LORS08 and upcoming "LOSOM" Lake regulation schedules. Also, CERP projects require assurance of project benefits to both the natural system and human environment, and it is unclear whether these assurances been provided. As to the human environment, before eliminating or transferring water as a result of implementing the A-2 STA, the lost water must be identified along with a new water supply source of comparable quantity and quality. Further, State law requires assurance the quantity of water available to existing legal users shall not be diminished by implementation of a project component. The Public Notice did not identify what documentation the State has provided in this regard.

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[1] LORS08 EIS includes STA Lake release design capacity of approximately 60,000 ac-ft per average year to STA 3/4. The Restoration Strategies Plan, when fully constructed, has a full suite of infrastructure designed to treat approximately 87,000 ac-ft per year of Lake Okeechobee water. *See, e.g.*, Restoration Strategies Regional Water Quality Plan, dated April 27, 2012, prepared by South Florida Water Management District. Lake operations in recent years have sent significantly more water to the STAs, approximately 200,000 to 300,000 ac-ft per year of Lake Okeechobee water. *See* August 8, 2019 South Florida Water Management District Governing Board Presentation, "Overview of Efforts to Achieve the Water Quality Based Effluent Limit for the Everglades Stormwater Treatment Areas".

[2] The 1992 Federal Consent Decree was entered in *U.S. v. South Florida Water Management District*, Case No. 1:88-cv-01886-FAM; the litigation over STA discharges was in *Miccosukee Tribe of Indians of Florida v. U.S.*, Case No. 1:04-cv-21448-WPD.

[3] The federal Savings Clause is codified at Section 601(h)(5) of the Water Resources Development Act of 2000, Pub. L. No. 106-541, § 601, 114 Stat. 2690 (Dec. 11, 2000). The state Savings Clause is codified at Section 373.1501(5)(d), Florida Statutes.

Conclusion

USSC looks forward to continued participation in CERP Project planning and implementation and appreciates Corps' consideration of these comments.

Sincerely,

Rick J. Burgess
Gunster Law Firm
Attorneys for the United States Sugar Corporation

Cc:
Client
SFWMD Executive Director, Drew Bartlett
SFWMD Governing Board members
FDEP Secretary, Noah Valenstein

Responses to Comments on the May 2018 SFWMD Section 203 EAA Southern Reservoir and STA Draft EIS

Many comments received throughout the comment period had a similar theme, therefore, the excel comment matrix has your comments listed, with "x" marks placed in a column with a common theme or thread. The following document is a response to those comments, in an attempt to be complete, concise, and consistent with our responses and not repeat responses within the matrix. The Corps and SFWMD are working within our means and applicable laws to restore the Everglades through implementation of CERP, and the proposed reservoir and STA will help reduce the frequency of freshwater releases from Lake Okeechobee to the estuaries. Although the project will not eliminate the releases, it will address ecosystem restoration.

CERP is being implemented as part of an adaptive management approach that recommends changes to plan and project implementations to further improve performance towards ecosystem restoration goals based on science-based monitoring feedback. The 2014 System Status Report (https://evergladesrestoration.gov/ssr/2014/ssr_full_2014.pdf) concluded that estuaries do recover with ideal lake level and rain conditions and minimized water releases from the lake and watershed to the estuary. With the addition of CERP projects, the Corps and SFWMD expect the estuaries to improve and recover due to the projects ability to move more water south for Everglades restoration.

Many of the comments received included concerns regarding the sugar industry in Florida, and the lack of regulations that require agriculture to clean up the water that ends up in Lake Okeechobee, as well as using agricultural land for the placement of a larger reservoir or storage solution. The Corps does not control the quality of the water which enters or exits the system, including water from agricultural lands. Instead, the primary lead with authority for managing the nutrient levels and overall quality of the water entering Lake Okeechobee and surrounding watersheds is the State of Florida. As such, the Corps relies upon the appropriate state agencies to determine the quality of the water and to ensure the water meets acceptable state water quality standards.

Legislation would be required to establish new local, state, or Federal laws addressing agriculture and runoff impacts to water quality. If there are concerns about local, state, or federal water laws, the best course of action is for the concerned party to contact their local legislative delegation and/or congressional representative(s).

Comment Response by Topic (in correspondence with excel sheet of comments):

Water Quality Concerns for the St. Lucie and Caloosahatchee Estuaries:
The Corps is not the responsible authority to manage water quality in the State of Florida but works closely with the FDEP (water quality authority in the State of Florida), SFWMD, Local Counties and Department of Health in the process of making Lake Okeechobee release decisions. Algal bloom growth is a complex process primarily encouraged by a number of interacting factors including, high temperatures, stagnant water conditions, long sunny cloud clear days, clear water/low turbidity, high nutrient levels, reduced SAV/EAV, and the amount and type of algae present. Local runoff, which varies depending on rainfall patterns, is the main source of nutrients in the Caloosahatchee and St Lucie Estuaries. Controlling nutrient loading from upstream land uses (e.g., septic tanks, golf courses, residential areas and agricultural areas) into local runoff is not within the authority of the Corps.

For public health and safety concerns, the FDEP and FDOH have legislative authority over human health and safety issues associated with degraded water quality. These state agencies, along with local governments, work together to monitor water quality and issue public notices when water quality concerns are identified.
The Corps operates Lake Okeechobee in accordance with LORS 2008 to balance multiple project purposes, which include flood control, navigation, water supply, enhancement of fish and wildlife, and recreation. Lake Okeechobee regulatory releases to the estuaries are made in accordance with the 2008 LORS to address two main objectives: 1) reduce risk to human health and safety from potential HHD failure and associated flooding; 2) environmentally beneficial flows to the Caloosahatchee Estuary. While water quality is a consideration, addressing water quality is not a federally authorized project purpose and is not a primary factor in determining how much water to release. LORS 2008 was developed with a focus on reducing high lake stages as the primary factor of our decision to reduce risk of HHD failure. Water quality effects of LORS were evaluated in the 2008 LORS schedule and Final Environmental Impact Statement. At that time, the rate of nutrient loading into the lake was 5 times higher (714 metric tons per year) than the Florida Department of Environmental Protection set total maximum daily load (TMDL) of 140 metric tons per year. While the state has been implementing plans to reduce nutrients into Lake Okeechobee, the nutrients are still high, with the phosphorus loading rate still routinely exceeding the state TMDL by a factor of 3-4 times, which has the potential to promote algal blooms including those species that are harmful. Understanding that nutrients are a concern for the estuaries, in accordance with LORS 2008, Lake Okeechobee releases are generally only made if the LORS schedule calls for releases to reduce risk of high lake stages or if there is an environmental need for additional water in the estuary. There are situations where releases to the estuary are made to reduce Lake Okeechobee stage to improve lake ecology if outside of period of record events occur and have damaged lake vegetation. Also, Lake Okeechobee releases are only a small portion of the nutrient loading sent to the estuaries. Over the past five years (WY2014 to WY2018) the St. Lucie Estuary received approximately 36% of the nitrogen load and 23% of the phosphorus load from Lake Okeechobee. The rest is from the St. Lucie basins and tidal basins (SFWMD 2019). For the Caloosahatchee, Lake Okeechobee contributed 41% of the nitrogen load and 30% of the phosphorus load over the past five years (WY2014 to WY2018). The remainder of the nutrients entering the Caloosahatchee Estuary come from the Caloosahatchee basins and tidal basins (SFWMD 2019). Lake Okeechobee releases combined with downstream local basin flow contribute to freshwater conditions that may allow naturally occurring harmful algal bloom (HAB) species to thrive, but flows are also needed in some circumstances to balance salinity levels in the estuaries. Based on recent experience and scientific recommendations from 2016 as part of the stakeholder feedback process called for under LORS, pulsing the regulatory releases from Lake Okeechobee may help reduce the negative effects from estuarine HAB (Corps Periodic Scientist Calls, 2016). Periods of low or no flow can allow normal tidal flushing to move saline water back into the estuary and then allow flushing of some excess nutrients to tide and kill the harmful microcystis algae.

The Corps has responsibility to provide flood risk management and reduce the overall risk of unsatisfactory performance of the HHD dam to a tolerable level, in accordance with the Corps' Engineer Regulation 1110-2-1156. As prescribed by the 2008 LORS, which was implemented as an Interim Risk Reduction measure for the HHD, Lake Okeechobee releases to the estuaries are required under certain conditions to provide flood risk management and prudent safety factors for the HHD dam. The HHD is the primary infrastructure containing the waters of Lake Okeechobee, and is undergoing rehabilitation to minimize risks to public safety and provide an increased level of economic, social and environmental security in the region. Remediation of the HHD, which is presently planned for completion in 2022, will significantly reduce the risk of life loss, economic and

environmental damages to the communities surrounding the lake as well as catastrophic impacts to the Everglades. The Corps works closely with the SFWMD to maximize Lake Okeechobee releases to the south, dispersed water management and any other avenues other than release to the St. Lucie or Caloosahatchee estuaries. The decision-making process for Lake Okeechobee water management operations considers all Congressionally-authorized project purposes in accordance with LORS 2008. The decision-making process to determine quantity, timing, and duration of the potential release from Lake Okeechobee includes consideration of various information related to water management. This information includes but is not necessarily limited to: C&SF Project conditions, historical lake levels, estuary conditions/needs, lake ecology conditions/needs, WCA water levels, STA available capacity, current climate conditions, climate forecasts, hydrologic outlooks, projected lake level rise/recession, and water supply conditions/needs.

Septic systems are recognized as one potential factor impacting water quality in the project area. Failing septic system discharges along with local runoff have been determined to be a key factor in encouraging algal blooms in the St. Lucie estuary and a similar situation is expected to exist for Caloosahatchee estuary. No fecal coliform has been linked with Lake Okeechobee discharges. Exceedance of fecal coliform water quality standards associated with failing septic systems have also been identified as a water quality concern in the Caloosahatchee and St. Lucie Estuaries. The FDEP and FDOP are the regulatory agencies for permitting septic systems and resolving concerns septic system regarding failing septic systems.

Restoration Coordination and Verification Studies

The 2014 System Status Report (https://evergladesrestoration.gov/ssr/2014/ssr_full_2014.pdf) concluded with the addition of CERP projects, the Corps and SFWMD expects reduced high water discharges to the estuaries, allowing them to improve and recover. The studies and findings concluded that with the correct rain conditions, the estuaries were showing improvement in 2012-2014. With more projects to store water during the rainy seasons, less water will need to be released to the estuaries.

Excerpt from Northern Estuaries Introduction (2014 SSR): "Freshwater flows into the Southern Indian River Lagoon affect turbidity, color and nutrients, which in turn affect light available to submerged aquatic vegetation. Of these parameters, color and turbidity appear to be the key parameters controlling light attenuation. Additionally, freshwater discharges reduce the normally high lagoon salinities. Changes in aquatic resources in the St. Lucie Estuary were ultimately a response to reduced rainfall in Water Year (WY) 2011 and early WY 2012. The total amount of fresh water entering the two estuaries was less than the long-term average and particularly reduced in WY 2012, when there were no discharges from Lake Okeechobee. In turn, reduced freshwater input drove salinity increases during the WY 2011 dry season and the beginning of WY 2012. In response to increased salinity, numbers of the eastern oyster increased as did salt-tolerant seagrasses such as shoal grass and manatee grass. Total nitrogen and total phosphorus loadings to the St. Lucie Estuary were less than the long-term averages, respectively, thereby reflecting reduced basin runoff and inflows from Lake Okeechobee. Additional water quality information can be found in Chapter 10 of the *2013 South Florida Environmental Report – Volume I* available at www.sfwmd.gov/sfer."

Solution is too small:

The targets identified in CERP, as authorized in section 601 of the Water Resources Development Act of 2000, are being met by this Recommended Plan to provide more freshwater going south. Planning efforts are also currently underway for the Loxahatchee River Watershed Restoration Project (LRWRP), the Lake Okeechobee Watershed Restoration Project (LOWRP), and the Lake Okeechobee System Operating Manual (LOSOM), which

will replace LORS 2008.The preliminary project area for the LOWRP, where the placement of features including additional basin storage will be considered, covers a large portion of the Lake Okeechobee watershed north of the lake. The LOWRP aims to improve the quantity, quality, timing and distribution of water entering Lake Okeechobee; provide for better management of lake water levels; reduce high-volume releases to the Caloosahatchee and St. Lucie estuaries downstream of the lake; and improve system wide operational flexibility. The commitment by the USACE, SFWMD, and DOI to prioritize this Central and Southern Florida, Everglades Agricultural Area, Florida project, LRWRP, and LOWRP to achieve CERP restoration objectives at the earliest practicable time (consistent with funding constraints and the interdependencies between project components) were identified in the recent South Florida Ecosystem Restoration Integrated Delivery Schedule (IDS-2019) update and these future projects will focus on areas that will complement ongoing restoration efforts to the east of the lake (*i.e.* Indian River Lagoon South Project (C-44 Reservoir)), west of the lake (*i.e.* Caloosahatchee (C-43) West Basin Storage Reservoir) and south of the lake (*i.e.* Central Everglades Planning Project (CEPP)). The CEPP project authorized in 2016 included storage of approximately 56,000 ac-ft of additional water in a flow equalization basin (FEB) that could be sent south to improve hydropatterns in the WCA 3 and the Everglades. CEPP did not identify a need for or include a stormwater treatment area (STA) to meet the State of Florida water quality based effluent limits (WQBEL). The recommended plan analyzed in this Final EIS includes the ability to store approximately 240,000 ac-ft of additional water (329% more storage than CEPP (2014)), and includes an additional STA that would treat the additional increment of "new" water (beyond what was authorized in CEPP in 2016) to meet the WQBEL. Improvements to conveyance in the North New River and Miami Canals are also included in the recommended plan to meet conveyance needs to move the additional water south from Lake Okeechobee, and, therefore, the project is large enough to handle and treat the additional water and provide the additional water deliveries south in accordance with the CERP.

Solution takes too long/Immediate action is needed to clean water:
Because this is a Federal project, the typical timeframe includes an analysis of project feasibility and developing a range of alternatives, as required by the National Environmental Policy Act (NEPA). Concerns raised during the feasibility study must be resolved before the NEPA can be completed. Once the feasibility study and NEPA process are complete, the project then goes to Congress for authorization. Once authorized, the project then needs appropriations through a Water Resources Development Act (WRDA) in order to receive the funds needed to complete the rest of the appropriate analyses, design, and environmental coordination. While it is a lengthy process, the Corps and SFWMD are working within our means and applicable laws in order to develop a project that is beneficial for ecosystem restoration (i.e., decreasing flows to the estuaries and increasing freshwater flows to the Everglades) and addresses and/or resolves, to the maximum extent practicable, potential adverse environmental impacts. Prior to construction, the Corps must also ensure the project's environmental compliance with all applicable Federal laws and Corps policy, and consult with Federal and State Agencies, Tribes, and interested stakeholders

Stop sending water to estuaries, send south to Everglades:
The goal of CERP, and this Central and Southern Florida, Everglades Agricultural Area, Florida project, is to reduce the flows to the estuaries and increase flows to the Everglades. While it is impossible to discontinue all releases to the estuaries at this time under current and planned features of CERP (as identified and authorized by the 2000 CERP authorization), this project would benefit the estuaries and the Everglades by reducing the frequency of releases to the estuaries, and increasing the amount of water sent south to restore historical flows to the Everglades. The proposed STA would treat the water to improve water quality prior to releasing the water south so that applicable water quality standards would be met. Currently, the water within Lake Okeechobee is received primarily from direct rainfall and runoff from areas north and west of the Lake. See the water quality response for additional information.

	If your comment has an "x" in columns C, D, E, F, or G), please see the corresponding word document for a response. This project had many similar comment themes, and therefore, the responses are located in a word document.							
Commentor	**Comment**	Polluting estuaries, water quality concerns	Solution too small	Solution takes too long/Immediate action needed to clean water and/or stop releases	Support	Stop sending water to estuaries, send south to Everglades	Other (please see Additional Response Column)	**Response**
Celeste DePalma	Celeste DePalma with Audubon Florida for the record. I just want to thank the District's staff for working expeditiously to put the packer ready (phonetic). And I also want to thank the Corps because I know that you guys have been trying to keep up with these, and it's a very hard process. I also want to make sure that I thank the Assistant Secretary of the Army's commitment to working for Florida on this very important project. And the only thing that I want to say was I think that we've been trying to push water away for a really long time. And we're -- we're living through the consequences of pushing water away and the implications to the system. And a long time ago we all came to the realization that that's not the best in Florida's interest and solutions for the Everglades Restoration, to put the water back where it belongs. And every summer, especially during the last three summers, we're reminded of why the Everglades Restoration is going and get this project in the ground. And now, more than ever, getting the EEA reservoir ready to increase the storage of the system and facilities is more important than ever. So I stand here today on behalf of Audubon really excited to get this project moving forward. And I want to urge the Corps to work expeditiously on the review to make sure that Congress gets to review this project and -- the project and consider it for this year's Water Resources Development Act so that it can get authorized, and you can get it on to the next phase. And, to that end, we stand ready and able as allies to engage with the Corps and with the District when we get into the planning and design phase. And we would like to make sure that, when we get there, the project gets adequate water quality so we can get all the benefits that the project promises and relief that our estuaries and that our environmental relief are eagerly waiting to get. Thanks so much.				x			Thank you for your comment and support. We will work to get this report to Congress for consideration of this year's WRDA. Thank you for standing by as allies for the next phase, for the certainty of the project receiving adequate water quality.
Nyla Pipes	So I would like to echo everything that Celeste just said. I think it's really important to move forward with this project, that we remember that we all came together and we worked out something that seems to work for all communities. Speaking of -- and this is where we get into the question part of things. I know, in the coastal communities particularly, there's a lot of concern that changing the footprint the way we did, making the reservoir, you know, walls higher, making it deeper, changing some of those things may have affected the way we handle water quality. So that is a question that a lot of people still have on their minds that I think we need to be sure we address every step of the way so that we don't end up sending more water south that isn't ready to go south because we all know it can't go to the park, and it will just continue to stack up. So water quality is a great concern and is a big question mark for a number of people. I, myself, personally and One Florida, we are confident that the planning moving on with South Florida Water Management District and the review process you guys are going through has accounted for that. But just let us know how we can help to push this through to get that water bill. Thank you.				x		x	State of Florida water quality standards will be met prior to sending water into the Everglades. Additional modeling or analysis may be necessary during the next phase of this project to ensure State of Florida water quality standards are met.
Representative Gayle Harrell	Thank you very much. And I am delighted that you are here to hear the public, and I want to thank the public for coming out tonight. I just got back from DC with the River Kids. And we had an interesting conversation with the Army Corps up in DC as well as various legislators there. We certainly -- the State of Florida certainly endorses this program. We totally support it. The state is putting eight hundred million dollars into this project. We feel that this reservoir is a key component of the entire Comprehensive Everglades Restoration Program and specifically to stop the releases from Lake Okeechobee. Through Legacy Florida, we are putting over two hundred million dollars a year for the next eighteen years into stopping the releases from Lake Okeechobee. I think that is the key reason many of us are here tonight. And I have -- in addition to my comments relative to the reservoir, I would like to make a few comments and recommendations to the Army Corps regarding the releases from Lake Okeechobee and specifically the algae blooms. I have a detailed letter which I will leave with you with those recommendations. They include, number one, seeking an executive order from the President of the United States to temporarily halt -- to temporary -- temporarily override the Lake Okeechobee Regulation Schedule, known as LORS, to permit additional water to be temporarily held in the lake and stop the releases from Lake Okeechobee. I would further recommend that you authorize the required study to permanently adjust the Lake Okeechobee Regulation Schedule to be conducted concurrently with the Herbert Hoover Dam Dike repairs that are underway, thereby accelerating a permanent change to the LOR Schedule. Also I believe that there's more water that can be moved south by opening S-12 and A and B structures and permit Water Conservation Area, W -- WCA 2-A to hold more water. I also would recommend that you only do --you allow for the temporary halting of any releases and proceed to flush. Give us some break. Only do this on a -- a schedule which allows releases only when necessary and then a break for at least five days so that our rivers are able to flush, we're allowed to have the saltwater come back in and that we can clean the algae. And I will leave this with you. We appreciate you being here, and thank you for allowing the public to comment. And we are all very involved and concerned about this issue and wish to work with you as you move forward. Thank you.				x		x	Thank you for your comment, the Jacksonville District manages Lake Okeechobee in accordance with the 2008 Lake Okeechobee Regulation Schedule (LORS). This document included input from stakeholders affected by the Corps' water management practices. Through LORS, the Corps balances the authorized purposes of Lake Okeechobee in making its water management decisions. These purposes include flood control, water supply, and environmental considerations. LORS considers the current lake level, the current inflows, and the forecast for the coming days, weeks, and months to provide a recommended decision path for consideration. The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms.
Charles Grande	First of all, I wanted to thank you for your presentation this afternoon. It was a wonderful presentation, very well received. The EAA Reservoir is going to be the best thing as far as affecting the discharges. But, just as LORS controls the lake, the EAA Reservoir will be controlled by an operations schedule. And the one thing that can really help us is if that operations schedule mandates that the amount of water that goes into the EAA Reservoir has got to be equaled by water coming out of Lake Okeechobee and going south into those two canals. That will mean that the EAA Reservoir actually does what it was intended, to stop the discharges, rather than providing additional drainage to the EAA area which is already sufficiently drained. So the key is the COP, or the operations plan, needs to mandate that, for every acre-foot that goes into the EAA Reservoir, an acre-foot has got to come out of Lake Okeechobee and go south. Thank you.				x	x	x	If approved by Congress, the Section 203 EAA Reservoir and Stormwater Treatment Area will be an amendment to the Central Everglades Planning Project (CEPP). CEPP includes potential revisions to the 2008 LORS to include how water would be moved into and out of a proposed storage reservoir. If the project receives Congressional approval and once a final engineering design is completed, an operational plan will be developed to maximize storage potential and benefits to be obtained through construction of the project.
Joe Gilio	I second the comments made by Representative Harrell and by Charles Grande. My concern is this. Thirty-nine percent of reduction in the salinity envelope critical to life in the St. Lucie Estuary is probably the same thing true for the Caloosahatchee. However, who is the pusher? Who is the initiator of improvements over and above this? Because what I read was fifty-five percent volume reduction into both Caloosahatchee and St. Lucie, fifty-five percent reduction from Lake Okeechobee only is insufficient because it contains between sixty-five and eighty-five percent of the suspended solids, which is the muck, which drowns everything out. Therefore, what we need is this, to me, should be -- I'm not knocking the project, decent project. However, how is this project going to be implemented further in the next WRDA rendition to get ninety-five percent reduction so that the rivers can actually restore because fifty-five percent reduction is insufficient. That's my question. Oh, and, by the way, I did send to Stacie and to South Florida my idea on how to improve this.				x		x	The Comprehensive Everglades Restoration Plan (CERP) was authorized in the Water Resources Development Act of 2000. CERP contains 68 projects which collectively are designed to reduce discharges to the northern estuaries and send more water south through the Greater Everglades to Everglades National Park and Florida Bay. The Section 203 EAA Storage Reservoir and Stormwater Treatment Area is one step in helping to reduce flows to the estuaries and improve flow south.
Tamara Phillips	Good evening , everybody. Thank you very much for being here. I think we all really need to try to understand this better. I have many questions. But one is nonfederal interests are going to be involved in the process. Who exactly might those nonfederal interests be?						x	The Non Federal Interest that is requesting the Section 203 project is the South Florida Water Management District.

Commentor	Comment	Polluting estuaries, water quality concerns	Solution too small	Solution takes too long/Immediate action needed to clean water and/or stop releases	Support	Stop sending water to estuaries, send south to Everglades	Other (please see Additional Response Column)	Response
Maggy Hurchalla	You are the agency that is stuck with implementing Everglades restoration. And you need to make sure that the project will work. We want the solution. We want the solution in a hurry. We need the solution in a hurry. But we equally want it to work, and we're depending on you to make it work. I am painfully familiar through the CERP process we did with the governor's commission that average annual flow decreases are not what we measure in CERP, that reduction in discharge or static holding of a reservoir is not what we measure. What we measure is how often will the grass beds be destroyed. What we measure are things that happen in the actual environment. And so we're going to depend on you to make sure that this project, without telling you exactly how to do it, does meet the full goals of CERP so that, when we're through putting it all together, it works. I'd have three simple things. The EAA Reservoir has to be in the WRDA bill. No excuses. Do everything you can to help us make that happen. Number two, we look to the Corps to ensure the reservoir is designed to deliver clean water south. Not some clean water. Not, gosh, we could meet the original goals of CERP but we're in a hurry, but to actually make CERP work. This is the key component of CERP that, if it doesn't work, Florida Bay dies. Miami loses its water supply. Everglades National Park dies and our estuaries die. I would ask you to make a full review -- 180 days is a short time -- but a full, honest technical and scientific review and then to solve all of those problems in time to get it in WRDA. I realize that is a tremendous challenge. We're depending on you to do it. Number three, this has been a cooperative process -- well, this has to be a cooperative process; and it has to have very stringent peer review. In no way -- and I would say this to everybody in the District who is here and everybody in the Corps -- can this be the District versus the Corps or the Corps versus the District. In no way are we asking either of you to give up what will make CERP work. And so we're depending on you to be magical and find a way to make that happen. And, finally, I would personally like to thank you-all for being here, for taking the heat, for being scientifically honest and for finding a way for us to really solve this problem and really do it quickly. Thank you.				x			The Comprehensive Everglades Restoration Plan (CERP) was authorized in the Water Resources Development Act of 2000. CERP contains 68 projects which collectively are designed to reduce discharges to the northern estuaries and send more water south through the Greater Everglades to Everglades National Park and Florida Bay. The Section 203 EAA Storage Reservoir and Stormwater Treatment Area is one step in helping to reduce flows to the estuaries and improve flow south. This project is currently in the draft 2018 WRDA and if authorized, the Corps is committed to working collaboratively with our Non-Federal Sponsor, the South Florida Water Management District to implement.
Robert Ardigo	First of all, thank you for coming and hearing us all out. My name is Robert Ardigo. So how long has the C-44 STA and reservoir been going on? It's been going on for over three years now. And I know because I was the project manager for one of the construction companies building the STA. That's not going to work any more than this is going to work. What you need to do is you need to tell Disney to build your own wastewater and stormwater treatment area. Clean your own mess up and stop dumping it into the lake. And then you need to go to Big Sugar and cut them off from dumping in the -- back into the lake. You've got plenty of existing canals to send water south down to the Everglades to an STA that is already there built by God. It's called the Everglades. That's what it does. In the meantime, while you're doing that, you build a canal that's as wide as the Caloosahatchee River and our river and straight down into the Everglades. You put a weir down there at your discharge area at the elevation you want that lake to sit at, and it's -- it's a no-brainer. It takes no effort. I've dug canals that big. It's not hard. And then the -- then you're not spending one point -- what is it -- two billion dollars on something that's not going to work in ten years? Because I know exactly how long -- I know exactly how long it's going to take you to build an STA that size and get it up and running. It's going to take twice as long as you say it is because working with you people is -- is like pulling hair. That's all I gotta say.	x		x		x	x	Thank you for your comment. The C-44 Project is a component of the Comprehensive Everglades Restoration Plan (CERP) and was designed to capture and treat 65 percent of the average annual stormwater runoff in the C-44 basin and thereby reduce flows within the St. Lucie Estuary. This project, along with many of the other CERP projects include a stormwater treatment area to ensure that water is of sufficient quality to enter the Everglades ecosystem. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the U.S. Environmental Protection Agency (USEPA). The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Dr. Paul Gray	Hi. Thank you. I'm Paul Gray from Florida Audubon. Audubon very strongly supports this. As everybody knows, there's a big mess out there right now in the estuary and in the lake. And there's a lot of things we need to do to fix it. And this is one of them. This is a really big step of all the things we need to do because all the water we can put in that reservoir is water we don't have to dump down the estuary, water that doesn't have to be in the lake. So we really strongly support it. We realize a 180 days is like trying to sing the Minute Waltz in ten seconds. There's a lot of questions, but I think you guys will work them out as you go. So thank you.				x			Thank you for your comment and support of the project. The Section 203 EAA Storage Reservoir and Stormwater Treatment Area is one step in helping to reduce flows to the estuaries and improve flow south. This project is currently in the draft 2018 WRDA and if authorized, the Corps is committed to working collaboratively with our Non-Federal Sponsor, the South Florida Water Management District to implement.
Jay Kuhlman	Great. Thank you. I'm new to this community here. I moved here about a year ago from Colorado. So thank you. Yeah, thanks. But moved from Colorado and -- and made a big investment into, you know, buying a piece of property here on the Indian River Lagoon. And I can tell you that one of the things that I'm not hearing is that -- first off, this project, to me, is the definition of insanity. It's doing the same thing, as Einstein said, over and over again and expecting a different result. It's never going to happen. That's my personal feeling even though I've been here a year. But the bigger issue that I have looking at this community that really sort of breaks my heart is, one, the health care issues, the health issues that are impacting this community are severe, and nobody's talking about it. Major health issues across this community because of the releases from Lake Okeechobee. Secondly is the economic issues to this community; companies that are going out of business, assessed values on homes that aren't raising at the same rate of other communities because of the water issue. That is a major concern. And then, you know, in addition to that, it's me having a family, a young family. My two-year-old kid can't play in the water behind my house. But I pay property taxes that funds each and every one of you. Right? But what am I getting for my property taxes? I'm getting nothing for the money that I'm investing in this community. Jobs are impacted. Health is impacted. Not just the health of the estuary, but human health. Almost everyone in my community has respiratory issues right now. Everyone. I know people with staff infections. All kinds of things that are happening in this community. And we just go, you know what, for a few thousand people, we're going to do what we need to do for Big Sugar; and we're going to do all these other things. But we're not helping the millions of people on the West Coast and the East Coast because of these water problems. Thank you.	x	x	x			x	Thank you for your comment. The Jacksonville District manages Lake Okeechobee in accordance with the 2008 Lake Okeechobee Regulation Schedule (LORS). This document included input from stakeholders affected by the Corps' water management practices. Through LORS, the Corps balances the authorized purposes of Lake Okeechobee in making its water management decisions. These purposes include flood control, water supply, and environmental considerations. LORS considers the current lake level, the current inflows, and the forecast for the coming days, weeks, and months to provide a recommended decision path for consideration. The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Irene Gomes	Irene Gomes. I'm a motel owner along the Indian River Lagoon. And my family came here in 1958 because a love of the water here. And I've been greatly impacted with the discharges, not only with my family that they can enjoy the water -- that's what we came here for -- but also my business has suffered a great deal. I had, in 2016, several certified letters; and those people have not returned and may never return. They probably found another place to go. You're hurting -- this is hurting our way of life. This is hurting our health. You know, our children are growing up in an area that -- everything revolves around water; swimming, boating, skiing. And we can't enjoy any of it. We're paying a lot of money for property tax. It seems like, again, the same thing the gentleman said that these other interests are more important, that we're trying to get water to agriculture, water to sugar. What about us? What about the people here? The people need, you know, to be considered. Our health. We're paying the taxes. And it can't all be about them. We need help. We need help soon.	x	x	x			x	Thank you for your comment. The Jacksonville District manages Lake Okeechobee in accordance with the 2008 Lake Okeechobee Regulation Schedule (LORS). This document included input from stakeholders affected by the Corps' water management practices. Through LORS, the Corps balances the authorized purposes of Lake Okeechobee in making its water management decisions. These purposes include flood control, water supply, and environmental considerations. LORS considers the current lake level, the current inflows, and the forecast for the coming days, weeks, and months to provide a recommended decision path for consideration. The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).

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Jerry Jackson	I'm Jerry Jackson, a property owner in Martin County for over twenty-seven years. All I hear today is government. And I'm not even going to apologize. I want you guys to understand you don't have the right focus. What we have here is a 911 situation. Imagine, imagine, BP Oil spill out in the Gulf, whatever, eight years ago. And they said, oh, we need to do a feasibility study on how we're going to address this issue; and it's going to take a 180 days. That's expedited. Listen to me. This is serious. The disaster that's happening in our estuary right now is more severe than the BP Oil spill that happened out in the Gulf. There is zero evidence, zero evidence today that an oil spill was ever even happened in the Gulf of Mexico. Zero. Yet that company was fined billions --tens of billions of dollars to pay for revenues -- lost revenues for twenty years. It's the most absurd thing. Here's what you need to know. This is 911. Stop the discharges right now. Right now. No more. Raise -- raise the minimum threshold of Lake Okeechobee by three feet minimum. Raise it. Let's get that lake full, full to its capacity. Let's send the water south. If we have to dre -- I don't care if it's a -- it's a pipeline or a canal. Get the water flowing south. It's where it's supposed to go. Their wells are drying up in Weston and Miami because the dang water didn't get down there. Let's fix it. Put the water back where it belongs. Not only that, listen to this, this is not -- this is not fiction. Grist.org, search it yourself. Don't freak out. You may be drinking recycled --recycled toilet water. Municipal water supplies. They turned sewer water into drinking water. Don't tell me we can't fix this water problem. You stinkin' put the municipal water filtration systems north from Kissimmee. You do it on the Caloosahatchee. You do it on the St. Lucie. Filter the stinkin' water so that, when it hits our estuary, we don't have this disaster that's going on right now. And it's inexcusable. Nobody can claim ignorance. Nobody can claim we didn't know what was going to happen. President Trump, you are a problem solver. If you can hear me, listen, come to Stuart, Florida. Let's solve this problem. This is massive. And -- and Martin -- Martin County -- Martin County Tax Collector, I want a reduction in my taxes like every other tax --taxpayer in Martin County. Reduce our dang taxes. It's not right.	x		x		x		Thank you for your comment. The Jacksonville District manages Lake Okeechobee in accordance with the 2008 Lake Okeechobee Regulation Schedule (LORS). This document included input from stakeholders affected by the Corps' water management practices. Through LORS, the Corps balances the authorized purposes of Lake Okeechobee in making its water management decisions. These purposes include flood control, water supply, and environmental considerations. LORS considers the current lake level, the current inflows, and the forecast for the coming days, weeks, and months to provide a recommended decision path for consideration. The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Mike Conner	Thank you very much. I appreciate you being here, Lieutenant Colonel. And, Mr. Campbell, I appreciate you always calling me back when I call you to talk about the discharges. You've been great at that. You're a credit to the Corps. I appreciate that very much. I've been here twenty-two years. Made my living as a fishing guide at one time. I don't really do much of that anymore. I want to make a direct comment about the project. I went to Tallahassee during the scoping period, during Joe Negron's push through the legislature for his sixty-thousand-acre project. And that's what we envisioned was sixty thousand acres. We only need to move about one point two million acre-feet south to help both estuaries and also rehydrate Florida Bay. The project, as it stands, has got a couple faults. And I'm in favor of the three seventy thousand acre-feet much more. It's the most bang for our buck. But, frankly, the project has too small a footprint to do the cleansing of the water to meet the descent --Consent Decree to get to the Everglades National Park, that's an economic hit for me. But, again, I think that right now we have a major emergency, health emergency. And the DEP, government health or somebody has got to put a stop to it. I understand you can't stop the discharges. You must protect the dike. We've been at this a long time. I don't know who in the room remembers the St. Lucie River initiative. This is the first group before the Rivers Coalition that dealt with this in the '80s. And it's far too long, and I would appreciate some real expedited action. Thanks so much.				x		x	The Comprehensive Everglades Restoration Plan (CERP) was authorized in the Water Resources Development Act of 2000. CERP contains 68 projects which collectively are designed to reduce discharges to the northern estuaries and send more water south through the Greater Everglades to Everglades National Park and Florida Bay. The Section 203 EAA Storage Reservoir and Stormwater Treatment Area is one step in helping to reduce flows to the estuaries and improve flow south. Thank you for your comment. The Jacksonville District manages Lake Okeechobee in accordance with the 2008 Lake Okeechobee Regulation Schedule (LORS). This document included input from stakeholders affected by the Corps' water management practices. Through LORS, the Corps balances the authorized purposes of Lake Okeechobee in making its water management decisions. These purposes include flood control, water supply, and environmental considerations. LORS considers the current lake level, the current inflows, and the forecast for the coming days, weeks, and months to provide a recommended decision path for consideration. The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Emily Mauri	Hi. My name is Emily Mauri. My husband and I moved here in 2016 to start a fly fishing business. So we pretty much agree with everything that everyone is saying. But I -- my only somewhat question or comment is in relation to all of the -- the tour that you're doing is I was very surprised that you hadn't done anything closer to the Keys. I feel like that's a really important part of this, and I would have liked to have seen -- I'm sure there's a lot of people down there that also have water-dependent businesses for their --you know, for their livelihood and their families. And I would think it would be really important to get input from them. So that was -- that is my comment.		x				x	Thank you for your comment. The Corps conducts National Environmental Policy Act meetings within the project area. Although we cannot visit every county or municipality due to costs, we aim to hold meetings in areas in which the project may have the greatest impact. In this circumstance, the Section 203 EAA Storage Reservoir and Stormwater Treatment Area will provide the greatest benefit to stakeholders within the northern Everglades and estuaries.
Paul Flood	Good evening, and thank you for having this meeting. I appreciate it. I've got a present here for you. I'd like you to put this on your desk, if you would. light. I've got a present here for you. I'd like, if you would, to take it and put it on your desk until this is revolved. This is tap water. This is some water I just took from the basin. I live on the island about two and a half, three miles north of Sewall's Point but over on the other side. I just took this the other day, two days ago. I guess the point -- everything I'm hearing here -- there's two things. We need to stop a lot of the flow and -- that shouldn't be going into Lake Okeechobee to begin with and hold people up there responsible. And then I -- I totally agree with we need to do more on getting more of this water to the south. Your presentation was nice. I've got two engineering degrees. One is in civil engineering. And, very honestly, I would guess most of your presentation went like this over most of the people's heads here. You know, it's just -- it's way more technical. What we want is the water not to be released into the two rivers, period. It isn't that complicated. A long time ago, 1970, I was put in charge of containing a spill from Exxon in New Jersey, two hundred and eighteen thousand barrels of oil. Not gallons, barrels. We didn't have time to study it. We didn't get any kind of approvals. We got in our boats and went down and started working. And I think, you know, listening to the bureaucracy here, it's mind-boggling. It is literally mind-boggling. The last -- the last -- the last point I would make -- the last point I would make very briefly, people, go out on the Internet, see which of your politicians is getting money from the sugar companies. Okay? And then -- and then vote them out of office no matter if they're democrats or republicans. Thank you.	x				x		The Comprehensive Everglades Restoration Plan (CERP) was authorized in the Water Resources Development Act of 2000. CERP contains 68 projects which collectively are designed to reduce discharges to the northern estuaries and send more water south through the Greater Everglades to Everglades National Park and Florida Bay. The Section 203 EAA Storage Reservoir and Stormwater Treatment Area is one step in helping to reduce flows to the estuaries and improve flow south.
Ben Lovelace	Yeah. So I'm an engineer too. Don't hold that against me. I know these projects take time. They take money. Then there's, like, a trial and error period, which we've been in for a while. Before you do any kind of design, you usually think, well, what's the design criteria? I thought to myself, well, if I was the Corps of Engineers, what would it be? My number one criteria was public safety. Don't hurt anybody. That should be number one. The number two criteria should be something that doesn't conflict with number one. And, I thought, well, number two would be don't screw up the environment. Don't hurt it any more than necessary as long as you don't impact number one. Number three would be help the economic interests that you're associated, things you're doing; the dams, the canals, whatever. I thought, that should be your mission statement. And then I thought: I wonder what their mission statement is? I'll just go to your website and check it out. That's when I said, uh-oh. I'll read it to you. The U.S. Army Corps of Engineers' mission is to provide vital public engineering services in peace and war to strengthen our nation's security. I didn't think of that one. Energize the economy and reduce risk from disasters. Nothing about the environment. So I would like to ask you to put something in here, maybe number two -- maybe after -- you know, put energize the economy at the end. But put to protect the environment in there somewhere. We deserve that. Thank you.						x	The purpose of this project is to help restore the Everglades, while also reducing flows to the estuaries. One of the Army Corps missions, "Ecosystem Restoration is one of the primary missions of the Corps of Engineers. The purpose of Corps ecosystem restoration activities is to restore significant ecosystem function, structure, and dynamic processes that have been degraded. ... The Corps of Engineers also implements projects under the Estuary Restoration Act."

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Brian McGann	Hi. My name is Brian McGann. I believe I'm next. I live in the estuary. I'm not very well spoken. But the one comment I would like to make is, along with the environmental impact, research this to have the district hospitals and doctors monitor to see the -- the effects that the discharges are having on our skin and our respiratory.	x					x	Thank you for your comment. The Jacksonville District manages Lake Okeechobee in accordance with the 2008 Lake Okeechobee Regulation Schedule (LORS). This document included input from stakeholders affected by the Corps' water management practices. Through LORS, the Corps balances the authorized purposes of Lake Okeechobee in making its water management decisions. These purposes include flood control, water supply, and environmental considerations. LORS considers the current lake level, the current inflows, and the forecast for the coming days, weeks, and months to provide a recommended decision path for consideration. The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Kevin Flis	I know we're here to discuss the environmental impacts of the reservoir. But today I thought it would be interesting to look back thirty-two years ago before I was born to an article by Jon Nordheimer published by the New York Times August 23, 1986. Lake Okeechobee, giant linchpin of the water resource network of South Florida and the Everglades is dying. And the state is mobilize -- mobilizing to rescue the lake and prevent what some experts fear to be an environmental disaster. State officials were already planning a program to protect the lake when an eruption of blue-green algae covered more than a hundred square miles of its surface. Such huge algae blooms are considered unmistakable signs of declining water quality and a state leading to a biological death of the lake. The loss of Lake Okeechobee would be an environmental calamity of the first magnitude, said Pat Bidol, an official in the water district that includes the lake. The most direct economic impact of a dead lake would be on the multimillion-dollar sports and recreation industry. An official of the South Florida Water Management District described the condition of the lake as grave and said drastic measures were needed to save it. Victoria Tschinkel, Secretary of the Florida DEP, was equally blunt. We're absolutely up against the biological limits of the lake. The lake is screaming it can no longer be all things to all people. For decades, the South Florida Water Management District's Board of Governors was principally concerned with flood control and was perceived to be under the influence of agricultural interests it served, especially sugar cane growers south of the lake. That was thirty -- that was thirty-two years ago. Fast forward now thirty-two years. The issues are ten-fold. The consequences affect millions of people and thousands of species of wildlife. As of two days ago, cyanobacteria covered eighty percent or 585 square miles of the lake compared to a 100-square-mile disaster in 1986. The fishing industry is up to a multibillion dollar status. And the South Florida Water Management and the chemical polluters just keep raising the toxicity levels, kicking the proverbial chemical can down the road. You have lost the Mona Lisa of Florida. You have destroyed the most dynamic estuary in the country. You have taken away jobs and opportunity, growth and prosperity, life and vitality. How much pollution should I take before I move my family away in search of greener grass and bluer water.	x		x			x	Thank you for your comment. The Jacksonville District manages Lake Okeechobee in accordance with the 2008 Lake Okeechobee Regulation Schedule (LORS). This document included input from stakeholders affected by the Corps' water management practices. Through LORS, the Corps balances the authorized purposes of Lake Okeechobee in making its water management decisions. These purposes include flood control, water supply, and environmental considerations. LORS considers the current lake level, the current inflows, and the forecast for the coming days, weeks, and months to provide a recommended decision path for consideration. The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Mike Glynn	Hi. My name is Mike Glynn. I live here in Martin County. Lived in Dade County. Lived in two counties all my life. I don't want to live anywhere else. First off, I'm going to -- I'm going to say something different. Thank you guys for what you do every day. I do believe we don't have an Army Corps issue. I do believe we have a political issue. There's elected officials in the room right now. There's future want-to-be-elected officials in the room right now. And I do believe in my heart you guys all know what to do. There's people I'm looking at right here know what to do. The science is there. The answers are there. Someone's missing in this room. His name or her name is political will. Until that's going to happen, I don't believe we're going to be fixing too much. I am in support of your project. It needs to be bigger. I do believe, if you're going to do it, do it right one time instead of, like that young man said before me, doing it again in thirty years. I got all the faith in -- in you guys on executing your plan. No problems. We're missing the political will to get it done quick. One other thing if I've still got time. I'm amongst a bunch of people. I hear all the time democrats this, republicans this. Until we all get off that, political will not be in the room because the politicians will win. They will win if we're not supported and get out and vote for the right person who's going to make a difference. And it is not a republican. It is not a democrat. It's a person. Thank you.		x	x	x			
Douglas Ashley	I'm Douglas Ashley. I have a family history that goes back to 1960 when I was about this high when I saw blue water. I grew up in Upstate New York, the Adirondacks. And this is a corollary example. GE polluted the Hudson. What did the government do? They went after GE. I say this very carefully. Your south end has sugar. The north end has farms and agriculture and cattle. Cattle has a lot of power. Now, what I'm going to suggest, the other part -- and I respect your presentation. Everybody should go on Rivers Coalition. I'll do a five-second commercial. They keep the tapes of the meetings on --and you can review it. She did an excellent presentation. The man before me, I compliment you, as well. You're doing your job. That's what you're supposed to do, and you do it excellently. The problem I personally have -- and I voiced this earlier -- is the time schedule. I got very active ten years ago. I've heard it every time, every year: It's five years, five years, five years, five years. I'm sure you want to move dirt. That's your expertise. You can do it very well. Wherever the money, the appropriations. I got appalled when the Everglades Plan came through President Bush and everybody raved about it, but nobody ever heard about the appropriations. So, if you could -- whatever you can do -- I know you're an expert in what you do, and I appreciate that. But whatever you can do in kind of speeding it up. I was wonderful to hear eighteen months. Usually I used to hear eighteen years. So that's a big accomplishment. But whatever you can provide us and do something right away. The man who said 911, that -- that's a simple way to put it. Thank you very much.			x	x			
Nancy Weldon	My name is Nancy Weldon. My husband grew up in this area. For forty years we worked out west and saved all our money to come here and retire. We've been here twenty-six days. We're afraid to go in the ocean. He wants to be a fisherman. He can't fish. I can't go in the ocean. When is it going to be safe? A 180 days? We sold our house. We sold everything to come out here. We've been here twenty-six days. If the U.S. Army Corps can't fix it, hire the private sector. Get it done now. This is an epic disaster that requires immediate action. I don't know what Floridians are doing. These are the only people I've met that care. I've talked to people in stores. They don't care. I don't go in the ocean. I don't care. Well, you'll care if you lose your job. You'll care when the ocean is dead and you can never go again. What are we going to save? A lake or an ocean? I don't know what Lake Ojiwankanobi is. I've never been there. Maybe we should fill it in with dirt or cement. I don't care about that lake. I care about the ocean. I live across the street from the ocean, and I can't walk over there and collect my shells and enjoy my retirement. What am I going to do? What am I going to do? Can anybody tell me?	x	x					The Comprehensive Everglades Restoration Plan (CERP) was authorized in the Water Resources Development Act of 2000. CERP contains 68 projects which collectively are designed to reduce discharges to the northern estuaries and send more water south through the Greater Everglades to Everglades National Park and Florida Bay. The Section 203 EAA Storage Reservoir and Stormwater Treatment Area is one step in helping to reduce flows to the estuaries and improve flow south.
Arthur Derchane	My name is Arthur Derchane. All I have to say is I have a lack -- a lack of distrust in the sugar farmers, Water Management. When you have Irene Quincey, a lobbyist at US Sugar, being able to edit the annual report of the Management District, that tells you where the trust is. And I really hope that they're not left managing the -- the new reservoir. Thank you.						x	The South Florida Water Management District and Corps would manage the reservoir operations.

Commentor	Comment	Polluting estuaries, water quality concerns	Solution too small	Solution takes too long/Immediate action needed to clean water and/or stop releases	Support	Stop sending water to estuaries, send south to Everglades	Other (please see Additional Response Column)	Response
Danna Pace	Thanks for the opportunity to give some comments tonight I'll be sending in. I'm director, by the way, of a little organization called the South Florida Wildlands Association. We'll be sending in some extensive comments by e-mail. We've been following this project for years, and we're not happy with it for a lot of reasons. And I can't get into all of that in two minutes. But our engineering colleagues said the devil is in the details in a project like this. This is really complicated. The most important thing that I can share right now is people need to know that there's already fifty-two thousand acres of STAs south of Lake Okeechobee, fifty-two thousand. They're adding six thousand five hundred in this project. That's twelve point five percent. And no water goes south from Lake Okeechobee right now, nothing. I was just at Phipps Park. I was watching this green streams of algae running through the locks right now. It's pretty nasty. And I probably shouldn't have been there because there was a lot of mess breathing it in. But, at any rate, this STA is not going to cut it. There's no way it's going to cut it. You're building a C-43 reservoir west of the lake. There's no STA connected to that. Scientists are saying you're probably not even going to be able to release the water. So how are you going to -- and there's another thing. You're talking about moving this water from the reservoir directly into the Miami and New River Canals. The way you constructed that system, the Central and Southern Flood Control Project, those two canals keep people dry in Miami and Broward. You can't just fill them up during the wet season. How are you going to drain the streets there? You've got a completely -- a much bigger problem. You're not being honest with people about how much water is coming into the lake, how much an STA can clean, how fast this water could go out. And you're selling something, you're promising something that you're not going to be able to deliver. You're going to have some very unhappy people here in the future. Do this project right. Thank you.		x				x	The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters). While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Glenn Kellis	Hi. Hi, I'm Glenn Kellis. I came here to fish. That's the main reason that we moved back here to Florida. I echo the sentiments of most of the people that spoke here. I'm not going to get too excited and yell at you or anything. But it's pretty obvious that the whole project is not big enough. It started out as a pretty good-sized project, and then it got cut down by the sugar industry. Cut down, cut down, cut down. And there's -- there's not enough of it left that's not going to make enough difference. I think that's pretty obvious. I know, in the state -- in SB-10, the sugar industry got in there and said, okay, you can't use eminent domain. So that's with the state. How about the federal government? Can they use eminent domain to take sugar land and make this thing a workable project? That's my question. I know you're not taking questions. But that's the question for everybody. Thank you.		x					
Chris Ladue	My name is Chris Ladue. I live in Stuart, Florida. And I just want to say Karl Wickstrom passed away this week. It was a front page obituary in the Stuart News. He was a tireless advocate for our river, for conservation and for clean water. And, you know, the fight goes on. Thank you, Karl. Thank you to your family. God bless. It seems that, in twenty years of living here, the summers of droughts have been my only memorable times on the water. And it's taken too long to implement positive changes. We're cleaning water from the Everglades. Yet we're blasting our community repeatedly with dirty water. Where is our state statute for water quality -- or state standards, rather, for water quality? I'm tired of hearing about fertilizer and septic tanks. When the dumping begins, our water access ends. So, as a twenty-year veteran and raising a family in this community, we are locked out of our water, access to our spoil islands and times we should be enjoying with our families. And there's got to be a better way. I was here early. I was here an hour before it started. Gina -- right, Gina -- was kind enough to show me the boards in the back. And, when I first saw the project -- it might be oversimplification -- but I thought it's like going home, filling up my bathtub with water and trying to drain it with a thimble. It's not enough. It's not going to work. Thank you.		x					
Drew Martin	I'm Drew Martin. I'm here on behalf of the Loxahatchee Group of the Sierra Club. And, while we're happy that you're going to do something, we agree with many of the speakers. It's not enough. The reservoir is not large enough, and the STAs are not large enough. And one of the problems which was brought up by a previous speaker is that there are unwilling sellers in the EAA. And that means that there is property there, but they don't want to sell it. Now, the state had a contract to purchase a hundred and eighty thousand acres. And they terminated -- the South Florida Water Management District terminated that contract and decided not to move forward with it. One thing you have to understand is why is that agricultural land valuable? Because the Water Savings Clause makes it so that you cannot flood that land when it's wet, and you have to provide water when it's dry. And they have the top priority. And one of the reasons that happens is because DEP has not fulfilled its job in protecting the water quality of the Indian River Lagoon and the Caloosahatchee River. So we believe that, while this project will have some beneficial effects, that we need to make it larger. We need a larger footprint for the reservoir. We need a larger footprint for the STAs. We need more water moving south that's clean. And we have to protect the water quality in Lake Okeechobee because the dirtier the water is in Lake Okeechobee, the dirtier the water is that comes through those rivers into your area. So you don't want to ruin the water quality in Lake Okeechobee. One of the problems is the littoral zones in Lake Okeechobee were cut off, in part, by the dike. And what happened is that Lake Okeechobee used to be able to move much wider than it is today. And, when it did that, that cleaned the lake. The other problem which has been brought up is Orlando and the continued development and destruction of wetlands up there. They were allowed basically to not do their job. The Kissimmee River Restoration has improved that. But there's still too much nutrients coming into the lake from the previous landowners up there. But, overall, we need more, more, more, more, more. Thank you.		x					

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Joe Angiulli	Good evening, everybody. My name is Joe Angiulli. I'm just a passionate young guy here about the river. I'm not really half as knowledgeable as you-all in this room about the river. But I am a student of history and I'm a student of science, and that's what I'd like to speak on here today. If you look at why does the dike exist in the first place? It's because of the hurricane. No, not Irma. I mean, the one in the 1920s. You know? The one that killed everybody. It's -- I think to this day -- I may be wrong on that -- but the most death-causing natural disaster in this state's history if not the country's history. Your job is still -- because of that hurricane, your job is to control water flow. At the moment, your job isn't to control the state of our environment. But the reality of the situation is, because of how you regulate the water flow, it affects our environment to such a degree that the Indian River Lagoon -- which, at one point in time, was the most biologically diverse lagoon ecosystem in not just the country, the entire word. There were over five thousand species in that -- in that system. Now there are estimated to be less than two thousand. And that number is quickly dropping every day. You know, me as just a guy, if I were to get in a boat right now, grab my fishing pole and let's just say, for argument's sake, hook a sea turtle, put it in my boat, I'd be in jail before the sun came up. But, when you guys push a button to open the dike, you can kill every sea turtle from here to Jupiter and north to Vero. And hold on. I'm not done yet. Relax. But, as far as I know, the -- you know, the -- the -- the law says that that's okay because, you know, your job is to regulate water flow, not the environment. And, you know, at this point, as far as I know, last year eleven people died from coming into contact with this water. I mean, how many more people are going to have to die before you realize this is something that, you know, you guys are going to have to take -- not responsibility for, God bless your souls. But I would say at least do preventative measures to ensure something like this doesn't happen again. You know? And that's all I'd like to say. Thank you for letting me speak. I commend you guys for what you're doing. Obviously, it's not really enough to really fix the whole problem; but it's a step. And I appreciate you guys taking comments and listening. And I hope that, you know, we can all in this room work together to make this problem better and not worse. Good luck.		x					The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters). While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Jacqui Thurlow-Lipisch	Thank you for allowing me to speak. I'm Jacqui Thurlow-Lipisch. And I'm going to try to stay on point here. And the point is about your project. And I think we all need to remember that the only reason all of us are here tonight is because of Senator Joe Negron. If he had not pushed for this SB 10, we wouldn't be here tonight. And so, as bad as everything is, it is a miracle almost that we are standing before you tonight. And I am asking the Army Corps to please continue this miracle because it's all we have. It is imperfect. We would like it to be more. But this is all we've got. And we have heard rumblings that perhaps the Army Corps in Washington DC does not want to pay for part of the project, or there are difficulties with choices. I am begging you to please fulfill this no matter what it is so we can begin to send the water south. And I also want to thank the Army Corps today for the press release that you announced at our Rivers Coalition meeting stating that the Army Corps will not be releasing for nine days, and we appreciate that you understand we're in big trouble.		x		x			
Mark Perry	Mark Perry. You know, knowing this problem for many years and over decades, we who have worked on it and tried to work with it, we who live here in this community have known about this issue for many years. It wasn't until 2004 that I began to see the actual discharge from the lake carry with it the blue-green algae that's in our estuary right now. This morning as I took those samples and showed you at the Rivers Coalition, those are live real samples of blue-green algae that's toxic. And it's a health hazard. It's a health issue that can really affect this community. And it's got to stop, and it has to stop. And we have to get this situation right. As Jacqui said, I mean, we were fortunate to get this moving quicker than the Corps had it on -- on your schedule to move it, not to start planning for another couple years. But, because of the Senate President Negron and others who moved this forward through the senate, state legislature, we were able to get this project moved up on the schedule. And now before us is the detail of the project. Unfortunately, as many have said, it's not big enough. And, when we started working with Senator Negron, we looked at sixty thousand acres that's needed in the project because that's what was in the original CERP plan was sixty thousand acres, six feet deep. That's three hundred and sixty thousand acre-feet of storage. What we ended up with in 1999 was behind the Talisman property, the A-1 and A-2 components you see there. It's thirty-one thousand acres. And that was going to be the EAA storage reservoir at twelve feet deep for another three hundred and sixty thousand acre-feet. What we have now is about two hundred and forty thousand acre-feet being proposed, which is a lot less. And, even though it's proposed to stop about fifty-five percent of the volume discharges from Lake Okeechobee, that's not enough. And it needs to go further. The problem was that, as that process started, the requirement and the pressure came on from agriculture to use only state lands for that project, not to purchase anymore land. But what happened this May, starting May 15th, is evident of what happens every year and why we need to get onto this is that the EAA --the EAA runoff, the basin runoff of that seven hundred thousand acres south of the lake has been utilizing the STAs, our STAs that we purchased to move over two to six billion gallons a day into the Water Conservation Areas which are now filled up to a foot and a half above schedule. And there's no capacity to put water from the lake south into there. I say that this project, the EAA storage project, should not use any -- anything from the EAA basin runoff; but everything in it should come from the lake. And that conveyance capacity that you have in here, an additional twelve hundred cfs from the Miami and North New River Canal into the reservoir needs to be increased to a maximum to match our capacity we have east and west of these estuaries. Historically, the water never went to these estuaries. We've got to get it all going south. And it has to be on -- we use state lands for state water. We need to tell the EAA to use their own land to store and treat that water before it goes south to the Everglades and treat it to the water requirements that the Everglades needs and not you and I, as taxpayers, paying for that and paying more for this reservoir to be utilized. If any part of this reservoir is used for that purpose, for storing their water and treating their water, I'm going to be totally livid. This project needs to go forward. It needs to be bigger. It needs to have more capacity and conveyance storage treatment and move that water south. And then we need to work to get the other forty-five percent done and other projects around and stop it altogether. Thank you.		x		x			The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. 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Thomas Rebik	Hi, my name's Tom Rebik. And I'm one of these retired systems analyst people that likes to play with numbers. So I hope I don't bore everybody to death on this. But an acre-foot of water is one square acre, one foot deep, contains about three hundred and twenty-five thousand gallons. The discharge through the canals is one point two billion gallons a day. That's thirty-seven hundred acre-feet. Lake Okeechobee is four hundred and forty-eight thousand acres. The reservoir that we have here is, like, ten thousand feet -- ten thousand acres and twenty-three feet deep, contains about two hundred and forty-two thousand acre-feet. So, if we have Lake Okeechobee and we fill up the reservoir, we will reduce Lake Okeechobee by six inches. We get that much rain in one day. So now we have to drain the reservoir for more room. If we drain the reservoir at one point two billion gallons or the thirty-seven hundred acre-feet per day, it takes sixty-five days to empty the reservoir. A lot of people have said it's inadequate. You can see that it's totally inadequate. It doesn't take a genius to look at the numbers and say it's not going to treat anywhere near what we have or what we need it to treat. Now, the Everglades is one point five million acres of marshland. And we're taking the reservoir and putting it into sixty-five hundred acres to clean it up. We've got one -- sixty-five hundred acres of marsh. We have one point five million acres of marsh that's totally capable of cleaning it up. The solution, as we all have said, is we need a couple of big canals from the lake going south to get past the agricultural -- if you take a look at the -- at a satellite photo, it's very easy to see. You get past the agricultural acres. You put a canal in east and west from one side of the state to the other. Every mile or so you have discharge points into the -- into the Everglades. You get the water out of the lake. You get it into the Glades. The Glades clean it up. It percolates down through there a hundred miles or two into Florida Bay. Everybody lives happily ever after. Okay. I have one question then. What is it you guys need to make that happen? Do you need different regulations? Do you need different laws? Do you need eminent domain? If the Corps of Engineers could say, look, here's what we need to get this to happen, we could all get together with the representatives and put pressure where it needs to be and make it happen. We don't know what it takes. You need to tell us.		x			x		The Section 203 EAA Storage Reservoir and Stormwater Treatment Area is one step in helping to reduce flows to the estuaries and improve flow south. This project is currently in the draft 2018 WRDA and if authorized, the Corps is committed to working collaboratively with our Non-Federal Sponsor, the South Florida Water Management District to implement.

Commentor	Comment	Polluting estuaries, water quality concerns	Solution too small	Solution takes too long/Immediate action needed to clean water and/or stop releases	Support	Stop sending water to estuaries, send south to Everglades	Other (please see Additional Response Column)	Response
Sharon Seagren	Hi. Hello. My name is Sharon Seagren. And I live on the Jupiter Inlet. And I want to thank you very much for everything you're doing. And I'd also like to volunteer my help. I was a Six Sigma engineer and -- for my career. And I studied at Harvard and MIT. And I've been placed on some of the hardest projects. And I've done some work in this space for some years. And, in the private sector, there are a number of different solutions and technologies and proven science that I think would be very helpful to you. They're also profitable, so they would be -- be self funding. So I'll leave my card with you. And I'd be more than happy to share, you know, my experience. You know, I've been in engineering, I hate to say, for over thirty years. So I'm -- and I have a lot of network and contacts that would like to be helpful here. So I'll leave my card with you.						x	Thank you for your comment and contact information.
Rubin Anderson	Hello. My name is Rubin Anderson. And there's not too much more that I can say than what has already been said. I live in West Palm Beach, Florida. I moved here about thirty-eight years ago from Kissimmee, Florida. So I'm so familiar with the Kissimmee River and how it used to work. When I was in Kissimmee, I worked with this company that was hired by the U.S. government, the Army Corps of Engineers; and we did a lot of work. And so I know what you're doing is very important. Unfortunately, I wasn't in the room to hear about the project. But I'm pretty sure it will do good. But my -- my question is this. The last meeting I was at, I talked to South Florida Water Management; and I talked to the Army Corps of Engineers. And everybody was saying, I've been working here for ten years, I've been working here for forty years, I've been working here for fifty years. And so I added all those years up together, and we came up with about five hundred years. So, since we have five hundred years of experience, I just don't understand why we can't get water from one place to another place. I can't. I was there when President Reagan signed a bill to make a weapon to destroy everything but the vegetation. So I know how much money we have, and I know what we can do if we can just learn to work together. I heard someone say it's not a republican problem. It's not a democrat problem. It's a problem that we need to realize. Reagan said, the purpose of the government is to protect the people. And, if we don't protect the people, then we don't have anything. My grandson got sick -- and I'm not claiming that it was the water. But he had cancer in an area where kids were getting sick. And so all I'm saying is that, if we have over five hundred years of experience, we need to start learning how to work together so that we can protect our land. Water is all that we have here. We fish, we play, we swim, we sail. This is our golden egg I heard someone say. And so I'm -- I have my faith in you because I've been there working with the Army Corps of Engineers. I have my faith in you. Let's get it done. Let's work together so that we can protect all of our people. Thank you.				x		x	Thank you for your support, the project goals include moving water away from the estuaries to enhance Everglades restoration.
Anna Bergalis	Yes. I live here in Stuart, and I always -- I call this now Stuart's dirty secret because nobody knows what happens around here until they move here and buy here. I will admire you for standing up here. You're a lot stronger and you display more strength than our representatives, Rubio and Nelson, who both took sugar subsidies. A legislature in Pennsylvania wanted to cut them back or just cut them off at all -- cut them off completely. And Nelson and Rubio, both of them, continue the subsidies so Raysa Fanjul can still buy her eight-thousand-dollar dresses courtesy of Washington and us. Also, too, back pumping. I question back pumping. I said, well, you know, what about back pumping? And they said, well now, the agriculture now is cleaning up their water and is sending it into the Everglades. So, I said, well, okay, that sounds like an improvement if that's correct. But, they said, Clewiston and the Belle Glades, they continue -- when we -- you get a heavy rainfall, they pump it back into Okeechobee. So I'm, like, great. So I'm getting all of Clewiston's and -- what is it now -- Belle Glades. God only knows what I'm getting because nobody's testing. Nobody's testing. So I don't know what I'm breathing. I just know that the river turns black. It turns foamy. Now, I don't -- I have a respiratory problem, but it's not enough to go to a doctor. It's just a throat irritation I have. But it's not -- but I do get it. Also, too, my neighbor sold her house. She was I divorcee with three kids. She lost hundreds of thousands of dollars selling her home because the river was black and foamy. So amen to you. Keep it up. Keep -- your ears must be bent with all this, but it's something that you need to hear. Okay?		x				x	The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters). While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Laurie Prim	Hi. My name is Laurie Prim. I live in Rocky Point. I live on the Manatee Pocket, one house in. And I live off cough drops all summer. And I have two children ages eleven and six that I'm really worried about. So I feel every bit of what everybody in this room feels. That said, I attended in Washington DC this week Brian Mast's Lagoon Action Day. And it may as well have been called the bash the Army Corps of Engineers Day. I will tell everybody in this room and at home that the word sugar was not uttered once all day. It was the same tired song all day long from Marco Rubio, Brian Mast, Congressman Garret Graves and Bill Shuster that it's all the Army Corps of Engineers. Never mind their own atrocious environmental voting records. Never mind their big donors who pollute the water to begin with. Never mind their support of a president who is dismantling the EPA along with the secretary of the EPA himself. Never mind their primary goal, along with tax cuts which equals defunding, is deregulating or unprotecting everything to promote fossil fuel profit. We cannot just keep cleaning dirty water. We cannot just keep banging on our chest saying stop the discharges that are not going to stop. Somebody read the mission. It's to prevent disaster. A flood is an environmental disaster. They're not going to stop the discharges for us and threaten other people. That's a choice of lives. Neither one is a good choice. They're not going to stop. Stop just saying that. I want funding and regulations for real change. It's already too late for me. I'm hoping it's not too late for my kids. And I definitely don't want it to be to late for future generations. Our politicians are using this algae bloom to grandstand their environmental agendas, which is to destroy it for profit. Don't listen to me. Don't listen to them. Watch what they do. Check their votes. It's one click. Go to the League of Conservation Voters. Marco Rubio, zero percent. Brian Mast, twenty-three percent. Look at their votes. Their answer is to dismantle and discredit the Army Corps so they can privatize everything. And what happens then? Who do you think is going to get those contracts? Who do you think is going to make the money? That's where the problem lies. You want it not to be a party thing? Find me a republican who's going to fight for that and not corporate profit, and I'll be behind that republican. Right now, there is none. So right now there is a party issue. And, if you want it to not be, find a candidate who will make it not be. But, right now, the entire republican party's goal is to deregulate everything and promote profit by using fossil fuels. Check their votes. And stop just blaming one company -- one entity who is reg -- who they take their orders from the President of the United States and the Department of Defense. So, if you want them to change, you change those leaders. You change Trump, and you change James Mattis. That's who you change. Get out and vote for a change. Thank you. And thank you for being here in our community. I appreciate it.						x	The Corps of Engineers is sensitive to the environmental concerns and challenges presented by discharges from Lake Okeechobee. We take every opportunity to minimize the impacts of potential discharges. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. 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Bruce Osborn	Good evening. Thank you very much for stepping into the lion's den. You'll have to forgive me. I have a bit of a -- a bit of a cold that I am getting over. First of all, Lieutenant Colonel Reynolds, I want to thank you. And I really want to express my disappointment that the rest of you folks who were not at this morning's Rivers Coalition meeting didn't get to hear a singular and exceptional speaker that Martin County has experienced. Lieutenant Colonel Reynolds presented credibly, compassionately, with great tact, understanding and great information a very difficult message that she had to convey. And so we've heard tonight -- we heard all the vitriol being thrown toward the Army Corps of Engineers. If the old Marshall McLuhan message -- and I'm a lifelong marketer. If the old Marshall McLuhan message is the medium is the message, your message was so compelling because you were the medium. Thank you. I wish tonight I could say the same for the rest of the presenters tonight. We're not civil servants. If you look around, we're parents, grandparents, property owners, people who are involved in different aspects of the water. What we're not is a room full of civil servants sitting in our corporate boardrooms or our boardrooms and our cubicles. And what doesn't pass -- if I was in marketing and the director of this team, I would say go back and redo your presentation. A slide with fine font, too many bullet points isn't information. It's gray. It's a color. It doesn't convey information. Steve Jobs launched world-changing technologies, the iPod and the iPhone, with a single PowerPoint slide and got his point across. So a message to you folks, if you have a message to say, respect this audience tonight. This is a marketer's dream. You've got this many passionate people to come out without food and without wine. I could never do that. I could never do that. So you already have an audience that wants to hear what you have to say. Make sure you know what you want to say. Present it clearly and make sure your audience understood it and took that away instead of scratching their head and talking to their neighbor and said, can you read that slide? The young person next to me said, I'm sorry, I can't read it either. Lieutenant Colonel Reynolds, thank you for a remarkable day. Folks, back to class. Thanks.						x	Thank you for your comment.
George Jones	Actually, I didn't sign up to speak. I just signed up to get my name on the list to get your mailing stuff. But I will speak since I'm here. I've been involved with Everglades restoration going back to the early '70's and '80s when people were just starting to begin to talk about it with Bob Graham and several folks as they came up through. I was in South Dade when it flooded and the first hundred thousand acres was purchased. I'd like to see some projects finished. I don't think the project that was discussed today is optimal. I think it's been scaled back, and I don't think it can do the job that it was intended to do. I'd like to see that continue to be pushed and the envelope pushed to enlarge that project as we move forward. I know the term adaptive management has lots of wiggle room and meanings and politically. But what we need to do in this room here is not point fingers at the agency that's standing in front of us here, but what we need to point fingers at are our elected representatives and make sure they get the job done because that's where the problem is. I can tell you that I spent thirty-four years in DEP with the State Parks Department. So we didn't deal with the regulatory end of things. But, when they merged the regulatory part and the land management part, regulation kind of took over; and there wasn't a permit they didn't like and there wasn't a violation notice that they didn't turn their nose up on and not pursue in the last twenty-some-odd years. So this is an elected issues problem. You need to put people in charge of the DEP and the other agencies in the State of Florida. It's not the Army Corps' job to clean up the water in the State of Florida. The Army Corps' job is to build projects and to move that water around in an efficient and correct way. So we need to start looking inward at our own state when we start talking about dirty water here. And I've had about enough of it. I managed John Pennekamp State Park and watched the coral reefs die. And I started diving there in the late '50s. It's happening all the way up the coast. And it's happening all over Florida. And, really, Florida has good water law. It's just not being enforced.		x				x	Thank you for your comment.
Alex Gillen	Hi, Lieutenant Colonel. Alex Gillen, Bullsugar Alliance. Thank you for coming, and thank you for being here tonight. First, on the technical side of things, there's a slide that says that SB 10 called for a toll reservoir. That's incorrect. It needs to be updated for the record. Second, we agree with the Corps' observation of the South Florida Water Management District's feasibility study. We appreciate the Corps' participation, and we would like the Corps to continue working with and -- and looking to address the concerns that were noted in -- in your critique a few weeks ago. Third, I think this room demonstrates that this project must be authorized. This -- this project -- this is one of the original CERP projects. It's been on the books since CERP was around. It is the keystone project to Everglades restoration. It is necessary to, not only reduce discharges, but to send water south. There could not be a more important project, and that's why we've been trying to build it for the last eighteen years. So it must go forward. It must -- must continue. I think, as far as this room proves, this is not a political game. This is not something that's not serious. The people in this room have demonstrated that it's their lives. It's their livelihoods. It's the health of their children. We can't continue to play games with this project through Everglades restoration. And we know that that's on the Congress. As you stated today, the priorities of the Everglades system are the product of the 1948 Central Florida -- Central -- CNSF, Central Florida Southern Project -- I think I -- Central and South Florida project. That project is really important. That's something that you-all need to know about because that 1948 authorization is what governs how we manage the lake today. The problem we have in the lake is our priorities. And until we address the priorities, we're not going to be able to solve this. And that is incumbent upon Congress. That is not up to the Corps. The Corps is taking orders from the Congress, and the Congress has to address it. So thank you very much.				x			
Mary Radabaugh	My name is Mary Radabaugh. And I do get a little emotional sometimes over this. I have been managing Central Marine since 2005. I experienced my first algae bloom that year. We have done a lot of studies. We've done a lot of testing. I've hosted at our marina for free South Water Florida to come in and do core testing of the St. Lucie River two different times. We do have results from this, I'm sure, somewhere. We also -- I have experienced algae bloom in 2005, 2013, 2016 and now present. I also have concerns of what the future of my health may possibly be after being exposed to these chemicals for these many years. At this point, I would welcome you, your staff and anyone to come to our marina and witness what has been going on. We have this green every day, whether it's in the water column or on the top. The seawall turns a blue color, which I promise you means this water is toxic. I approve of this reservoir. It needs to be bigger. We cannot sustain all of the water that's coming in if we don't look at a larger footprint. Thank you so much. We have a lot of concerns. And I appreciate your time and effort in trying to understand how to resolve it. Thank you.		x		x			

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	If your comment has an "x" in columns C, D, E, F, or G), please see the corresponding word document for a response. This project had many similar comment themes, and therefore, the responses are located in a word document.							
Commentor	**Comment**	Polluting estuaries, water quality/Public safety concerns	Solution too small	Solution takes too long/Immediate action needed to clean water and/or stop	Support	Stop sending water to estuaries, send south to Everglades	Other*Responses in "Additional Respones"	**Additional Response**
Peter Derby	Please do whatever you can to preserve our state's water and other natural resources....				x			
Suzie Modoux	Please stop draining this highly polluted lake into the St. Lucie River....its not worth it. You're poisoning our water. We can't even swim in it. You're ruining our fishing and tourist industry. Who would want to visit when the water is coated in toxic blue-green algae? Please fix it ASAP. The people of Florida voted for it 4 years ago. This is criminal, unethical and wrong. A response one day to one of my emails would be nice.	x						
Nicole Rupp	Just in time for summer, while Lake Okeechobee releases its toxic waters into our rivers and now our citizens, children and tourists are unable to enjoy our waters. I can't believe businesses and just pure enjoyment has to be affected because of this. Again our rivers will need months of flushing out the toxic water to actually look inviting and become nonthreatening to the citizens and neighbors of Martin County. Why is this continuing to happen year after year? This needs to be resolved immediately. Enough with the postponing send the water South just like it had been for years and years. Being a fishing and water community, being afraid to enter the water because of toxic algae is just wrong. How many more people need to become sick and loose limbs or animals needs to die and ecosystems to possibly never recuperate to finally make a change?	x						
Lisa Standing	Army Corps, Stop the Lake Okeechobee discharges immediately! Our waterways, communities and biological ecosystems are being destroyed. Residents in communities on both sides of the state of Florida will no longer put up with living with toxic waterways caused by the irresponsible water discharges.	x		x				
Doris Dillon	The dumping of the algae laden water from Lake Okeechobee must stop until absolutely necessary. The releases that are currently happening are in anticipation of the rainy season but the lake is not at the level where the releases are necessary. It is currently just slightly bout your required minimum so why are you releasing it now? The reservoir needs to be built ASAP and needs to be as large as possible. Until this can be done alternative storage of this polluted water needs to be used as a stop gap measure. This algae is killing The estuaries to the east and the west because of the releases from Lake O, meanwhile the Everglades are starving for water. The flow of water to the south has been stopped by the dike and never should have happened. This is a man made disaster and it needs to be solved now. Restore the flow save our estuaries and Everglades.	x		x				
Laurie Lorch	What IS your ultimate goal, who are you ultimately responsible to? Today I will attend another Rally to Save Our River! I've been doing this for 20 years, what's it gonna take for you to admit you got this wrong and stop killing us? The solution is to restore Florida natural water flow starting in Orlando and the Kissimmee, return it to the slow flow which allows the water to be filtered and cleaned before Okeechobee. Then allow the excess to sheet south through the Everglades and cleaned further to Florida Bay. Send it South, Stop protecting subsidized agricultural interests over citizens! I moved to South Florida (Jensen Beach) and wondered why our rivers were never clean, until I learned the awful truth about the series of terrible mistakes & short sighted solutions causing it, and now life threatening. Man up, admit you mistakes and work to fix this, where is your humanity? With the destruction of our waterways growing worse and worse every day, the Army Corps is collecting feedback on the SB10 southern storage reservoir.	x		x				
William Murphy ESQ Stuart, Fl	So, in 1904, it took 10 years to build the Panama Canal. And in 2018, it will take 20 years to create a reservoir south of the lake because the government won't buy the Sugar Cane farmers out? The corruption runs so deep in government it is sad. I have lived In Martin County my entire life. Each year the water get dirtier. The water did not use to kill everything. Now it does. You people know it is is toxic to marine life. The facts is, the aquatic environment of Florida is on life support from the springs of North Florida all the way to the keys. Florida has allowed development and agriculture pave over and pollute the land. The lake is a toilet and septic tank, and when it overflows we are the pipes that dump the crap. If you won't clean it at the source, then you need to clean it before you dump it. As small as this reservoir is, I support it because it has to be better then what we have now, and there are NO ALTERNATIVES that you are willing to take. And by YOU I mean the State and Federal Government.William Murphy ESQ Stuart, Fl	x	x	x	x			
James David	As a regional resident, and former coastal county department director with 32 years of coastal management and restoration experience, I'd like to suggest implementing a settlement aeration protocol for the newly proposed reservoir to prevent the anticipated settlement of organic compounds predicted for the reservoir from developing anoxia-based nutrient recycling.				Suggestion for organic compounds			
Patricia McCain	The residents of Florida are fed up of the neglect of our counties being poisoned by The Lake Ocheechobee it is inconceivable that "We" the residents pay HIGH TAXES to live on the water and we are getting poisoned, marine life is compromised affecting the life of "us"residents as well as the wild life with detrimental consequences at times including deaths for humans. Enough is enough. We demand a solution. I pray that the meeting that will be held on June 28th will have a positive outcome.	x						
Tim Arthur	It's not hard. Don't send algae and kill wildlife, kill home appreciation and kill tourism. Filter it - yes you can find the money - or send it south — or send it in small doses to ALL outlets. We just ask you do your job, as environmental engineers. Please and thank you. When I was a kid, Lake O was bigger and we never had this problem.	x				x		

Mike Downing	I am a retired Chemical Engineer who winters in Southwest Florida. I bought our Florida home over 15 years ago and have seen a steady decline in the water quality over the last 10-12 years. It has been most noticeable over the last 5-7 years. We used to be able to see glass minnows, snook, baby tarpon, ladyfish, etc. in our canal but not anymore. It is truly sad to see the destruction in water quality due to Lake O. discharges.	x				x		
	I fully support the EAA reservoir! However, I need to register the following objections to the current EAA reservoir plan:				x			
	1) It is far too small. The current estimate is that it will take 10-20 years to build. The water quality in Lake O. will probably decline even further with the population growth expected due to retiring baby boomers. Discharges from Lake O. will further deteriorate the currently unacceptable water quality in SW Florida. The USACE needs to get ahead of the curve or you will be forever playing catch-up. Increasing the size of the EAA reservoir will also improve USACE's current poor image with the public.		x					
	2) The EAA reservoir water will need to be further cleaned up before it is released into the Everglades. The Miccosukee Tribe will likely block the USACE from releasing the EAA reservoir water South unless it is cleaned up.	x						
	3) The USACE needs an interim Lake O. release plan since the USACE will have destroyed our Southwest estuaries in the 10-20 years to build the EAA reservoir.			x				
	a) The current 10-20 year timeline is far too long and needs to be compressed. While government might find 10-20 years to be acceptable, in the business world we would not accept the unacceptable and would demand the timeline be reduced to 5-10 years!			x				
	b) While I do not like the concept of injection wells, I believe the USACE has forced the Southeast & Southwest Florida communities to accept the use of injection wells in the interim.				x			
	c) Our Southeast & Southwest water quality problem comes from bolus releases of Lake O. water. The USACE needs to smooth out the curve by using a more continuous discharge flow.	x						
	Lastly, Florida has a Golden Goose that lays Golden Eggs. That Golden Goose is tourism & retired seniors. It is time for the USACE to understand that you are killing our Golden Goose in South Florida with you current Lake O. discharges. Please do something before it is too late!			x				
	My Master's thesis 45 years ago was on Biological Oxygen Demand in Water. It is truly sad to see the destruction of our estuaries due to the biological oxygen demand from USACE's bolus discharges from Lake O.!	x						
Anthony D'Andrea	I am writing to you in regards to our current water conditions here in South Florida. Living in this area since 1987. As well spending most of my summers down here since 1976. Putting in about 10~15 hours a week on a local body of water in our area someplace; I can say in the past five years, I have seen the quality of life on our waters fall to the lowest I have ever seen.	x						The Corps of Engineers is sensitive to the environmental concerns and challenges presented by releases from Lake Okeechobee. We take every opportunity to minimize the adverse impacts of potential releases. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
	Coming from one of the most polluted states in our country, NJ. I have seen how bad mismanagement of land can get for the people. I know first hand what an asthma act looks like from an algae bloom. As well, what itchy eyes and skin feel like from a bloom. As I write this, I have those very symptoms from the time I spent out on Lake O yesterday fishing a charitable tournament for a young father who recently passed. We have a very low turn out due to the known water issues in the lake right now.	x						
	I understand what it means to follow orders. However, I also know a mission's core once define you have a duty to uphold no matter what orders are given to you once committed to action. Your team's mission is to protect citizens lives in regards to management the Hover dike around Lake Okeechobee. This mission of yours at a federal level I understand is challenging. The support our state government is offering is thin to stay the least. However, your mission is life critical to millions of citizens. You have the authority to define and enforce all actions in the protection to peoples' lives when it comes to managing the dike and discharges.						x	
	So please do understand the toxic waters what are now at the edge of your dike, is a clear and present danger to millions of people if you dump into the waters that will flow thru their towns and backyards.	x						
	You have the right to commit other acts than just opening and closing gates and waiting 7+ years for more storage to be built to protect the people of FL. If need be, you can seize control of the SFWMD system to ensure it is being managed for the best use for protection of human lives. As well you can command local law agencies to close contaminated areas that you are forced to create when the discharges are required. It cannot be voluntary for local governments to choose when to close an area. As well, our CDC can give you support in know when this required.						x	
	Other actions are using our state water quality systems to know when areas need to be closed due to required discharges of this toxic water. These are actions that are required in this recent times.						x	
	Our state government lacks the ability/will to protect us from your discharges. So they leave your team little choice in the protection of human lives for completing your mission. The action is needed now to ensure we are protecting the people. This is life critic at this stage and each passing day this summer this threat will grow.			x				
James and Margaret Krow	The reservoir at 23' deep is just going to be another Lake Okeechobee with expensive dike problems. Its footprint need to be larger to so that it can store more water with less depth. The 65 acre man-made marsh is too small to clean enough water.		x					
Noel Linday	It is completely unfair that residents of and visitors to the Treasure Coast must suffer from the toxic, smelly and unsightly effects of discharging unsafe water from Lake Okeechobee into the St. Lucie River. It is imperative that the Southern Storage Reservoir be expedited to reduce the occurrences of these discharges.	x		x				
David Kapell	The continuing discharges are a disaster for communities on the east and west sides of Florida. I understand that you cannot allow the water level in the lake to rise too high, or it will endanger the dam. We need to either reduce the amount of water entering the lake, or provide another place for it to go when it leaves the lake. The current plan proposed by Senator Negron should be implemented ASAP. Yet even this plan is not enough. We need a larger water storage area, and we need to send more water south to the Everglades. The only thing preventing these actions is the power of the sugar lobby. Big Sugar has too much control over the Florida Legislature. It is unconscionable to let the interests of a few people in the sugar industry ride roughshod over the legitimate needs of millions of other people.	x	x	x				

Donn Bearman	The St. Lucie River & Indian River are in dire need of help. They have been for many years. Yet no help has come AT ALL. Now you finally have a chance to do “some” good, even if not the perfect answer. Please see that this reservoir is built as quickly as possible...it may already be too late for a lot of things.	x		x	x			
Arthur Boinay	Stop the discharges from the lake and direct the water South. If the Army Corps can’t do its job properly perhaps it’s time to get rid of the Corps and its hacks and give its function back to each State.	x						
Charles Thayer	Green algae from your discharges was flowing along the river and into our canal within days of your first discharge! This situation must be unacceptable to everyone and the only solution is to correct decades of bad planning and start correcting the core problem and move the water south before you completely destroy life in our waterways. This reservoir is essential and only represents a start in the right direction.	x			x			
Fred Hoffman	I agree with Congressman Brian Mast that our water systems are in danger. He has conducted tests on our behalf. Listen to him and review his findings.	x						
Lawrence Terhaar	STOP IT! JUST STOP IT!					x		
Patricia Lloyd	We love our River, we live not far from Indian River drive. The smell from the toxic algae is so horrendous at times it actually nauseates ! Please make every effort to change this. Thank you so very much.	x				x		
Kenneth Nassor	Stop polluting our waters! You need to find another way to discharge the polluted water.	x				x		
Gary Hickman	COE keeps violating the Clean water Act of 1972. Solve the problem: cut off all water to the sugar farmers south of Lake O for 5 years and buy the land back cheap.	x						
Ryan O'Hare	My name is Ryan O'Hare and I live in Jupiter Inlet Colony, a neighborhood on the north-side of the Jupiter Inlet. Since the dumping has begun, the difference in water quality has been astounding. I can literally smell the foul-smelling waste water over a hundred yards from the water. Please reconsider the current dumping scheme. Thank you.	x						
Mark Lynch	It is an environmental disaster. It’s awful, irresponsible and we are just seeing the he tip of was he ice berg as far as damage. Please don’t further destroy our once beautiful environment.	x						
Carol Wands	How did this plan start and where was the water anticipated to go if it began to flood? You MUST DIVULDGE YOUR PLANS PRIOR TO THIS ISSUE SO THAT WE UNDERSTAND WHY you made the choices to do so.						x	Please see Chapter 3 of the Final EIS and Chapters 3 and 4 of the SFWMD Report that explains the decision making criteria in coming up with alternatives and a recommended plan.
Shirley Bradley	Good morning, I cannot make it to the meeting on June 28th at the Blake Library but I would like to share my thoughts. We live on the south fork of the river just north of the locks. The current state of our water is a disgrace and it seems to be an annual occurrence every time the discharges begin. Yesterday afternoon there were swirls of green algae on the top of the water behind our house and I'm sure it's only going to get worse. Two years ago you couldn't tell where my grass ended and the water began - we had so much algae in the water. Not only is it a public safety issue, it hits all of us that live on the water with a double whammy. We live on the water because we want to enjoy fishing, going to the sandbar, snorkeling, etc. Multiple places along the river have been posted with no swimming signs due to the toxic affects of the discharges. There is no way I, or anyone, would want to eat any fish from this cesspool. Plus we are afraid to get in the water as well. I even worry about being splashed by the water while boating. There has to be a solution that will stop the annual practice of ruining our summers and our water. I understand the lake levels need to be lowered but the building of the dyke and the flushing of water runoff east and west has to stop. The water needs to go south to the everglades. The everglades is dying because it doesn't get enough water and our waterways are dying because we get too much. Obviously, there are political forces involved in this which doesn't help. Everyone has an opinion on who is to blame. I don't care who is to blame I just want a solution. We are killing our beautiful environment and the wildlife that depend on it. Please, please, please find a way to stop this.	x		x				
Barbara Collins	It is clear that our water is being polluted! Year after year we face a crisis of our rivers being polluted affecting not only the birds and fish we are famous for, but also our own health. Let’s make our water supply clean and great again!	x						
Robert Bemis	the water in the lagoon by nettles island is not fit for sea life	x						
Kathy Murphy	What an environmental nightmare! Our estuaries are dead, businesses bankrupt, sea life gone or covered with lesions! Don't you people live here too??? What a black eye for our state!	x						
Roddy Wood	The southern storage reservoir is ordinary common sense. It restores the flow of fresh water into the Everglades, as nature intends. The plan reduces the water level in Lake Okeechobee, helps restore the Everglades, and reduces the algea problem in the St Luci River. Any other solution politically motivated to appease the sugar industry.				x			
Michael Mocerino	My family just moved here a little over 2 years ago from Illinois, we were hoping to enjoy the beautiful weather and the Beautiful Waters of Southeast Florida, however that is truly not the case in respect of the water in the Saint Lucie River I welcome you to come and take a look at the water quality and the dead fish in and around my property everyday I see more more different species and it breaks my heart!! Please please do something to stop the discharge at once!	x		x				
Susan Burgess	Please FIX YOUR DIKE instead or wrecking our lagoon!!!	x					x	Construction is currently underway to reinforce the Herbert Hoover Dike. Construction is expected to be completed by 2022.
Gary Vanderwood	I live on the inter coastal in Stuart near the inlet. It’s a disgrace how polluted it has become. There are fewer birds and wildlife. Fishing, forget it. You are destroying our estuary for ever if you don’t stop now. It is at dangerous levels to swim and use for recreation our property values will plummet. Have the common sense to understand the Hugh impact it has on the entire area. Please STOP	x						
John Lovett	I am a MartinCounty resident. Please stop using the river as a dumping ground. Any plan to alleviate the dumping will work. It is time to act before the river dies. Thank you.	x		x	x			

George Chapas	Scalable nanobubble technology to mad transfer any gas into water. We import to US carbon ceramic, low pressure, 20-29 PSI gas, any flow, gas flows through ceramic water over and around surface, no moving parts, no clogging, hydraulic scrapes nanobubble off surface. About 94% of gas transferred is consumed in water will not off gas, remains in water long time 15 day half life depending on water chemistry. Google Mr Anzai, Nanobubble and see. Many open body water tests in Japan conducted with leading universities. Anzai Kantetsu patent holder inventor.I live in Saint Augustine, FL office in Stuart FL as well. Can send papers to contact point if interested.						x	Thanks for you comment and please send the suggested papers to to USACE, Attn: Stacie Auvenshine, PO Box 4970, Jacksonville, FL 32232 or electronically to EAAReservoir@usace.army.mil
Judith Marcinkewicz	It's great you are finally going to hear from residents at the June meeting. But, why schedule when the majority of our residents are away for the summer? Makes absolutely no sense!!! Our community has a marina on the South Fork of the St. Lucie River and has had to endure the discharges, algae, and polluted water, for many years. We can always tell when the river is at its worst because the fish and dolphins no longer swim up to our community. Let's hope a solution can be found soon.	x					x	The meetings were planned to occur within the 45 day public comment period for the draft EIS, in accordance with NEPA. In addition to the Corps public meeting, the SFWMD held several public meetings during their planning process for this project over the last year.
Mike Forrest	Enough is more than enough. We have suffered years of water discharge causing pollution of our environment. Stop it!!!!	x		x				
John Lafean	Please add my name to those in favor for immediate relief from discharges into the St. Lucie water systems. I believe them to be dangerous to wild and human life.			x	x			
Lorraine Martucciello	I live in the Harborage Yacht and Marina Condos, in Stuart, DO with a terrace overlooking the South form of the St Lucie river. Toxic pages blooms last year caused dirty, smelly, insightful water to prevent me from spending anytime on my terrace. I worry that discharges this year will cause the same things to happen. I am also worried about health issued since I have asthma and numerous allergies. PLEASE find another solution for high water levels in the Lake!! Send it south, etc...	x						
Wayne Elliott	Thank you for addressing this self inflicted mess. It was created with the best of intentions and now needs correction.				x			
Charles Fallow	My family lives in Sewalls Point on the SLR for three decades. We no longer use that waterway to fish or recreate because of the continuous deterioration caused by the relentless Lake O discharges. Our wildlife is decimated, the river and adjacent waterways including the ocean are polluted. The riverbed has been obliterated by multiple feet of muck and silt causing sea grass and oyster death and upsetting the entire balance of flora and fauna. Any private entity conducting business in this way would have long been gone and their personnel serving long prison terms. What right do you have to destroy our environment? It's an omnipotent corrupt federal government paid off for decades by the sugar industry that's the explanation. We are exhausted hearing about the "precarious" condition of the Hoover dike and your lame feckless excuses about the lack of storage reservoirs, etc. You are obstructionists. Talk about man made global warming? How about the deliberate US Army Corps of Engineers annihilation of our waterway, decades of abuse without any accountability. Our business community has suffered economically and our property values diminished because of these rampant discharges and lack of any effective response by you to permanently resolve the issue and restore our vulnerable waterways.	x					x	The Corps is planning multiple studies to restore the ecosystem in South Florida and the Everglades.
Mary Anderson	I am unable to attend the meeting at Blake Library on June 28, 2018. I am a resident of Martin County. I am requesting that you discontinue discharging Lake O, into our county. I live in Port Salerno where we are dependent on our area for fish. You are killing them. Stop Now	x				x		
Ken Petropopulos	Current discharge policies are completely unacceptable for the health and well-being of not only an incredible rich River and ocean ecosystem,but also for all of us who live and work and depend on our rivers and ocean for our lifestyle and our lively hood. We need to let the waters flow south again and replenish in the same action not only our rivers but the Everglades themselves. To jeopardize our national Park and our rivers for some sugar producers is unpatriotic and only helps a few. It is high time that the corps work for the people and not the corporations. Why does the corps put the private minority over the public majority? For whom does the corps work for? And who pays their salary?we need to take back our public institutions so that they work for the public good!	x				x		
William James	I live on the St Lucie Inlet. This year, even before discharges from Lake Okeechobee, with the runoff from the unseasonal rains, the water in the inlet has been foaming with pollution from agricultural and septic runoff.Based on past history, when discharges from the lake have caused major pollution problems, it an easy prediction that this year will be worse. We need an alternative.	x						
Louis Mazzucchelli	MY NAME IS LOUIS MAZZUCCHELLI. I HAVE BEEN WATCHING WHAT YOU ARE DOING TO OUR COMMUNITY! YOU ARE NOT WORKING FOR LIBERALS, YOUR WORKING FOR ENTIRE COUNTRY ! SO STOP YOUR BS AND GET DOWN TO BUSINESS!YOU WERE ALLOCATED MONEY TO FIX THE DIKE SOME TIME AGO WHAT HAPPENED TO THAT MONEY? NOW YOU HAVE MORE! DO THE RIGHT THING AND STOP SERVING BIG SUGAR! WE ARE PLANNING A DEMOSTRATION AT THE FLOOD GATES UNLESS YOU STOP! OH BY THE WAY WE ARE ALSO GOING TO DO A RECALL OF YOUR BOSS!	x					x	The Herbert Hoover Dike rehabilitation is expected to be completed by 2022.
DeAne Urban	WHY cannot the water be sent south? POLITICS I KNOW. Sugar people paying Rick Scott and friends off. WHEN ARE WE GOING TO SENT THE WATER SOUTH? AND STOP DESTROYING OUR WATERWAYS??	x				x		

Seth Taylor	Please explain to me how discharges from Lake "O" into the St Lucie River System does not violate the Federal Clean Water Act.	x						The Corps of Engineers is sensitive to the environmental concerns and challenges presented by releases from Lake Okeechobee. We take every opportunity to minimize the adverse impacts of potential releases. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
Pat Glenday	I live near the manatee pocket and visit the restaurants there weekly. Not only is the algae sickening the water, ruining the environment and hurting wildlife but the businesses in the pocket are suffering. I applaud my congressman brian mast for leading the effort to stop the discharge into our area.	x			x			
Brian O'Neill	Stop the discharges from Lake O. Our estuaries and coastal beaches are dying as a result of the nutrient loads in the lake water. The reservoir south of the lake needs a bigger foot print and needs to be built ASAP.	x	x	x	x	x		
Ron Dierolf	My wife and I own a home on a canal just off the St. Lucie River. For the past two summers we have been unable to fish or swim in the river or off of nearby beaches. Two years ago one of our granddaughters became ill due to accidental contact with the water and so, consequently, we have been unable to take them boating since that time. At times the fumes from the water have been so bad that we cannot swim in our backyard pool or sit in the yard or on our dock.	x						
	The discharges from Lake Okeechobee (it should be renamed Lake Toxichobee) have been making people ill, killing fish, hurting property values, and hurting the tourist industry. It also hurts businesses in the area as it is difficult to get dock work done.							
	Government has been reluctant to address the issue, as has been the Corps of Engineers. The primary reason for this has been politics and money. Big Sugar and other industries in the watershed feeding Lake Okeechobee have been allowed to pollute at will and without fear of legal action. Sewage and septic tank discharges to the watershed have likewise been unregulated.							
	My wife and I are older and would like to sell our home. However, the water situation has lowered our home value between an estimated $50,000 and $100,000. It is difficult to sell a home when the water in your backyard is green and gives off fumes that make your eyes water.							
	A plan other than the convenient discharge to the St. Lucie River must be implemented. For too many years the river and Martin County have been a convenient sewer for the Corps of Engineers. You are compromising our health, our economy, our livelihoods, and our property values.					x		
Sheri Piergeorge	STOP THE RELEASES!!!!!!!! WE HAVE HAD ENOUGH OF YOU DESTROYING OUR WATERS AND WILDLIFE!!!!!!!!!!!!!!!	x				x		
Alfred Ipri	Please note the enclosed pictures. They were taken off Coral Cove beach in the "Atlantic Ocean". They show a fish infected with popeye disease which, to my knowledge, has never before been observed in the Atlantic Ocean, It is typically found in Aquariums when the water is extremely contaminated. The implication is that the ocean water off Coral Cove Park is extremely contaminated. If steps are not taken to reduce the contamination serious problems for both fish and people may result.	x						
Jerry Appell	I am a member of a local kayak club that usually enjoys paddling the Indian River and going for a swim at one of the sand bars or islands. We are now forced to look elsewhere, today we paddled out of River Bend Park down the Loxahatchee. The waterways influenced by Lake O discharges are off limits.	x						
	Please do what it takes to bring our waterways back to a state that they can be safely used for recreation.	x						
Hilarie Davis	Thank you for examining the extreme environmental problems of the Okeechobee releases. I applaud your efforts to find a solution. The latest plan, however will take much too long to implement. Our estuaries are dying and will not survive the wait of 7-9 years. You need to find a solution that can be implemented more quickly.			x	x			
Greg Korte	I have noticed that if algee is floating on the surface, just spraying a little clorine at the algee causes it to dissipate and die.						x	Thank you for the comment.

Judy Safewright	These discharges from Lake Okeechobee have caused the pollution problems in the St. Lucie River for many years causing fish and oysters to die, high levels of bacteria. marine businesses to shut down completely or move to other areas, and decreasing river front and canal property values. The smell of the stench is unbearable to be near it and it causes health problems. Our government has caused the problems when they stopped the natural flow of the water to the south of Lake Okeechobee and it must be restored permanently now. Our government has spent billions of our tax payer's dollars year after year to try to solve the pollution problems without any real results. Every time our government changes something natural it is a disaster. We can not keep allowing big money businesses to destroy our state and economy for their corporate gains and letting politicians use this for photo optics to make hollow promises. It is time for the Army Corps. of Engineers to give us some real answers, permanent action solutions, and the truth. Stop experimenting and wasting our money.	x		x				
Marilyn Nader	I understand from Congressman Mast that there will be an upcoming meeting on June 28th to discuss water discharges into our community and whether the water being released is safe. I cannot be at this meeting, but I am very concerned about this subject. I know that this situation greatly impacts Port St. Lucie and the surrounding areas. Please do everything possible to insure that our safety is insured.	x						
Armita Fucci	I will be unable to attend the upcoming meeting at the Blake Library in Stuart. However, the cleanliness of our water is extremely important to me and my family. I invite you and your children to come for a swim in our water. Are you confident and comfortable enough to do so? If not, as I suspect, then take immediate and appropriate action to provide safe, clean water to St. Lucie and Martin counties.	x						
Marilyn Muller	We need to direct Lake Okeechobee waters into a much larger resevoir than planned so that the rivers and estuaries on the coast do not become polluted with runoff. The algae also presents health problems for all who come in contact with the stuff even down in Jupiter. Please save our environment.	x	x			x		
John Moffitt	Sorry I cannot attend, I will be away sailing in unpolluted waters. I no longer keep my boat anywhere around Stuart, even though I live here. The water is a disgrace has needed immediate attention for 20 + years.	x		x				
Barbara Garrett	I live along the St Lucie Waterway, in Indiantown. I have a vested interest in the health of Lake Okeechobee however all of south Florida has a vested interest in its health. I have read "that the Assistant Secretary of the Army for Civil Works has transmitted a favorable U.S. Army Corps of Engineers analysis of the plan". [TCPalm 06/01/2018] Speed is of the essence. I understand the wheels of government can turn slowly, however with summer upon us the algae blooms will grow and become toxic once again. If the ACE has 'favored' the plan, the OMB should respect this opinion and quickly give the 'OK' to the ACE to submit; where the Senate Environment and Public Works Committee and the House Transportation and Infrastructure Committee have already a spot waiting for the plan. PLEASE encourage a speedy resolution to this issue. So many people depend on this plan. The environment depends on this plan. I am only one voice. Please hear me?	x		x				
Connie	WHEN the river was polluted in 2015 I became ill with a rare bacteria either soil or water as the cause. I am suffering yet today. Since i am not working in soil nor playing in soil, I have to believe all my sinus conditions and problems in the past two years stem from this pollution. That is just one side of the coin I also am an environmentalist and the discharges are disgusting and political!!! Along with giving the BIG SUGAR GUYS FROM CUBA all their blessings which harms the everglades what more can destroy Florida and working peoples lives.	x						
Deborah Mitchell	I have only been a resident of Stewart for 2 1/2 years, but in that short Time spent I have seen the degradation of our river. I am a boat owner and I keep my boat at sunset bay marina in Stuart. The water there is absolutely filthy whenever dumping is going on. I find it hard to believe that our government would allow this wide spread destruction of our ecosystem to occur. I am old enough to remember the dumping that used to take place in rivers from chemical companies in the 50s 60s and 70s. There was a national uproar about it and the rivers have improved her medically over the past decades. It's time for the St. Lucie River to get the same treatment. Send the water south, as mother nature intended it.	x				x		
Molly Thayer	We live in Palm City with our boat docked behind our home, just off the South Fork of St. Lucie River/intracoastal waterway. For over a week we have been experiencing green algae blooms in our canal. Normally, we would enjoy kayaking in the nearby waterways but are afraid to do so because of the toxicity of the algae. The water quality is currently rated at “F+”. The discharges from Lake Okeechobee are an ongoing menace to our health and the life of the estuary. They have a negative impact on our economy which centers around boating and tourism. The water being released must be redirected to the south to additional reservoirs for removal of nitrogen, phosphorus and other harmful substances. This debate has gone on for ages-it’s time to take action before life in the estuary is beyond all hope of recovery. PLEASE STOP the discharges.	x				x		
Chris and Jude Carr	We are 100% behind Congressman Brian Mast fight against releases from Lake Okeechobee. We are kayakers and we can't use our kayaks in fear of contracting some diseases from the algae. Not only that we live along the South fork of the St. Lucie river where the releases flow to the ocean. You can smell the water with the algae blooms in it when they are released. If this algae gives off such an oder, you know that it is getting into your lungs. My wife and I have breathing problems normally but when the algae is released it gets worse. Something has ton be done about these releases NOW.	x		x				
Cris Panebianco	I respectfully request information of the water quality of the water entering Lake Okeechobee, the water in Lake Okeechobee, and the water being released from Lake Okeechobee into south fl water ways. Regardless of the lake lakes level I respectfully request the army corp stop the release of water until they can prove the water quality is not a hazard or health concern for human or wildlife interaction.	x				x	x	Water quality data is publically available through the SFWMDs Water Quality Database--DBHYDRO available at https://www.sfwmd.gov/science-data/dbhydro. Summarized data is also available from SFWMD Governing Board Public

Bill Ramsey	We use to kayak in our hometown Stuart area, but we no longer can. The proposed reservoir is of no real help. Trump can build an unneeded wall but can not save the environment. Why does the USACE permit this to happen? Please speak up and protect Florida's waters.	x						
Thorney Pattenaude	The water needs to be sent to the everglades where it will be cleansed. I cannot understand why our government insists on sending bad water into our rivers. You should be ashamed to do that.					x		
Beverly	I am telling everyone I know considering a move to Florida, not to come here. There is too much Big Sugar power which is ruining our waterways. I am from Stuart, and had previously told anyone that Stuart was the happiest, prettiest town in Florida. But now it is ruined because of greed.	x				x		
	I admire Rep Brian Mast for being the first one to step up to the issue and also take no money from Big Sugar. Stop ruining our water!							
	Send the water south.							
Ruth Berman	many times we have attempted to go kayaking in Suart. When we arrived at the river , we were greeted with a sign that said we were unable to use river due to dangerous discharge causing unsafe conditions. This is unacceptable!	x						
Virginia Shea	I wish to heaven I could make it to the June 28 meeting in Stuart at which you will be present. Unfortunately I am working that day. I have been closely following, through Brian Mast, Joe Negron, Everglades Foundation, Captains for Clean Water and others, the state and quality of our water over the last several years.	x		x		x		
	The Army Corps has an obligation to hear and act on the concerns of the people of Florida, the people who love this beautiful state, the people who freely and honestly pay taxes, the people who are concerned about our very fragile environment, who want the Army Corps to halt the pollution of our water on the east and west coasts.							
	It is undeniable that water being released form Lake O has a disastrous effect on the Indian River Lagoon and south and the Caloosahatchee River and the Gulf waters.							
	I urge you to listen to what people are saying at the meeting and to act with swiftness to protect our waterways.							
actmarinc	It is way past overdue for serious and substantial action to eliminate discharges into the East and West coasts. Send the water south where it was and still belongs to go.	x		x		x		
Mark Sapirie	I write to express my support for Congressman Brian Mast in his effort to stop dirty water flowing into our scarce yet vital coastal waterways. Our littoral waters are essential habitats for numerous species. It's a delicate ecosystem and the discharges are deeply disruptive. The health, purity, and safety of these waters is also critical for many Floridians who live and work in and around them. These waters are really a treasure for our nation and for visitors from around the world. It is a tragedy to continue to pollute them and indeed not to do everything that we can to make them clean again.	x				x		
	Please let us take up our responsibility and make it a top priority to stop releasing dirty water into these waterways.							
Darrell Smith	Why are your practices of dumping toxic polluted water discharges even a talking point? If corporate america companies such as DuPont, Dow Chemical, or Monsanto was involved in this practice, I am sure EPA and the DEP would have locked them up and shut them down a long time ago.	x		x		x		
	This lake issue, with the Big Sugar industry as stakeholder, was noted in an old Florida Sportsfishing Mag in September of 1988. 30 years later, the unteated water is still being floated down the river to St.Lucie and Fort Myer. The Indian river lagoon has been declining ever since. Sea grass and oyster beds are non-existent or badly destroyed. In the meantime, you are killing the Everglades, with a lack of brackest water. Oh, ...I forgot, that is a National Park and that is not allowed.							
	Millions of dollars and thousands of volunteer hours have been raised thru donations and grants to re-populate the waterways with sea grass and oyster, year after year, only to have them destroyed year after year.							
	If you want to do more studies, how about calculating how much water runoff from the Stuart and Ft. Myers communities contribute to the lake levels that you then discharge? That answer is “None”. The water doesn’t flow up current to a higher elevation. Then why are do our communities bear the burden to be the lake’s sewer plant. Any new “studies” should be directed at Orlando and their excessive lack of retention for their developments that feed into the Kissimmee River into the lake.							
	STOP this madness. It is truly sad to continue to destroy our estuaries for the present and future generations.							
Jinty Stewart	I am a snow bird with Stuart connections since 1the mid 80’s when my mother bought property in Martin County. The disastrous implications of dumping of freshwater from Lake O with was being debated then. Thirty odd years later, many research projects and hundreds of scientific studies proving the river is being polluted, the issue is still not being addressed. There have been several years in the past decade of toxic waters causing beach closures, job losses and severe if not deadly health risks to fish, birds and humans. Enough is enough. I am a member of the Treasure Coast Rowing Club, and there were many days prior to my departures late April, early May, when we were advised NOT to go in the water due to the toxicity. It’s sooooo beautiful at dawn, but at sunrise you see the green algae bloom and realize the river is being poisoned. The green slime has reached the Atlantic Ocean via the St Lucie Outlet. Imagine!!! Recent aerial photos show it’s now even spreading to the west coast and surrounding Sanibel Island.	x		x	x			
	Please ... do whatever is necessary to prioritize implementation of the reservoir south of Lake O that will address some of these problems. All efforts must be made to strive for clean water and healthy ecosystems for Florida. The current situation is a tragedy beyond words ... especially given human intervention could right this wrong! The future of South Florida/s water and the fish, birds, animals and humans who live in and along these waterways depends on corrective action happening NOW. Here’s hoping it’s not too late to see restoration become a reality.							
	Thoughts from a sad snow bird who longs for the return of a clean Indian River Lagoon and St Lucie River, where I can be confident my grandchildren will be able to swim without being exposed to toxins.							
Laura Hill	I’m so concerned about the sewage release into our waters from lake O. We want to live in the treasure coast not the sewage coast. Not only are we not able to swim or take our boats out or fish, Florida is losing tourism because of this. We are a smart world - why can’t we fix this?!	x						

Form Letter Titled Please Support Everglades Agricultural Area Reservoir - 488 emails received	As a recreational angler who is passionate about conserving our wild spaces and fisheries, the Everglades are extremely important to me. I urge you to approve the plans for the Everglades Agricultural Area (EAA) Reservoir and move ahead with their construction. This project is essential to the ongoing restoration of America's Everglades and improving the health of the entire south Florida ecosystem and the communities that rely on it.				x			
	In conjunction with other projects, the reservoir is expected to significantly reduce damaging, algae-causing discharges that inundate the communities along the Caloosahatchee and St. Lucie estuaries once completed. It will also help send an additional 370,000 acre-feet of clean, freshwater south towards the Everglades and Florida Bay each year.							
	America's Everglades is an iconic landscape for the nation with countless environmental and cultural benefits. Recreational fishing in the Everglades region alone supports nearly $2.9 billion in total economic activity and more than 26,000 jobs. Authorization of the EAA Reservoir in the 2018 WRDA legislation will avoid an unnecessary and costly two-year delay.							
	Thank you for your continued support for restoring America's Everglades, and I urge you to approve this critical project as quickly as possible.							
Jeff Bradshaw	Stop Please Stop the lake O discharge					x		
Mark Potter	Please do what's right and what is necessary to restore as much of the original watershed that made the Everglades the unique natural resource that it once was. Termination of leases and relocation of much of the existing EAA farm land between US27 east to the Miami canal is just the beginning. The construction of the reservoir, as described in SB 10, is another essential plan toward restoration. Thanks for listening, I grew up in south Florida, the Everglades was and still is a very special place to me and I would like to see it preserved.				x			
James Wallace (in addition to the form letter)	The Florida Senate voted for the restoration to begin in 2000 --- this has kept being postponed by developer's influence.	x						
	If the Army Corps of Engineers - who developed the canal system which is killing the Everglades (in the 1920's) - continues to ignore the restoration, then the resulting loss of the fisheries, wildlife and habitat rests solely on their shoulders.							
	Florida Bay will turn into a cess pool for our future generations.							
William Louda	Remember that a big deep hole in the ground or above ground is JUST storage and without ADEQUATE filtering marsh (STA) the water will just stagnate and be re-released in a nutrient state as bad or worse (evaporation/concentration) as it was received. Let's also go after the nutrient sources (cattle industry N and NE of the Lake/ Nubbin etc.), septic tanks in and around Taylor Slough (look at Google Earth and all the finger canals), et cetera ad infinitum. Hopefully this a preaching to the choir comment.	x						
Mike Conneen	My name is Mike Conneen and I run Anglers for Conservation, an organization that inspires new generations of marine stewards through education, conservation, and community outreach. We encourage future generations to get outside and enjoy what the great state of Florida has to offer, especially fishing. We are focused on educating the now, which is our children, to be great future leaders of this world. AFC does events all over the state of Florida. What makes our programs work so well is the kids actually catching fish. If you don't catch any fish the first time you go fishing, you might get discourage and think that the environment is dead and never want to come back. It's some of our first childhood memories that we make that molds us into the great humans we are. Unfortunately, I have personally witnessed the kids at our events catch less and less fish over the last 5 years. Catching less fish is directly connected to the mismanagement of all Florida waterways, including the Everglades. I'm constantly questioned by parents all year long about the health risks of their kids fishing in our waters and at this point, I don't typically have great news for them except to inform them it's at their own risk. Yes, it's at their own risk but it's also at the risk of every child, adult and dollar that this state withholds. Please send the water south for sake of ourselves, our environment and our future. As a recreational angler who is passionate about conserving our wild spaces and fisheries, the Everglades are extremely important to me. I urge you to approve the plans for the Everglades Agricultural Area (EAA) Reservoir and move ahead with their construction. This project is essential to the ongoing restoration of America's Everglades and improving the health of the entire south Florida ecosystem and the communities that rely on it.				x			
Chuck Pickover	I am 65 years old and was born an raised in Miami, FL. It is truly unfortunate that most individuals involved in decision making have not see first hand the negative impacts and the destruction of what once was a pristine environment. I remember all the beautiful living reefs in the Florida Keys. Now most of the coral is dead. I remember when Florida Bay was clear with beautiful sea grass in 5' and 6' of water where it is now turbid and mud bottom. I remember Flamingo and the 10,000 Islands with lush shallow flats with oysters and sea grasses full of life. The grass is dying even in the shallow zones. I remember Charlotte Harbor, again with lush flats, Oysters, huge schools of Redfish, tons of Trout and just full of life. Same story, it is dying. I remember the small commercial hook and line fishing boats able to make a living with the abundant numbers of Sea Trout in both of those locations. They are all gone. I don't have the early life experience in the Indian River Lagoon and St Lucie estuary, but I have witnessed 20 years there. I did not have an opportunity to experience it in it's glory, but I have seen it go from good to bad. I also remember the St Lucie estuary making a comeback during and after the severe drought which brought the lake to extremely low levels. Fishing and the waters definitely improved which proves to me that mother nature can repair herself. As a recreational angler who is passionate about conserving our wild spaces and fisheries, the Everglades are extremely important to me. I urge you to approve the plans for the Everglades Agricultural Area (EAA) Reservoir and move ahead with their construction. This project is essential to the ongoing restoration of America's Everglades and improving the health of the entire south Florida ecosystem and the communities that rely on it.							
	In conjunction with other projects, the reservoir is expected to significantly reduce damaging, algae-causing discharges that inundate the communities along the Caloosahatchee and St. Lucie estuaries once completed. It will also help send an additional 370,000 acre-feet of clean, freshwater south towards the Everglades and Florida Bay each year. America's Everglades is an iconic landscape for the nation with countless environmental and cultural benefits. Recreational fishing in the Everglades region alone supports nearly $2.9 billion in total economic activity and more than 26,000 jobs. Authorization of the EAA Reservoir in the 2018 WRDA legislation will avoid an unnecessary and costly two-year delay. Thank you for your continued support for restoring America's Everglades, and I urge you to approve this critical project as quickly as possible.				x			

Lonnie Harvey	As the Army Corps of engineers has made such a mess of the Everglades in the past, and as the nonnative Flora and Fauna has about completely killed and eaten or starved everything out. Give the Indians what they want and fill in the rest for houses. As you know a large portion has already been built on @ The City of Sunrise. The only way to truly fix the Everglades is drain the water and burn it to the limestone basin. Who has the intestinal fortitude to do that????????!!!!!!!!!!!!!						x	Thank you for your comment. The Corps and SFWMD are working within our means to restore the Everglades.
Brett Huff	As a lifetime resident of Florida who is passionate about conserving our wild spaces and fisheries, the Everglades are not important to me comparing to other issues in our nation and state. I urge you to disapprove the plans for the Everglades Agricultural Area (EAA) Reservoir and not to move ahead with their construction. This project is nonessential to improving the health of the entire south Florida ecosystem and the communities that rely on it. South Florida will continue to over populate and destroy any efforts over time. South Florida cannot heal until the population is diminished. People will continue to water their lawns every day with nitrates running into the ecosystem at alarming rates. Water company's will continue to drain Florida's aquifer until people stop paying for water. It's truly sad yet it's our reality here in Florida. Thank you for your continued support for restoring America, and I urge you to disapprove this project and find more conservative means in spending tax dollars.						x	Thank you for your comment. The Corps and SFWMD are working within our means to restore the Everglades.
Chris Peterson	This is a no-brainer, it has bi-partison congressional support which is almost unheard of in this environment today, and the suport of the entire congressional delegation of the State of Florida. So Iurge you to approve the plans for the Everglades Agricultural Area (EAA) Reservoir and move ahead with their construction. This project is essential to the ongoing restoration of America's Everglades and improving the health of the entire Florida ecosystem and the communities that rely on it. It is urgent that it gets approved, there is placeholder language waiting Authorization of the EAA Reservoir in the 2018 WRDA legislation . Quick and timely approvals will avoid an unnecessary and costly two-year delay. The time is now, please act!				x			
William McEwan, in addition to form letter	The residents of Florida need the U S Army's help with this massive restoration project. Raystown Lake, Pa, is one of the A.C.E.'s sterling achievements, and one of their finest accomplishments, a great engineering feat of which the American can proudly boast , and which has not only solved problems of the area, but provided top notch recreation for millions of Americans. Please come on down to Florida, and help us out. Thank You						x	The Corps and the SFWMD are working within our means and applicable laws to restore freshwater flows to the Everglades and reduce flows to the northern estuaries.
Tara Brooks, in addition to form letter	I'm now a grown woman, but spent a great deal of special time with my daddy in the Everglades; fishing, wildlife viewing, airboating, and simply being together. These are all wonderful childhood memories spent in the Everglades. My dad has recently passed, so memories are all that is left for me. I hope you make the decision to proceed with this project, with no delays, so other children can make memories with their families as well. On behalf of myself, and my daddy, Billy, we vote Yes for the below:				x			
Mitchell Roffer	As a recreational angler who is passionate about conserving our wild spaces and fisheries, the Everglades are extremely important to me. I urge you to NOT approve the plans for the Everglades Agricultural Area (EAA) Reservoir and move ahead with their construction. The water must be directed southward without delay. Please open the path between the Lake O and the Everglades immediately.					x	x	The Corps and the SFWMD are working within our means and applicable laws to restore freshwater flows to the Everglades and reduce flows to the northern estuaries.
	When in 1983 my job called for relocating to West Palm Beach county my decision on where I plan to attend the meeting Thursday in Stuart. to move was made in minutes with a quick look at a map. Stuart Florida and the St. Lucie River provided the perfect location for my family's love of sailing, power boating, fishing and kayaking. It was heaven for many years until the Lake O discharges became a common occurrence. First it was poor water quality, now it is algae toxins harmful to humans as well as wildlife. We are now planning to leave Florida. Regarding the South Florida Water Management District's plan below: 23-foot-deep, 10,100-acre reservoir to store up to 78.2 billion gallons of excess lake water; My comment: I did the math and an unfilled 10,100-acre container 23 feet tall has the volume to hold 78 billion gallons of water but how will that be achieved. I have yet to see the water level of any dredged body of water beside the interstate or sand mine more than a few feet below the adjacent land surface so just where is the starting water level for this empty 23 ft. tall container? Just how tall will the surrounding dike be to safely hold this quantity of water? .						x	The proposed plan includes a 37.1 foot levee, to hold approximately 23 acre-feet of water.
	Reduce the number of damaging discharge events from Lake O to the St. Lucie and Caloosahatchee rivers by 63 percent. My comment: Big deal! This is laughable. The result needs to be zero. What person would take "responsibility" for this projection?						x	The proposed reservoir and STA will help reduce the frequency of releases to the estuaries. Although the project will not eliminate releases, it will address ecosystem restoration.

Normal Oleson	Send an average of about 120.6 billion gallons of clean water south to the Everglades. My comment: I continue to wonder why maintaining environmental requirements for "clean" water for the Everglades trumps halting the practice of discharging poor quality fresh water so damaging to our estuaries. Exactly how damaging would it be to occasionally send Lake O discharges directly south?						x	The proposed reservoir and STA will help reduce the frequency of releases to the estuaries. Although the project will not eliminate releases, it will address ecosystem restoration. The Corps of Engineers is sensitive to the environmental concerns and challenges presented by releases from Lake Okeechobee. We take every opportunity to minimize the adverse impacts of potential releases. At the same time, we must manage the lake to ensure public safety. While specific questions about algae are better answered by the Florida Department of Environment Protection, the Corps will coordinate with DEP and other agencies in monitoring information concerning algal blooms. The State of Florida Department of Environmental Protection has been delegated Clean Water Act enforcement and compliance responsibilities by the USEPA. The federal Clean Water Act provides the statutory basis for state water quality standards programs. The regulatory requirements governing these programs (Water Quality Standards Regulation) are published in 40 CFR 131. States are responsible for reviewing, establishing and revising water quality standards. Florida's surface water quality standards system is published in 62-302 (and 62-302.530) of the Florida Administrative Code (F.A.C.). The components of this system include classifications, criteria, including site specific criteria, an anti-degradation policy, and special protection of certain waters (Outstanding Florida Waters).
	Reduce the number of damaging discharge events from Lake O to the St. Lucie and Caloosahatchee rivers by 63 percent. My comment: Big deal!!! There are few discharges that are not damaging. The plan needs to accommodate maintaining safe water level control prior to hurricane season with no discharges into the two rivers except during life threatening hurricanes. During large discharges the St. Lucie and Caloosahatchee Rivers receive a total of more than ?5-6 billion gallons per day which would be reduce the discharges claimed above for only 20 days. During the past few years Lake O discharges into the St. Lucie River have continued for months. We have already exceeded the 20 days this year due to higher than expected rainfall and agriculture back pumping and dumping continues This 65% number is bogus	x					x	Although the project will not eliminate releases, it will address ecosystem restoration. Managing water levels in Lake Okeechobee is outside of the scope of this project.
Eric	Is there a draft proposal for this EIS? Are you looking for public comment before drafting? Further, what is the cut-off date for public comments?						x	The location of the draft EIS was emailed to you in response to this comment. July 24, 2018 was the comment period completion date.
Barbara Birdsey	The Pegasus Foundation has been a staunch supporter of cleaning up the Indian River Lagoon. We are a non-profit organization that focuses on animal welfare and habitat protection. We work nationally and maintain an office in Hobe Sound, FL. We have been very distressed by the lack of progress to stop the Lake Okeechobee discharges into pristine bodies of water on both coasts of Florida. We would like to know the following: What is your proposed game plan for restoring the natural flow of the Kissimmee River to the Florida Bay? That's the question we and all Florida residents need to know. As summer truly begins for local residents, who live, work and play here, we want to know if they will have a summer at all, or will it mirror 2016, when algal Blooms from Lake Okeechobee destroyed our river, lagoon and coastal beaches. We have seen the huge stretches of dark brown gray waters stretching from the lagoon to the horizon of the Atlantic Ocean in our area. What is the status of your participation in CERP (Comprehensive Everglades Restoration Plan)? Where are we in our 35-year timeline of completion? When will the C-44 and C43-Resevoirs be complete? And how much will they even help, with algal blooms growing at a rapid rate in the Lake? Is this our new way of life, sacrificing the health of one community for another? We at the Pegasus Foundation would like to know the answers to all these questions and many more. We know that this manmade disaster, 100 years in the making, is not going to be remedied overnight, but we and all environmental organizations plus all Floridians deserve some CONCRETE answers for the future. When will the Kissimmee River start flowing to the South again? We sincerely thank Brian Mast, Joe Negron for making this issue a priority and others who are speaking on behalf of their communities.						x	The three remaining construction contracts for the Kissimmee River Resotration Project are scheduled to be complete by September 30, 2020.
Gary Ritter	I attended last night's public meeting in Stuart on the EAA Southern Storage Project. During public comment Representative Harrell provided written back up to her comments that included recommendations on the management of Lake Okeechobee water levels. I would like to request a complete copy of her formal written correspondence.						x	A copy of Representative Harrell's comments were provided via email.
Perry Stephens	In the time before man's interference in the movement of water from Lake O, there was never a connection from Lake O to the Caloosahatchee River. Reservoirs must be added to the extent that NO FURTHER FLOW EVER be released into the river.					x		

Carol Stephens	For fifteen years I have lived in SE Cape Coral on a canal that leads to the Caloosahatchee River and the Gulf Beaches of Sanibel and Fort Myers. We purchased a home here to enjoy boating and swimming in the waters of SW Florida.The water quality has gotten progressively worse with each passing year that the Army Corps releases huge amounts of polluted water from Lake Okeechobee into the Caloosahatchee. The water is brown and nasty, there is algae growth, red tide, and dead fish and other marine life. For many months of the year it isn't enjoyable or safe to go in the water. The lack of concern for the affront to our environment in SW Florida is outrageous. Expanding the storage reservoirs south of Lake O should be undertaken and funded as soon as possible as an important step to provide some relief to the continued and avoidable deterioration of our water quality.	x		x	x			
Roger Wood	The dike around Lake Okeechobee is a disaster waiting to happen. It is a design failure that cannot be reversed by adding more dike patches. The ring dike stores storm water 14 to 19 feet above the surrounding communities in a lake that is the second biggest freshwater lake in the nation. What could go wrong with that??? A hurricane could blast an opening in the dike and create a flood of biblical proportions. Tens of thousands will perish, and it's time to weigh their lives against the function of the dike. IRRIGATION! Storm water during the summer monsoon season is drained and back pumped into the lake and stored there. In the winter drought season it is drained into canals to irrigate the huge adjacent agricultural fields. Retaining the polluted storm water from the North, and then constantly recycling it in and out of the agriculture fields has created an ecological nightmare. Lake Okeechobee is now a giant cesspool. The crud released down the Saint Lucie River and the Caloosahatchee River has created green rivers of toxic blue green algae. Huge mats of sea weed are in the Atlantic and red tide has caused massive fish kills in the Gulf. But these effects are nothing compared to the potential loss of lives. The irrigation function of Lake Okeechobee should be abandoned. The ring dike height should be cut in half and made twice as wide so the lake would be for recreational use only. When the big hurricane comes and the loss of life and property is staggering, are the politicians going to step up and say, "Yes, this was all our idea." Or are they going to crucify the officers of the Army Corps of Engineers?	x					x	Thank you for your comment. The Corps and SFWMD are working within our means to restore the Everglades. The Herbert Hoover Dike is expected to complete construction by 2022. Remediation of the HHD will significantly reduce the risk of life loss, economic and environmental damages to the communities surrounding the lake as well as catastrophic impacts to the Everglades.
Nancy Walker	My husband and I are year round residents of Fort Myers Beach. We are enduting an ongoing ecological disaster on the scale of a major oil spill. Large fish such as snook, tarpon, redfish, Goliath groupers and even mammals such as dolphin and manatees are dying. The older fish were spawning. A Goliath has been through possibly 40 years of changing sea conditions. People are getting sick from the nitrogen fed red tides. This must be stopped. This is a totally man made disaster which has been building for the last 10 years. The water in lake O must be rerouted south towards Florida bay which is starving for the water. Now in another effort to hold onto the southern lands a large airport is planned for Clewiston. Last year it was a planned town on the southern land of Lake O. If anyone cares for Florida and the Everglades they must act now. Move the water south now. It may be too late but we must try.	x		x		x		
Pamela Ellis	Yes, Yes, Yes please implement the storage area S of Lake O and send water into the Everglades where it naturally should be flowing! I am 83 and have been in this area since the 1960's and have observed devastating effects to our natural habitat and water quality! I have not felt comfortable to put even a toe into the Gulf of Mexico, much less go swimming in it for the last three years! I see the green algae beginning to collect in the Lagoon at Shell Point Village where I have an apartment. I often suffer breathing difficulties when outside. The releases from Lake O are poisoning our environment, threatening our health, diminishing the tourist industry so vital to SW Florida, killing the fishing industry,and it is vitally important that action be taken immediately!				x	x		
Keith Cherne	please stop releasing toxins that I did not create. When you put them into the Caloosahatchee river they end up in my city, Cape Coral. I did not pollute lake Ochochobbee, yet you poison my water. As a Federal agency you are tasked with protecting the people you serve. Why is there still back pumping going on? How much water has been backpumped into Lake "O" in the last 60 days? I would appreciate answers within 30 days, thank you.	x						An email response was sent with the requested information on July 18, 2018.
Sandy Elhers	ON 2007 MY HUSBAND TOM EHLERS AND I, WHILE TRAVELING AT SEA WITH SENATOR BOB GRAHAM, WORKED FOR FIVE DAYS HELPING SENATOR GRAHAM BETTER UNDERSTAND THAT THE BIG SUGAR RUN SHOULD BECOME A PART OF THE EVERGLADES PROTECTION BILL FOR IT WOULD HELP SAVE FLORIDA'S WATERS AND GULF COAST LINE FROM THE UNCONTROLLED POLLUTION THAT WAS/IS BEING FUNNELED DOWN THE CALOOSAHATCHEE RIVER. TOM AND I WERE PRIVATELY REPRESENTING SANIBEL'S ERUDITE MAYOR CARLA JOHNSTON. ON MAYOR JOHNSTON'S BEHALF WE STRESSED THE IMPORTANCE OF DIRECTING A LARGE PART OF THE POLLUTED WATER TO THE SOUTH . SENATOR GRAHAM QUICKLY UNDERSTOOD THE IMPORTANCE OF BUYING RUN-OFF SOUTHERN PROPERTIES TO ALLOW THE DANGEROUS POLLUTION TO BE MORE FAIRLY DISTRIBUTED. GRAHAM LEAD THE REWORDING OF AN IMPORTANT SECTION IN THE EVERGLADES BILL THAT ALLOWED FOR BETTER RUN OFF LEGISLATION TO BE ENACTED. AFTER THE EVERGLADES BILL WAS SUCCESSFULLY PASSED, ALLOWING FOR THIS PROBLEM TO BE ADDRESSED AND HOPEFULLY CORRECTED A GROUP OF 13 SOUTHWEST FLORIDA MAYORS DECIDED TO REFUSE TO CONTRIBUTE THEIR COMMUNITY'S PART IN REGARDS TO PROVIDING THE FUNDING NEEDED TO PURCHASE THE NECESSARY RUN-OFF LAND. MAYOR JOHNSTON HAD DIED AND SANIBEL'S NEW MAYOR NUMBERED AMONGST THE GROUP OF 13 DISSENTERS. SOME YEARS LATER, I CHALLENGED SANIBEL'S MAYOR AS TO HOW AND WHY HE WAS ABLE TO JUSTIFIED SUCH A DESTRUCTIVE DECISION. HE TOLD ME -- I QUOTE -- "AT THAT TIME WE DID IT WE HADN'T HAD ANY BAD RAINS FOR THREE YEARS." HIS RESPONSE, AND HIS GRASP OF WHAT THE FUTURE HELD IN STORE, WAS IRRATIONAL. I HOLD THESE 13 MAYORS RESPONSIBLE FOR THEIR HEART BREAKING DECISION, WHICH DESTROYED THE POSSIBILITY OF BRINGING BETTER SOLUTION TO A DESPERATELY SERIOUS SITUATION FOR OVER A DECADE. NONE OF THEM DESERVE TO BE RE-ELECTED. PLEASE, PLEASE CORRECT THIS MISDIRECTED, POLITICALLY-MOTIVATED, AND TOTALLY IRRATIONAL MISTAKE. WE ARE DESTROYING OUR MOTHER PLANET.					x	x	Thank you for your comment. The Corps and SFWMD are working within our means to restore the Everglades.
	This Opinion is being provided by Seminole Nation of Oklahoma's Cultural Advisor, pursuant to authority vested by the Seminole Nation of Oklahoma General Council. The Seminole Nation of Oklahoma is an independently Federally-Recognized Indian Nation headquartered in Wewoka, OK.							Thank you for your comments.
	In keeping with the National Environmental Policy Act (NEPA)d, and Section 106 of the National Historic Preservation Act (NHPA), 36 CFR Part 800, this letter is to acknowledge that the Seminole Nation of Oklahoma has received notice of the proposed projects at the above mentioned locations.							Thank you for your comments.

Theodore Isham	Based on the information provided and because the potential for buried cultural resources, the proposed projects have a probability of affecting archaeological resources, some of which may be eligible for listing in the National Register of Historic Places (NRHP), even in previously disturbed land.							Coordination with the tribes is ongoing.
	The Seminole Nation of Oklahoma requests that ALL flora within the affected areas be listed and sent to us, also that considerations of any TCPs be addressed. Mitigation plans will be needed to address any destruction of potential TCP areas concerning traditional medicinal plants within the affected areas. Replanting of affected areas is requested to include a traditionally appropriate consideration.							Flora is listed by county on the Florida Natural Areas Inventory website by county. This was provided via email.
	We do request that if cultural or archeological resource materials are encountered at all activity cease and the Seminole Nation of Oklahoma and other appropriate agencies be contacted immediately. Furthermore, due to the historic presence of our people in the project area, inadvertent discoveries of human remains and related NAGPRA items may occur, even in areas of existing or prior development. Should this occur we request all work cease and the Seminole Nation of Oklahoma and other appropriate agencies be immediately notified.							In compliance with 36 C.F.R. § 800.13(a), the Corps maintains an inadvertent discoveries clause within all CEPP EAA construction specifications. In the event that archaeological resources, including human remains, are uncovered during construction activities, all activities will be halted immediately within the area. Once reported, USACE staff will initiate coordination with the appropriate federal, tribal and state agencies to determine if archaeological investigation is required. Additional work in the area of the discovery will be suspended at the site until all federal and state regulations have been successfully completed and USACE staff members provide further directive.
Henry Sostman	I was delighted to see that the Office of Management and Budget (OMB) approved the Everglades Reservoir project, so it can be included in the 2018 Federal water bill, (WRDA) bill for authorization. This is a critical project that will create a new outlet from the Lake to send water south reducing estuary discharges by 40 - 60% and providing needed water supply for the Everglades and Florida Bay. This will be good for Florida's coastal communities and the State economy, not to mention the environment. I support this project wit high enthusiasm.				x			
Tara Biber	The right thing to do, is to fight for the environment, always. Obviously, you are aware of the terrible things that are happening to our wildlife, waterways and humans because of manmade canals that dump water from Lake Okeechobee where it should have never gone in the first place. Now is the time to turn the beat around!! If we keep doing the wrong things and turning blind eyes, things will continue to get worse and we will lose our precious environment and special natural resources that we so enjoy. I have a two-year-old daughter who cannot go in the water down the street from our home. It is quite depressing. AND we can't even go for a leisurely stroll with ice cream on the docks downtown because of the toxic algae. Enough is enough! This whole situation has gotten so out of hand that it is time to act and send the water south! It is bad enough to have to worry about the runoff that effects the environment, but Lake O has just got to GO! Build the reservoir and send the water SOUTH! I am hopeful and optimistic that you will do the right thing and make this happen so that we can have our waterways back and be able to breathe (clean air) again. A very concerned mom,	x			x	x		
Jim Wawrz	To spend a billion $ on a new reservoir south of Lake O and only send 360K acre-ft of water to each year does not seem cost effective. 360K acre-ft is only 9.3 inches of Lake O water. Why not lower Lake O average water level by 10 inches and you have room to keep the 360K of water there and release it south to a new STA for cleaning and releasing to Everglades. Lake O is the most effective place to store water. It's better to use land for STA's rather for reservoirs. Lake I should be treated as a 'reservoir' and not a Lake. Lake O levels around 10 to 12 ft allow for bottom grasses to grow which provides water cleaning action.	x					x	Lake Okeechobee levels are managed through the Lake Okeechobee Regulations Schedule.
Ellen Decker	The situation is urgent. Millions of people living on the coast of SWFL can not leave their homes without coughing fits. Doctors offices are full. Studies available on MOTE and FWC websites prove that the Phosphorus (P) and Nitrogen (N) cause the known Gulf Karenia brevis Red Tide to grow!!! It is being sent down the Caloosahatcee. The growth of the known K. brevis Red Tide from that P and N is made worse by the bacteria. A study from the U. of Maryland confirms that it assists in the salinity exchange. My husband is a Pediatrician. We have contacted the CDC. Health issues have been seen as far north as Venice and as far inland as 2 miles in Englewood. The massive fish (a healthy food) kills at Boca Grande, Don Pedro, and Manasota Key come within 24 hours of a release from Lake Okeechobee. This includes killing endangered species Loggerhead Turtle and Manatee. My primary concern is for the kids. We can't keep every child that visits out of the water at public beaches and out of the estuaries. We are hearing of skin rashes and skin infections, ear infections, urinary tract infections and massive coughing fits even from normally healthy kids. Please hurry to get the Caloosahatchee situation resolved!!!	x		x				
Iris Ramire	South Florida's recreational waters are in a crisis and we need your help to change the outcome. There are approximately 484,000 acres of crop land in the EAA. This number excludes the cities, preserve lands, STAs and WCAs. For context this crop land acreage is larger than the 470,000 acre surface of Lake Okeechobee. Yet these lands are afforded flood control and allowed to discharge their own excess water off their property shifting the harm to the Lake and estuaries. This has to stop. When there is land for excess water to be moved to, it must be done to stop shifting the harm to our state's economic engines, our coastal communities. We ask you to use the operational flexibility under the Emergency order to move the harmful discharges of excess water south instead of to our two coastal estuaries. NOW.					x	x	The Corps and SFWMD are working within respective authorities to try to reduce freshwater releases to the estuaries while restoring Everglades National Park.

John and Lori Turner and Becky Sterling	Dear Governor, Water Managers, and Congress:There are approximately 484,000 acres of crop land in the EAA. South Florida's recreational waters are in a crisis and we need your help to change the outcome. This number excludes the cities, preserve lands, STAs and WCAs. For context this crop land acreage is larger than the 470,000 acre surface of Lake Okeechobee. Yet these lands are afforded flood control and allowed to discharge their own excess water off their property shifting the harm to the Lake and estuaries. This has to stop. When there is land for excess water to be moved to, it must be done to stop shifting the harm to our state's economic engines, our coastal communities. We ask you to use the operational flexibility under the Emergency order to move the harmful discharges of excess water south instead of to our two coastal estuaries. NOW.					x	x	See comment above.
Elaine Pechilis	Please. The devastation must be stopped. Flood the ag fields. ENOUGH	x						Thank you for your comment. The Corps and SFWMD are working within our means to restore the Everglades.
Greg Braun	Please accept these comments on the Draft Environmental Impact Statement for the EAA reservoir that are being provided on behalf of the Guardians of Martin County, a non-profit organization focused on Growth Management and Environmental Sustainability. While we strongly support that the EAA reservoir is our best currently available option to substantially reduce harmful discharges from Lake Okeechobee to the St Lucie and Caloosahatchee Rivers and Estuaries, we share concerns voiced by others that the reservoir has been so undersized as a result of a politicized process that it may not be effective in preventing damage to these resources. If this option is pursued, we request that the EIS be amended to ensure that adequate monitoring is conducted and that corrective measures (e.g. additional storage & STA acreage) will be undertaken if completion of the project does not adequately protect Everglades National Park, the St Lucie and Caloosahatchee Rivers and Estuaries, and the Indian River Lagoon.		x					Monitoring of the reservoir and STA is addressed in the Adaptive Management and Monitoring Plan (Annex A to the Final EIS - SFWMD Report, Annex D - Adaptive Management and Monitoring Plan for the Central Everglades Planning Project Post Authorization Change Report (CEPP PACR)).
Roseline Young	PLEASE PLEASE PLEASE stop the harm to our estuaries while agricultural crop lands are afforded complete flood control, exacerbating the problem. Why are coastal communities asked to shoulder the harm alone especially when AG lands are protected from any such losses? We want new actions for better outcomes! STOP THE DISCHARGES into the Caloosahatchee & St. Lucie PLEASE PLEASE PLEASE send the water south into the everglades!!! You are killing us!	x						
I support the Everglades Agricultural Area Reservoir Form Email -1095 commentors	I am writing to express my strong support for the swift advancement of the Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area. There is an obvious and urgent need for construction of this project, which will reduce the damaging discharges from Lake Okeechobee that cause devastating algal outbreaks in the Caloosahatchee and St. Lucie estuaries. Simultaneously, the project will help to store and send more water south to the central Everglades and Florida Bay, where it is desperately needed. It is imperative that the final EAA reservoir project meet water quality requirements in order to achieve the goals of Everglades restoration for both people and wildlife. I appreciate the State of Florida's commitment to achieving water quality requirements as well as the Army Corps' attention to this concern in the Draft EIS. Thank you for your consideration and support.				x			
David Dinan - in addition to "I Support" form letter	Florida has wonderful beaches and an amazing ecosystem in the Everglades. Both are a national treasure that must be protected and preserved. It is imperative that is be brought closer to its natural state by restoring proper flow of clean water as nature intended. Advancing this clean water project could do that.				x			
Sue Dauber - In addition to "I Support" form letter	Simultaneously, the project will help to store and send more water south to the central Everglades and Florida Bay, where it is desperately needed.				x			
Diana Cowans - in addition to "I support" form letter	The Everglades is a national trasure but its health is also critical to our health and life in southern Florida. We are the stewards of this planet and are, or should be, responsbile for maintaining the health of our environment. Sound science and common sense tell us that these water quality requirements must be met.				x			
Steven Sleeper - in addition to "I support"	We have to stop murdering our planet. We have no where else to go! ….DO THIS!				x			
in addition to "I support"	COME ON, PEOPLE, LET'S PROTECT FLORIDA, ITS ENVIRONMENT AND ITS WILDLIFE!!! AT SOME POINT WE MUST HAVE SOME EMPATHY FOR WILDLIFE!!!				x			
Hewlett Appelbaum - in addition to "I support"	I live in Vero Beach, Florida, I and see every day the damage the algae-causing water from Lake O is doing to our state.	x						
Andrea Sweeney in addition to "I support"	Please take heed to the public's demand to repair the man made damage to the Everglades while it is still possible. We must be better stewards of this country's resources and the time to do it is now.				x			
Deborah London in addition to "I support"	We must do ALL WE CAN to protect our water supplies!				x			
Marsha Schaub - in addition to "I support"	This is my home, I live and where I get my water. Please protect it!				x			

Mary Mobley - in addition to "I support"	Please do your job for the other 98%!				x			
Danielle A Reid - in addition to "I support"	I moved to Florida from Jersey for a reason….PLEASE!! You MUST PROTECT THE EVERGLADES!!				x			
Greg Rosenwald - in addition to "I support"	...Please! Theres no point in living in Florida if we can't enjoy the water!!!!!!!!				x			
Edward Du Bosq - in addition to "I support"	I have heard about Fixing the water quality of the Everglades during your lifetime and the lifetime of my sons and grandchildren. It's time to finish it. Stop causing algae bloom up state and send that water to the Everglades.	x			x			
Marie Louise Morandi Long Zwicker - in addition to "I support"	I lived in Florida for over 35 years before moving away. I am still connected to Florida by my love for what was once her beautiful environment.				x			
Sarah Bachar - in addition to "I support"	PLEASE DO THE RIGHT THING!!!!!!! ALLLLLLLLLL KINDS OF SPECIEA ARE DYING!!!!!!!!!!!!!!!!!! CRITICAL SPECIES ENDANGERED SPECIES KEYSTONE SPECIES DO THE RIGHT THING!!!!!!!!!!	x			x			
Thomas Blazier - in addition to "I support"	Because Fidel Castro believed in freedom of religon and workers rights the environmental disaster that is the Everglades was created. The Christian concept you are to live a miserable short life serve your master and never question authority. The religious Kleptocrats with the help of the Army Corp have dammed the fresh water to the Everglades to support criminal big sugar. So now the everglades is subsiding becoming saline. Nixon's racist pact with Strom Thurmond for Nixon's part he appointed Nazi Justice Lewis Powell in him memorandum the criminal actives of corporations need protection. Big sugar can dump any toxin in the environment it is the Christian capitalist thing to do and all republicans are whores for them.				x			
Kirsten Knowles - in addition to "I support"	The algal outbreaks are gross - they smell and discolor the water. Not only is it dangerous for wildlife, but it makes the beaches unappealing to people. That affects our tourist dollars.	x						
Margie Wagner - in addition to "I support"	Residents of S, Florida are "sick" and tired of the green slime.	x						
Addison Austin	Do we really want that green slime water going to the Everglades and causing no end of problems? I don't think I do !	x						
Ryan Coxey	As a long time resident of South West Florida, I wanted to voice my opinion on the EAA Reservoir Project. The Herbert Hoover Dyke is causing all kinds of havoc this year and has been getting worse over the years. We need to restore the natural processes of the everglades to help filter the lake Okeechobee pollutants before they enter our coastal estuaries. In my opinion it is absolutely crucial that the Army Corps of Engineers invest in pursuing the EAA Reservoir before any substantial updates go into the dyke itself. The Comprehensive Everglades Restoration Plan is absolutely crucial in repairing the problems the generations before us caused and profited off of. We are suffering out here and the wildlife seems to die off more every year. This year because of algae blooms dolphins, manatees and whale sharks are all washing up along our beaches. These are processes that need to be addressed now if we hope to restore the biology in the area to its once beautiful state. The toxic air is so bad, people can't breathe along our beaches and as a result our local economies are suffering. As I write this email, I find it hard to breath in my own living room due to toxic fumes not just in the water, but in the air as well. We can’t swim in the water, we cant breath, all the fish and marine life is dying and a lot of the none marine life with it –is any of this worth the gains of sugar cropping? Diverting the water south as it natural flowed will affect people in certain communities – I understand that. But it’s crucial we act now to find and execute a solution. Okeechobee was never meant to drain like it does now, and all of south Florida is suffering because of humanities arrogance in assuming we could control it. I‘m not sure what I can do, but if you need any help in any way in promoting this agenda, please let me know.	x		x	x			
Elizabeth Jolin - Florida Bay Forever	As an organization representing the concerned citizens of Monroe County, we are in full support of expedient forward movement on the EAA Reservoir. After the massive seagrass die-off of 2015, we witnessed a devastating change in the Florida Bay. Masses of grass and green algae blooms degraded the pristine quality of our estuary. We were reminded, again, of the fragility of our natural resource and the effort we all must make to preserve it. We applaud the work that has been done by our political leaders and the agencies tasked with carrying out the planning of the EAA Reservoir, but now must urge the continued effort to include the reservoir in the water resource bill in order to continue the momentum of moving toward Everglades Restoration. Thank you for your work.				x			
	I am responding as a private citizen regarding public comment to the Draft environmental Impact Statement for the USGS EAA project. Firstly, I greatly support the project and look forward to improved water quality in the Caloosahatchee River, St. Lucie River, and our State. I’d like to bring up a few points to consider in the project planning.				x			

Jessica Blanks	1. The project design to send more water south must detail how the water is properly treated. With the reservoirs available, the water level in he reservoirs needs to be maintained at lower levels so that in the event of large rain events, the discharge can go straight to the reservoirs. 2. The treatment in reservoirs should be regimented to ensure any discharge south meets state compliance standards or the Everglades and the Florida Bay will only experience the same problems as the Caloosahatchee and St. Lucie Rivers. Species diversity is already in a slight decline in the Florida Bay. Please use a marker study before releasing treated water. Compare time-based data to the baseline. Additional key indicator species will be beneficial in reviewing if water quality declines after sending the water south. For example, the apple snail is an indicator of clean water and typically wet conditions. If there is marked decline in the apple snail population, after adding more water to southern Florida, then there is a clear indicator something is wrong with the water. 3. The baseline flows needed for both Caloosahatchee and St. Lucie Rivers must be maintained to ensure proper water quality, water mixing, and prevent too high of salinity up the rivers. The baseline flows should be achieved above all other water allocations indicates in the EAA project. I support a Calusa Waterkeepers statement by John Cassini in that 600 cfs is needed at salinity meter station S.79 in the Caloosahatchee River to maintain salinity of 10 psu. Station 79 is the upstream water control station near Franklin Locks and north of Orange River input. The Minimum Flow Level for Caloosahatchee should be better evaluated and should not be set at 450 cfs. 4. Include a full consistency review by the agency administering the Coastal Zone Management Act on a yearly basis. This would also include an annual panel meeting to review project status and monitoring reports. The panel should include all relevant agencies, public, and private stakeholders. The project should allow for flexibility in varied water treatment options as well as flow release volume and timing options after review by full stakeholder panel. I'd like to see more collaboration with NOAA.	x						
	5. Provide support to local and state agencies regarding water quality input to and BMP's acorss the bulk of the watershed. The cost to treat the water released from the southern treatment reservoir will be reduced if the levels of pollution and excess nutrient loads into Lake Okeechobee are controlled and reduced at point of input as well as treatment in situ. Support to include 1) assist septic studies and conversion to sewer if necessary, 2) limiting agricultural nutrient application and type of compounds used, including implementing higher fertilizer taxes, 3) tighter controls on FDACS fertilizer application licenses under a single business who allow for multiple operators and ensure each operator has a separate license with training and require all equipment to be licensed; unlicensed equipment could be fined by local ordinances to assist with overwhelmed FDACS enforcement, 4) pursue ordinance issuance of required riparian buffers in municipalities with properties reaching Lake Okeechobee shorelines, 5) support to existing monitoring of lake and river inputs of NPDES permitted discharges, and 6) provide assistance in studying effect of river discharge during/after high rain events, high heat, red tide, and marine animal deaths. 6. Lastly, please share data with the public over course of project and all monitoring events. Consider creating an easy to use library for all state and federal reports related to water quality associated with this project and similar minded projects for Lake Okeechobee and the combined watersheds. It's imperative that the public understands what is happening, yet can understand the reports provided and have a centralized site to review such reports. I am just a concerned citizen that understands we all have a responsibility to protect our own environment, yet we rely on our governing bodies to make the right decisions regarding welfare of state. Please consider that we all have rights to use state water bodies for their designated uses which includes marine mammal watching, swimming, fishing, boating, and more. Those that are causing more detriment to our state should be held more accountable at a higher rate of fines, fees, or taxation. Thank you for your efforts and please reach out regarding any clarifications you seek. I can provide references for species diversity, the apple snail, and other points if requested.	x						
Rachel S. Walter and Alex R. Ortiz - ESCI	We are writing on behalf of the Ecological Sciences Communication Initiative, a nonprofit organization committed to transparent coverage of environmental issues. We are submitting this as a comment regarding the EAA Reservoir Plan.. We are writing to express our support for the R360D alternative as it includes holistic consideration towards the preservation of STAs and efficient use of space on the A-1 parcel needed to effectively treat water flowing from Lake Okeechobee to the Everglades, a place whose biodiversity is something Florida cannot afford to lose. In this implementation process, we encourage and respectfully request that the District to personally reach out and address the concerns of the communities surrounding the reservoir region before action is taken. Moreover, while we are supporting implementation of R360D, we are also more generally in support of the EAA reservoir so long as the future of the Everglades is a consistent point of discussion before selecting a plan to move forward. We also appreciate the thoroughness of the 404(b)(1) analysis, and agree that the project will likely benefit all marine life in the area insofar as the STAs remain highly functional, going back to our advocacy of our preferred alternative R360D. We sincerely thank the Army Corps of Engineers and the South Florida Water Management District in being timely and holistic in the approach of executing a solution to resolve the harmful effects of nutrient pollution in Lake Okeechobee.				x			
	The draft EIS needs to include recognition of the presence and value of the night sky resource (nightscape) within and vicinity of this project and provide recommendations on how this resource will be protected to minimize site impacts and avoid cumulative impacts. In NEPA EIS documents by other federal agencies, including the National Park Service, this resource tends to be discussed in a Visual Resources section. Also, due to the broad range of impacts associated with light pollution, it also typically addressed in Wildlife and Aesthetics sections within EIS documents. It can also be addressed in sections that refer to Cumulative Impacts as lighting at project site could further aggravate any existing light pollution issues from other places (e.g. skyglow).						x	The night sky will be discussed in the Aesthetics section as requested.
	The footprint of the proposed project is within an area of South Florida that enjoys some of the last remaining naturally dark night skies in all of Florida. This resource is essential to wildlife in the Everglades ecosystem, including many migratory species that make stops at its water bodies, wetlands, uplands, wildlife management areas and even at surface water treatment areas. This resource also provides recreational opportunities for night sky enthusiasts, photographers, nocturnal wildlife observers, scientists, including amateur astronomers. Because of the quality of the night sky in the EAA region, several public lands managed by SFWMD, FWC and other agencies are also eligible to apply for International Dark-Sky Place designation. (see http://www.darksky.org/idsp/parks/)						x	The Corps will follow all guidelines for construction and permanent operations in regards to light pollution. For reference, permanent facilities are envisioned similar to those at the southern end of the A-1FEB (e.g. G-370).

Diana Umpierre, AICP, GISP, Vice President International Dark Sky Association	Our IDA-FL Chapter has presented a couple of times at SFWMD meetings on the value of the night sky over SFWMD public lands, the importance for the agency to take measures that help protect it and to provide recreational access to that resource to the general public. Below is a URL of the March 2018 presentation that IDA-FL did at SFMWD that explains in further details the value of this resource along with recommendations for its protection. Slide 12 is a good example of a really bad implementation of lighting in public lands within the SFWMD region and illustrates why this issue should NOT be ignored in the EIS.					x	The Corps will follow all guidelines for construction and permanent operations in regards to light pollution. For reference, permanent facilities are envisioned similar to those at the southern end of the A-1FEB (e.g. G-370).
	https://apps.sfwmd.gov/webapps/publicMeetings/viewFile/13202					x	Thank you for the link.
	Therefore, **during design (and even during construction), we ask that artificial lighting impacts be both avoided and minimized. We recommend any lighting infrastructure, when needed, follows the recommendations for wildlife/ ecological friendly lighting by FL FWC, USFWS, US NPS and IDA, to ensure this natural resource is not degraded.** To that end, even O&M documents should address this resource to avoid impacts during operation and management operations of any facility associated with this project. Below are links to information to help address this important natural resource.					x	The Corps will follow all guidelines for construction and permanent operations in regards to light pollution. For reference, permanent facilities are envisioned similar to those at the southern end of the A-1FEB (e.g. G-370).
	http://myfwc.com/conservation/you-conserve/lighting/					x	Thank you for the link.
	https://www.nps.gov/subjects/nightskies/practices.htm					x	Thank you for the link.
	https://www.researchgate.net/publication/305720851_Artificial_night_lighting_and_protected_lands_ecological_effects_and_management_approaches					x	Thank you for the link.
	In section 3.5.1 of the draft EIS (Recreational Features of the Preferred Alternative), please modify the following sentence to include stargazing and photography: "The activities that would be permitted in the project area (bicycle riding, horse-back riding, nature study, wildlife viewing, walking/hiking, boating, canoeing/kayaking, sailing, fishing, and hunting) are all well-suited to the environmental purposes of the project." We also ask that recreational facilities be added, and/or already planned facilities be modified, for stargazing and nocturnal wildlife enjoyment.					x	Stargazing will be added to the referenced section as a recreational activity.
	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).	x	x		x			
	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.		x					
	During wet years, the vast volumes of water sent south into the St. Lucie and Caloosahatchie estuaries will continue.		x					
	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.						x	The Corps follows the NEPA process and the USACE Planning Process in order to disseminate information as necessary when there are new or changed projects and information.
	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.		x					
	On the other land – 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.						x	The project purpose is listed within the EIS.

Matthew Schwartz Executive Director South Florida Wildlands Association	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.						x	The Recommended Plan includes conveyance improvements along the Miami Canal (1000 cfs) and NNR Canal (200 cfs) and an additional inflow 4600 cfs pump station (P-1) for the A-2 Reservoir. The EAA conveyance canals will continue to be managed within the operational ranges prescribed within the governing Water Control Plan for Lake Okeechobee and the EAA. The Project Operating Manual will be updated at periodic intervals during the detailed design, construction and operational testing and monitoring phases of the project. Refinements to the operating criteria in the POM will be made as more project design details, data, operational experience, and general information are gained during these project phases. Additional evaluations for the Savings Clause will be conducted during PED, if warranted due to design or operational changes, or changes resultant from other operational studies.
	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.							Applicable water quality standards would be met prior to sending water south to the Everglades.
	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.							Thank you for your comment.
	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 forthe 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.						x	This project is proposed to contribute to and help restore the Everglades.
	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.						x	Land acquisition for the CEPP PACR effort undertaken by the SFWMD was restricted in the State of Florida's Senate Bill 10 language to utilize existing State owned land and land from willing sellers. The A-2 STA and A-2 Reservoir footprint was configured based on the Senate Bill 10 direction. Alternatives were developed and analyzed as detailed in the Final EIS Chapter 4.
	This letter is written on behalf of the Sanibel Captiva Conservation Foundation in support of the South Florida Water Management Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area project. We appreciate the opportunity to comment and applaud the federal and state expedited review of this critical Comprehensive Everglades Restoration Plan (CERP) project which we have been actively engaged in during the entire planning process.						x	Thank you for your comments.
Rae Ann Wessel, Policy Director Sanibel Captiva Conservation Foundation	The hydrological benefits of this project are fundamental and significant to advancing Everglades restoration goals of reducing harmful, excess discharges to the Caloosahatchee and St Lucie estuaries and increasing freshwater flows to the southern Everglades. This one project will provide more than any other single or group of projects to reduce harmful flows to the estuaries.				x			
	The Caloosahatchee estuary experiences harm from both excessively high flows as well as insufficient flows in the dry season and droughts. While the EAA reservoir project is critical to provide relief to the Caloosahatchee from harmful high flows, the river and estuary depend on dry season flows from Lake Okeechobee to manage a low salinity zone in the upper estuary downstream of the WP Franklin Lock and dam, S-79. Unfortunately the evaluation for the level of dry season flows and the habitat unit analysis are based on incorrect and inadequate SFWMD MFL and RECOVER performance measures that we have documented do not support the reported outcomes. We continue to oppose these standards and would ask that this issue be revisited to correct documentable outcomes.	x					x	We understand your concern. The Caloosahatchee MFL is outside the purview of the CEPPFederal project and the although the project will help reduce freshwater discharges to the Caloosahatchee Estuary.
	We would like to underscore the importance of ensuring that the benefits of this project go hand-in-hand with the State's commitment of achieving long-term water quality goals in the Everglades. To that end, we urge the Corps to incorporate the State's representation that it will expand or modify the project if necessary to meet water quality standards while maintaining project benefits into the Project approvals.							Additional analysis for water quality has been completed and the project footprint is not expected to change. The project will meet all applicable water quality standards.

	Finally, we agree with the Corps' conclusion that, "CERP identifies capacity for 360,000 acres of storage south. We disagree with the SFWMD report that suggests the EAA Reservoir and STA would be considered the final, not incremental, implementation of components of the CERP Everglades Agricultural Area Reservoirs (Component G of CERP).						x	Thank you for your comments.
	We appreciate the opportunity to comment and applaud the federal and state expedited review to move this project forward and stand ready to continue to participate in the process as it moves forward to reality.				x			
	The Florida Oceanographic Society appreciates the opportunity to comment on the *South Florida Water Management District Section 203 Everglades Agricultural Area (EAA) Southern Reservoir and Stormwater Treatment A* rea *Draft Environmental Impact Statement (EIS) dated June 2018* . The EAA Storage Reservoir project is an integral component of the Comprehensive Everglades Restoration Plan (CERP) and is on the Integrated Delivery Schedule 2016 Update.				x			
	The original CERP 2000 called for a 360,000 acre-foot storage reservoir on 60,000 acres of land in the EAA using existing STAs. This was modified to a 360,000 acre-foot reservoir on the Talisman purchase reduced down to 31,000 acres (A-1 & A-2 components). In the SFWMD Section 203 Report six alternative configurations were evaluated with only 2 at the 360,000 acre-feet of storage. The SFWMD Section 203 Preferred Alternative (C240A) Recommended Plan outlines a 240,000 ac-ft reservoir on 10,500 acres of the A-2 property, with a depth of 23 feet. We feel this reservoir configuration depth will be extremely costly and may cause additional major environmental water quality issues. We believe the state lands in the EAA should be utilized to store, treat and convey water from Lake Okeechobee south to the Water Conservation Areas (WCAs), the Everglades and Florida Bay and that the EAA should be responsible to store and treat the EAA basin runoff before allowed to go south. The A-1 & A-2 should be used for storage at 12 feet depth and the adjacent state-owned STAs should all be used to treat Lake Okeechobee water going south.						x	Thank you for your comment. The SFWMD Section 203 Report analyzed several alternatives and configurations to determine which alternative would best meet the project needs in a cost effective manner. The 240,000 ac-ft Reservoir configuration with a 6,500 acre STA met the goals and objectives of the project and met the CERP goals for sending restoration flows south into the Everglades Protection Area.
	The Draft EIS states that in combination with previously authorized CERP projects, the Recommended Plan approaches the CERP goal of approximately 80% reduction in damaging discharges to the Northern Estuaries by providing 55% reduction in discharge volumes to the Northern Estuaries from Lake Okeechobee (ES-7). Although this seems significant in reducing harmful discharges to the Caloosahatchee and St. Lucie estuaries it more beneficial at increasing freshwater flows to the central and southern Everglades.							Thank you for your comment.
	In Section 3.5 the Recommended Plan C240A alternative project features describe the storage reservoir, STA and conveyance improvements. The conveyance improvements to the Miami and North New River (NNR) Canals are indicated at 1,200 cfs. It is not clear if this is new or in addition to the existing conveyance capacity of the canals and the conveyance capacity of the structures connecting the canals to Lake Okeechobee. Currently the maximum flow capacity of the S-354 structure connecting the Lake to the Miami Canal is 1,450 cfs and the S-351 connecting the Lake to the NNR canal is 1,500 cfs. These structures should be modified to a much larger capacity, closer to that of S-308 and S-77 (7,300 and 9,300 cfs) so water can be adequately conveyed out of the Lake south to the EAA storage project.						x	The CEPP PACR recommended plan includes 1,000 cfs of additional conveyance capacity in the Miami Canal within the EAA and 200 cfs of additional conveyance capacity in the North New River Canal within the EAA. The additional canal capacity will provide the flows necessary for the project. This project does not include additional capacity at the outlet structures S-354 and S-351.
Mark D. Perry Executive Director Florida Oceanographic Society	Also the Canal capacities are currently underutilized and can be maximized through operations. The existing Lake Okeechobee Regulation Schedule (LORS 2008) calls for the Miami and NNR Canals to be operated at the "Optimum Levels" of 11.5 ft – 12.0 ft. NGVD (Table 7-1-LORS 2008). These Canals are kept near an elevation of 10.0 to 10.5 ft so clearly they have more capacity even in the current state without improvements. For the Recommended Plan project improvements should be made in both the structures and canals to provide adequate conveyance of water. It is also unclear in Section 3.5 what size the inflow pump will be for the Reservoir, 4,500 cfs ?, larger?. And it is unclear what "Multi-purpose project operations" would be.						x	Canal conveyance improvements and pump station capacity in the Final EIS are at a conceptual level of design. The scope of canal improvements and pump station capacity will be determined during detailed design (PED). The multi-purpose operations are meant to provide water for environmental benefits and other water-related needs such as water supply. Water supply to the basins could come from water stored in the A-2 Reservoir at such times when additional capacities are available beyond those identified for restoration flows ot the Everglades. Water supply conditions for the A-2 Reservoir are described in Annex C Draft Project Operating Manual of the CEPP PACR.
	Overall we ask that the above comments be taken into consideration during the Pre-Construction Engineering and Design (PED Phase of this project. Also we ask that the project should have an adequate Water Control Plan to operate this project in conjunction with other CERP and non-CERP projects so the maximum benefits can be achieved for the original intent of the Comprehensive Everglades Restoration Plan.						x	The existing CEPP project operating manual will be updated during the PED phase of the project. This EIS does not address any changes in the Lake Okeechobee Regulation Schedule.
	Our support of this project is based upon the State's representation that the identified project benefits will be fully achieved while meeting the WQBEL and that if necessary, the project will be modified or expanded to meet the necessary water quality satandard without any reduction of project benefits. As noted on page 4-13 of the EIS, we urge the COrps and SFMWD to utilize conservative estimates in modeling STA and reervoir water quality performance and to disallow untrated water to bypass the STA's. We further urge the Corps to incorporate the State's representation that it will expand or modify the projet if necessary to meet water quality standards while maintaining project benefits inot the Project approvals. Additionally, the SFWMD Section 203 Report suggests that the Southern EAA reservroir and STA would be considered the final, not incremental, implementation of componenets of the CERP Everglades Agricultural Area Reservoirs. We agree with the Corps's conclusion that, "CERP identifies capacity for 360,000 acres of storage south of Lake Okeechobee, for Component G. Considering anything short of 360,000 acre storage option a final action could limit achievement of CERP goals related to Component G." (EIS at 3-4). We also note the Corps' statement in the EIS that Senate Bill 10 "explicitly mandated that the SFWMD to utilize publicly-ownded lands". This statement is incorrect and should be corrected as SB10 did not limit the state to utilizing exclusively publicly owned lands but rather mandated the SFWMD to identify the "Optimal configuration" of the project.				x			

If your comment has an "x" in columns E, F, G, H, or I, please see the corresponding word document for a response. This project had many similar comment themes, and therefore, the responses are located in a word document. Column J is "other" and a response is located in Column K, Additional Response.

Commenter		Comments	Polluting estuaries, water quality concerns	Solution too small	Solution takes too long/Immediate action needed to clean water and/or stop releases	Support	Stop sending water to estuaries, send south to Everglades	Other	Additional Response
Patrick Dayan, P.E. St. Lucie Water Quality Division		St. Lucie County wishes to express support for the effort to reduce the catastrophic damage as a result of freshwater releases to the St. Lucie Estuary. The South Florida Water Management District claims the EAA Reservoir project will — when used in conjunction with other existing and planned projects — reduce the number of damaging discharge events from Lake Okeechobee to the St. Lucie and Caloosahatchee rivers by 63 percent and increase the flow going south by 76% by 160,000 acre-ft./year to 370,000 acre-ft./year (121 billion gallons per year) of water south to the Everglades and Florida Bay from Lake Okeechobee. The preferred alternative, C240A, will include a 10,500-acre 23 foot deep water reservoir area and a 6,500-acre STA to be constructed on state-owned lands. The County has concerns that the 6,500-acre STA is insufficient to provide the water quality needed to remove pollutants, particularly phosphorus and nitrogen, to the level required (10ppb TP) for release into tribal lands or the Everglades National Park. If the water cannot be cleansed to the point of release, the reservoir will cease to be effective. Once the available volume is filled, no additional storage will be available and the situation will mimic the current condition in that the discharges to the Northern Estuaries will be the resulting alternative. We would recommend that additional shallow vegetated wetland areas be considered to provide the necessary water quality treatment component of the plan.		x					Your recommendation for additional STA is noted, however, analyses have shown that the treatment capacity of the proposed STA is sufficient and appropriate to meet applicable outlfow water quality standards. Additional modeling and analysis will occur during PED to ensure appropriate water treatment will occur prior to releasing the water into the Everglades.
U.S. Department of Interior		The US Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement for the Central Everglades Planning Project - SFWMD Section 203 EAA Southern Reservoir and STA - Florida. We have no comments at this time.		-				x	Thank you for your response to the project.
Carol J. Monell, Acting Director Resource Conservation and Restoration Division U.S. Environmental Protection Agency		The U.S. Environmental Protection Agency has reviewed the above references document in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) or the National Environmental Policy Act (NEPA). The purpose of the DEIS is for the US Army Corps of Engineers (USACE) to evaluate the impacts associated with the proposed restoration project that is described in the South Florida Water Management District (SFWMD) Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area ('EAA Reservoir DEIS'). The EPA notes that SFWMD's tentatively selected plan (TSP) would make modifications to the previously Congressionally-authorized Central Everglades Planning Project (CEPP) The SFWMD prepared a feasibility study and environmental study action required by the USACE was to evaluate and report whether the project is feasible and provide any committees. In a letter dated May 30, 2018, Mr. R.D. James, the Assistant Secretary of the Army for Civil Works, made the determination that the project was feasible and that the USACE's Review Assessment was submitted to the Office of Management and Budget for clearance to submit to Congress. The EPA provided technical comments for the CEPP DEIS on December 2, 2013, and the FEIS on October 6, 2014. The EPA provided scoping comments for the EAA Reservoir DEIS to the SFWMD on November 21, 2017, and to the USACE on April 30, 2018. Additionally, the EPA staff attended numerous public meetings and agency coordination meetings for the proposed restoration project. As stated in the DEIS's cover sheet, the purpose of the project was "to improve the quantity, quality, timing and distribution of water flows tot he 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." The SFWMD identified 6 alternatives in their environmental documentation and compared these alternatives to the 'No Action' alternative, which was the original Congressionally authorized CEPP. The SFWMD identified Alternative C240A as the recommended plan and the environmentally-preferred plan. The USACE states that the Alternative C240A includes a 240,000 ac-ft. above ground reservoir and a 6,500-acre Storage Treatment Area (STA) that would work in conjunction with the existing 60,000 ac-ft. A-1 Flow Equalization Basin (FB), STA-2, and STA-3/4 to reduce nutrient levels in the freshwater so that it could be transferred into the Everglades. The USACE also states in the DEIS that the TSP would increase flows to the greater Everglades. The EPA notes that the Everglades' STAs have a National Pollutant Discharge Elimination System Permit and an Everglades Forever Act Permit issued by the Florida Department of Environmental Protection (FDEP). These permits require that the STA discharges meet a Water Quality Based Effluent Limit (WQBEL) for phosphorus of 13 parts per billion (ppb) long-term average. SFWMD performed water quality modeling, and they concluded that based on the modeling, the Recommended Plan would discharge at the WQBEL. In March of 2018, the Secretary of the FDEP issued Executive Order DEP #18-0054 regarding the EAA reservoir which states: "that regardless of the modeling predictions, existing permit conditions ultimately require attainment with the WQBEL" and "in the event the WQBEL is not attained, additional actions to meet water quality requirements must be undertaken." The EPA encourages the USACE, as the government agency charges with tribal consultation under Executive Order No. 13175. "Consultation and Coordination with Indian Tribal Governments" (Nov. 6, 2000, to conduct tribal consultation with the Miccosukee Tribe of Indians of Florida and the Seminole Tribe of Florida, as it deems appropriate. Also, we encourage the SFWMD to continue its outreach efforts to the Tribes in conjunction with the proposed project. The EPA notes that in its January 8, 2018, letter to the SFWMD, the Miccosukee Tribe of Indians of Florida outlines concerns regarding the proposed EAA Reservoir project. The EPA works closely with both Tribes on Everglade matters and is committed to working with the SFWMD, state and Federal partners regarding that Tribes' water quality and water management concerns. Overall, the EPA is supportive of the TSP and we concur with the USACE that the modifications to the CEPP would be beneficial to the northern estuaries and would increase much needed flows to the Everglades. The DEIS has been rates as a Lack of Objections ('LO'). The EPA appreciates the opportunity to review the DEIS and looks forward to continued participation in the Comprehensive Everglades Restoration Plan project development process. If you wish to discuss this matter further, please contact Ms. Jamie Higgins, my staff, at (404 562-9681 or by email at higgins.jamie@epa.gov.				x		x	The Corps initiated and is in consultation with the Miccosukee Tribe of Indians of Florida, as you noted in your comment.
Tracy Robb, Stan Ganthier, & Tom Behlmer Office of Ecosystem Projects Florida Department of Environmental Protection		The purpose of the South Florida Water Management District's (SFWMD's) Section 203 Study 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 the environment, and municipal, industrial, and agricultural users more than would be accomplished in the authorized Central Everglades Planning Project (CEPP). The SFWMD Preferred Alternative A (or Recommended Plan) components include a 10,500-acre reservoir, approximately 23 feet deep (240,000 acre-feet [ac-ft.]); a 6,500-acre Stormwater Treatment Area (STA); and conveyance improvements to the Miami and North New River Canals within the Everglades Agricultural Area. Alternative C240A will significantly increase CEPP flows to the central portion of the Everglades from an average annual flow of approximately 210,000 acre-feet to an average annual flow of approximately 370,000 ac-ft. Alternative C240A also provides flexibility in Lake Okeechobee operations by increasing storage, treatment, and conveyance to the south, which will reduce harmful discharges from Lake Okeechobee to the St. Lucie and Caloosahatchee Estuaries in addition to what was provided in the 2014 CEPP Final Integrated Project Implementation Report and Environmental Impact Statement (EIS). The SFWMD prepared a feasibility study and environmental documentation (study) pursuant to Section 203(a)(1) of the Water Resources Development Act of 1986 (33 United Stated Code [USC] 2231(a)(1)), as amended. The SFWMD submitted this study, called the CEPP Post Authorization Change Report (PACR) on march 30, 2018, to the Assistant Secretary of the Army for Civil Works (ASA[CW]) for review to determine under 33 USC 2231(b) whether the study complies with federal laws a regulations applicable to feasibility studies of water resource development projects. This SFWMD study, if approved, would be a Post Authorization Change Report (PACR) to modify the CEPP, which was authorized as a federal project by Congress in 2016. The SFWMD request modified CEPP features specific to the New Water Project Partnership Agreement. The federal action of the ASA(CW) is to evaluate and report whether the project is feasible and provide any recommendations concerning the project design or conditions for construction to several congressional committees. Under Section 203 guidance, the U.S. Army Corps of Engineers (Corps) is not involved in a non-federal interest's process of the development of alternatives but may provide technical assistance at the non-federal interest's expense (in this case, SFWMD is the non-federal interest). The National Environmental Policy Act (NEPA) applies to the federal action in response to the submittal of the feasibility study. Therefore, the Corps has prepared this EIS in accordance with NEPA to evaluate and document effects on the human environment of the SFWMD Preferred Alternative prepared under Section 203 in relation to the No Action Alternative, which the authorized 2014 CEPP features. The Draft EIS refers to the CEPP PACR as the SFWMD Section 203 Report. The SFWMD's study has documented their consideration of the effects of their proposed activity on the human environment in a manner that was intended to be consistent with NEPA. Information from the SFWMD environmental analysis has been used for this NEPA preparation. The Department previously provided comments during the SFWMD's CEPP PACR/Section 203 Report review process in the form of a Final Order on March 5, 2018. The Department also issued a Final order (Office of the General Counsel No. 18-0138) in response to the SFWMD's submittal of the Final State Compliance Report for the CERP - CEPP PACR on March 5, 2018. In issuing this Order, the Department finds that the SFWMD has provided sufficient information to demonstrate compliance with the criteria outlined in Section 3736.1501(5). Florida Statutes, for the amendments to CEPP as set forth in Alternative C240A.						x	Thank you for your commnts below.
		COMMENTS: The department notes that in the Draft EIS, the Executive Summary (page ES-8), Section 4 (Table 4-3 and Section 4.20.1), and Section 5.5 discuss water quality concerns associated with proposed conversion of the A-2 Flow Equalization Basin (FEB) to a reservoir. The Draft EIS states that "a sensitivity model run would need to be performed, with a settling rate of zero, for the reservoir(s) to ensure water quality standards would be acheived." The Department reviewed settling rate assumptions and concluded the project met planning level water quality expectations. No further analysis was necessary on settling rate. Based on the preliminary modeling conducted for the A-2 Reservoir, the SFWMD conducted sensitivity runs on the settling rate for the reservoir based on water depth resulting in available settling rate at 2.5 meters per year. This assumption is certainly reasonable for modeling. One of the reasons stated for proposing a zero settling rate is that the reservoir will not have vegetation. It should be recognized that submerged aquatic vegetation (SAV) also improves water quality in surface waters and the A-2 Reservoir is expected to operate in a range tht will support SAV. The Department recognized the model uncertainties in the Final Order of the CEPP PACR for compliance with Section 373.1501, noting tat regardless of the modeling predicitons, permit conditions will ultimatley require attainment with the applicable water quality based						x	The WQBEL will be required to be met in order to release water to the Everglades.
	1	The project will be designed to treat all beneficial flows to the Everglades Protection Artea predicted by the Regional Simulation Model so that the applicable WQBEL will be attained.						x	
	2	The real-time operational decisions made by SFWMD will prevent the majority of diversions predicted by the Dynamic Model for Stormwater Treatment Areas, as demonstrated in Water Year 2018. Moreover, the Department's existing permits restricts diversions to specified limited circumstances, and these permit conditions will continue to apply in the future.						x	
	3	The modeling contains various conservative assumptions and practices to provide certainty that the applicable WQBEL will be achieved by the project. Although all modeling and associated assumptions have some level of uncertainty, permitting requirements applicable to the STAs ensure the WQBEL will ultimatley be achieved. In the event the WQBEL is not attained, additional actions to meet water quality requirements must be undertaken.						x	
		SPECIFIC COMMENTS:							
	1	The abstract states that ~360,000 ac-ft of water on an average annual basis will be redirected south from Lake Okeechobee through the Greater Everglades by the SFWMD Preferred Alternative, whereas the second paragraph on page ES-7 refers to 370,000 ac-ft of said water. Please revise the approximate volume of redirected water for consistency throughout the document.						x	The change noted will be made in the Final EIS.
	2	Please revise "imminent domain" to "eminent domain" for the second bullet under Planning and Policy on page ES-8 as well as for the first bullet on page 5-12.						x	The change noted will be made in the Final EIS.
	3	On page 1-3, please revise the title of Figure 1-1 to math the heading above the figure.						x	The change noted will be made in the Final EIS.
	4	In the top hand of page 3-5, "Conveyance Improvement" and "Reservoir "Operations" should not be bulleted but instead should be left-justified (as shown for "Storage and Treatment").						x	The change noted will be made in the Final EIS.
	5	On page 4-13, please revise the first sentence to reference Table 4-3 (not Table 4-4).						x	The change noted will be made in the Final EIS.
	6	In Table 4-3 - Effects of Recommended Plan on Water Quality, under the "No Action Alternative" for Lake Okeechobee, please revise the last sentence to state that the Basin Management Action Plan was developed via a public stakeholder-driven process and then offically adopted in December 2014. Also, the comment suggests that the additional modeling effort should be accomplished before construction.						x	The change noted will be made in the Final EIS.
	7	Under 4.20.1, Paragraph 6, the first sentence mentions the deep FEBs when it should refer to the deeper Reservoir. The Department is supportive of the Everglades Agricultural Area Reservoir and Stromwater Treatment Area Project, sincerely appreciates the opportunity to comment, and looks foward to continuing our partnership with the Corps and SFWMD. Should you have any questions regarding out comments, please contact Natalie Barfield at (850) 245-3197.						x	The change noted will be made in the Final EIS.

Commenter		Comments	Polluting estuaries, water quality concerns	Solution too small	Solution takes too long/Immediate action needed to clean water and/or stop releases	Support	Stop sending water to estuaries, send south to Everglades	Other	Additional Response
Timothy A. Parsons, Ph.D. Director, Division of Histroical Resources & State Historic Preservation Officer		The Florida State Historic Preservation Officer reviewed the referenced project for possible effects on historic properties listed, or eligible for listing, in the National Register of Historic Places (NRHP). The review was conducted in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 CFR Part 800: Protection of Historic Properties. A 2013 cultural resources assessment survey (CRAS) for a portion of the area of potential effect (APE) identified four archaeological sites (FMSF MS# 20373). Of particular concern are sites PB16039, which is considered eligible for listing in the NRHP, and PB16040, which currently has insufficient information to make a determination of eligibility for listing in the NRHP, but does include documented human remains. Both sites should be considered as planning for the project continues. Additional work will be necessary to evaluate PB16040, if effects to the site cannot be avoided by project activities. As stated in your letter, an additional CRAS will be necessary to identify and document cultural resources within the final APE and additional Section 106 consultation will occur during the pre-construction engineering and design (PED) phase. We look forward to continuing consultation with the Corps and encourage the Corps to complete any additional cultural resources assessments early in the PED phase to ensure inclusion of all cultural resources throughout the planning phase. If you have any questions, please contact me by email at Jason.Aldridge@dos.myflorida.com, or by telephone at 850-245-6344.						x	Thank you for your response. The Corps will continue coordination.
Rebecca Elliot, Environmental Manager Office of Agricultural Water Policy Florida Department of Agriculture and Consumer Services		The Florida Department of Agricultre and Consumer Services (FDACS) appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (EIS) Central Everglades Planning Project (CEPP) South Florida Water Management District (SFWMD) Section 203 Evergaldes Agricultural Area (EAA) Southern Reservoir and Stromwater Treatment Area (STA) (CEPP Post Authorization Change Report (PACR)), for mulitple counties dated June 2018. We are submitting the following comments for consideration as part of the Florida State Clearinghouse consistency evaluation. Our review focused on aspects of the Draft EIS CEPP SFWMD Section 23 EAA Southern Reservoir and STA (CEPP PACR) which may impact private agricultural lands and agricultural operations. The comments provided are specific to the topics addressed below and do not consitute a review od the entire Draft EIS and its supporting appendices. **COMMENTS** (listed below) Thank you for the opportunity to provide Clearinghouse comments. We look forward to continued progress on CERP projects and working with out state and federal partners to improve system-wide capabilites. If you have any questions reagrding FDACS' comments, please contact Ray Scott at (850) 617-1716 or Rebecca Elliott at (561) 682-6040.						x	Thank you for your comments below.
	1	Project Dependencies. The project dependencies and sequencing of CEPP and non-CEPP projects is a major concern for FDACS since the success of all projects without negative impacts to both developed and undeloped lands relies on proper sequencing to address water quality, construction prerequisites, operational options, and seepage control. Based on our review, it is not clear to us that the carefully thought out sequencing included in CEPP has been followed.						x	The project dependencies of CERP and non-CERP features needed for the implementation of the CEPP New Water Modification Plan remain the same as the original CEPP and are detailed in Section 6.7.1.1 of the PACR.
	2	Water Supply. We are pleased to see the significant reduction in water shortage cutbacks shown in the Draft EIS and CEPP PACR through use of the EAA reservoir to meet irrigation needs in the service area. The Corps needs to be explicit in making this operational requirement a formal part of the operation manual section associated with the reservoir.						x	Water supply to the basins could come from water stored in the A-2 Reservoir at such times when additional capacities are available beyond those identified for restoration flows to the Everglades. Water supply conditions for the A-2 Reservoir are described in Annex C Draft Project Operating Manual of the CEPP PACR.
	3	Flood Protection. Agricultural flood protection is another major concern for FDACS. Based on a quick review of the model output readily available, it appears that the current level of service will be maintained. The EAA reservoir project in the 1999 plan approved by Congress was one of only two projects that included the enhancement of flood protection as a project purpose. The conveyance enhancements in this plan coupled with the new inflow pump station for the reservoir would allow some enhancement to be achieved through purely operational means and it would seem this should be part of the analysis. The ability to reduce peak stage in both the Miami and North New River Canals could greatly reduce the need for flood control pumping at S-2 and S-3 while providing improved flood protection for the farms and cities near the lake.						x	Thank you, for your comment. Although flood control is not a project purpose of CEPP or the CEPP New Water Modification Plan the current level of service will be maintained. Development of the POM is an iterative process that will continue throughout the life of the project. The POM will be updated at periodic intervals during the detailed design, construction and operational testing and monitoring phases of the project. Refinements to the operating criteria in the POM will be made as more project design details, data, operational experience, and general information are gained during these project phases.
	4	Operational Changes Available Under Existing CERP. Several areas show improved environmental performance that seems to be related to operational changes that are not dependant on changes to the size of the A-2 reservoir. Ir specifically mentions changed to the upper bands of the Lake Okeechobee schedule and modifications to south Dade operations to achieve more benefits for Florida Bay. These changes, and potentially others, that are not dependent on the additional storage in A-2 should be included in the EIS analysis so it is clear that all the outcomes shown in the PACR are not related solely to the additional storage being proposed and are available under the existing CERP authorization.						x	The original CEPP recommended plan was analyised as part of the PACR/EIS as the FWO condition. The additional benefits provided by the increased shortage and treatment in the A-2 is provided in the evaluation of the action alternatives. The operational changes for Lake Okeechobee and South Dade operations are needed in conjuction with the additional storage and treament to achieve the full benefits of the TSP. Additional evaluations of these operational changes were previously detailed in the 2014 CEPP Final PIR/EIS.
James Erskine, Evergaldes Coordinator Office of Executive Director Florida Fish and Wildlife Conservation Commission		Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed the above-referenced assessment and provides the following comments in accordance with FWC's authorities under Chapter 379, Florida Statutes; Chapter 68, Florida Administrative Code; Article 4, Section 9, of the Florida Constitution.							
		Comments and Recommendations:							
	1	The Caloosahatchee Estuary and St. Lucie Estuary with their associated marshes, waterways, barrier islands, and beaches are highly valuable natural systems that support a critical array of ecosystem services including habitat for diverse fish and wildlife, high quality outdoor recreation for Florida residents, and tourism. Damaging, high-volume discharges from Lake Okeechobee negatively impact these natural systems and have a direct effect on communities and economies. Implementing the Recommended Plan would go beyond the expected improvements that would be achieved by the authorized CEPP plan (No Action Alternative) and further decrease damaging, high-volume, freshwater discharges from Lake Okeechobee that are currently sent to the Caloosahatchee Estuary and St. Lucie Estuary. Reducing the number, return frequency, and severity of undesirable discharges from Lake Okeechobee would improve the salinity conditions favorable to fish and wildlife in the Caloosahatchee and St. Lucie Estuaries and have a direct positive effect on these natural systems.				x			
	2	The FWC has fish, wildlife, and land management responsibilities for Water Conservation Areas (WCAs) 2 and 3, which are managed as the Everglades and Francis S. Taylor Wildlife Management Area (WMA). These areas comprise a major portion of the central Everglades ridge and slough ecosystem. The Preferred Alternative in the DEIS would increase freshwater flows to this WMA and the central Everglades above those proposed in the CEPP, from an average annual flow of approximately 210,000 acre-feet to an average annual flow of approximately 370,000 acre-feet. Although the plan may result in more high-water events in the central Everglades, the increased flow volumes would aid in re-establishing sheet-flow that restores microtopography, directionality, and the spatial extent of ridges and sloughs, especially those in northwestern WCA 3A. The additional water made available by the Recommended Plan is essential for restoration and provides further ecological benefits to Everglades National Park and Florida Bay.				x			
	3	The FWC supports amending the CEPP to include the Preferred Alternative and finds the project consistent with FWC's authorities under the Coastal Zone Management Act/Florida's Coastal Management Program. FWC staff appreciate the opportunity to continue working with our state and federal partners through the Preconstruction, Engineering, and Design and permitting phases to maximize wildlife, conservation, and recreational benefits. If you need any further assistance, please contact our office by email at FWCConservationPlanningServices@MyFWC.com.				x		x	Thank you for your support.
Ernie Marks, Executive Director South Florida Water Management District		**COMMENTS (listed below)** The SFWMD has demonstrated a continued commitment in Everglades restoration by preparing the CEPP PACR. We look forward to a continued commitment from the Corps on the CEPP PACR DEIS so it can move quickly from the authorization phase to project implementation.						x	Thank you for your comments below.

Commenter		Comments	Polluting estuaries, water quality concerns	Solution too small	Solution takes too long/Immediate action needed to clean water and/or stop releases	Support	Stop sending water to estuaries, send south to Everglades	Other	Additional Response
	1	The DEIS prepared by the Jacksonville District state multiple times throughout the document that compliance with State water quality is uncertin with the Recommened Plan and that additional modeling is needed for sizing of the stormwater treatment area (STA) to ensure compliance with water quality standards. The District disagrees with these statements. The DEIS does not demonstrate the need for or provide any technical basis to support these statements and as such, they should be removed from the document. The Dynamic Model for Stormwater Treatment Areas (DMSTA) that was used for the CEPP PACR was developed by the Department of the Interior (DOI), peer reviewed and certified for use in CEPP . The DMSTA model has been used for decades, is approved by the Environmental Protection Agency (EPA) and DOI and is a Corps approved model. The DMSTA project files for CEPP were based on the original Restoration Stategies (RS) scenario, identified in consultation with EPA and DOI. The DMSTA modeling for the CEPP PACR is consistent with the DMSTA modeling performed in Restoration Strategies Regional Water Quality Monitoring Plan and CEPP and are outlined in the technical memorandum referenced in the model documentation report found in Appendix A, Annex A-2 of the CEPP PACR. Key assumptions such as depth and timing of flows were checked to ensure the necessary treatment capacity in the new and existing STA's would meet State water quality standards. Some assumptions, such as those related to diversion flows and assumed reservoir settling rates, have been handled in a variety of ways in previous Restoration Strategies and CERP planning studies, but DMSTA model sensitivity to these assumptions in the CEPP PACR is limited. In particular, the CEPP PACR assumptions for reservoir settling rate (resulting in an effective settling of ~1.5 m/yr) are already more conservative than values used in previous CERP plannng and have a good basis in comparison to observed behavior of similar features including Lake Okeechobee. While technical uncertainty is inherent to all modeling efforts, including those relied upon and undisputed in Restoration Stategies and the CEPP, the level of rigor and risk-avoidance applied to the planning-level water quality modeling for the CEPP PACR equals or exceeds the level of rigor previously accepted in the adoption of RS and the authorization of the CEPP.						x	The Corps has confimed DMSTA is the appropriate model to use.
	2	The DEIS also states that the Recommended Plan assists to achieve the CERP goal for restoration flows and adds another increment of benefits to Everglades restoration. The 2014 CEPP was the first incremental step in increasing average annual flows to the central Everglades. This first incremental step in increasing average annual flows to the central Everglades. This first increment of authorized CEPP provided approximately 210,000 ac-ft on an average annual basis to the central Everglades, which is approximately two-thirds of the CERp performance goal. Screening efforts in plan formulation for the CEPP PACR utilized the CERP Goal and attempted to deliver the remaining one-third of new water essential to Evergaldes restoration consistent with the CERP performance goal. Early screening outcomes identified a high potential for this project to meet or exceed the CERP Goals in sending water to the central Everglades. The screening analysis compared the Central and Southern Florida Project CERP Programmatic Regulations Pre-CERP Baseline from 2005 with the CERPA scenario, the updated model scenario from the RECOVER 2005 Initial CERP Update effort, to establish the CERP Goal for flow to the central portion of the Everglades. This analysis identified the CERP Goal flow target of approximatly 300,000 ac-ft of new water on an average annual basis over the 36-year modeled simulation period (1965-2000) availible from RECOVER. This CERP Goal flow target, based on a 36-year period of record, became the updated target to continued plan formulation work. The Recommended Plan (C240A) was ultimately able to achieve 97 percent of the CERP Goal over this 36-year period of record. However, consistent with CEPP, Alternative C240A was modeled and analyzed over the longer 41-year period of record (1965-2005). Similar to CEPP, the 41-year period of record was used in evaluation of effects for the CEPP PACR. This evaluation of Alternative C240A provides an approximatley 370,000 ac-ft increase in average annual flow to the central Everglades meeting the CERP Goal.						x	Thank you for the comment.
		EDITORIAL COMMENTS ON DEIS:							
	1	**PG #:** ALL **Specific Edits:** Suggest doing another find/replace of 'proposed action' to "Recommended Plan"							This is typically completed between a draft and final EIS, the replacement will be made.
	2	**PG #:** ES-3 **Specific Edits:** ES-3, last paragraph - clarify this sentence "The Final Array of Alternatives in the SFWMD Section 203 Report included ~~five~~ four alternative scenarios, with ~~an~~ two additional alternatives that included ~~operations~~ operational flexibility to include water							This section has been edited to more accurately describe the alternatives in the conditionally authorized project.
	3	**PG #:** ES-3 **Specific Edits:** Page ES-3, paragraph 3, (mid paragraph) there is a period after "costs" that should be a colon.							This section has been edited to more accurately describe the alternatives in the conditionally authorized project.
	4	**PG #:** ES-7 **Comment:** USACE EIS states that the additional freshwater flow "assists to achieve the CERP goal" our feasibility study shows that the additonal flow meets/achieves the CERP goal. See comments in letter. **Specific Edits:**							The USACE is committing to improving flows.
	5	**PG #:** ES-8 **Comment:** "The expected benefits from the Recommended plan include improvements on the health of the Caloosahatchee and St. Lucie estuaries due to the reduced potential for undesirable discharges from Lake Okeechobee . However, there is a potential for slightly degraded water quality conditions in the new Lake Okeechobee water that would be discharged to WCA 3A if the STA features are undersized. A sensitivity model run regarding settling rates would need to be performed, with a setlling rate of zero, for the reservoirs to ensure water quality standards would be achieved." See comments in letter. **Specific Edits:**							Modeling is being conducted and may continue in the preconstruction, design, and engineering (PED) phase of this project to confirm water quality treatment performance if additional operational changes are considered.
	6	**PG #:** ES-8 **Comment:** "STA bypasses should be avoided and further design may be required to meet water quality standards." See comments in letter. **Specific Edits:**							Further considerations are being made during PED.
	7	**PG #:** 1-3 **Specific Edits:** The caption for Figure 1-1 "Lake Okeechobee Water level Comparison for January 9, 2018" is incorrect. The bar graph shows SFWMD Area Wide Monthly Rainfall for the period June 2016 to January 2018 (January value is partial). This figure is referenced in the text in a paragraph discussing the 2017 Wet Season rainfall.							Figure title changed to: Figure 1 1. Lake Okeechobee Water Level Comparison for SFWMD Area Wide Monthly Rainfall from June 2016 to January 9, 2018
	8	**PG #:** 1-6 **Comment:** Page 1-6 indicates the FEB is converted to a reservoir, but the footprint isn't exact so this statement is misleading.							Added, "The project footprint includes additional acreage to account for land needed for the STA as well." on page 1-7
	9	**PG #:** 3-15 **Specific Edits:** In Table 3-3, there are multiple superscript 2's but no corresponding footnotes.							This table has been removed from the document to avoid confusion on the benefits.
	10	**PG #:** 3-15 **Specific Edits:** Section 3.2.7 first paragraph, Habitat Units (Hus) needs capital U							This section has been removed from the document to avoid confusion on the benefits.
	11	**PG #:** 3-16 **Specific Edits:** 'the associated Consent Agreement" should be "the associated Settlement Agreement and Consent Orders"							This section has been removed from the document to avoid confusion on the benefits.
	12	**PG #:** 3-25 **Specific Edits:** The 2 bullets: '240,000 ac-ft stroage reservoir, plus A-1 FEB" and "10,500 acre reservoir, approximately 23 ft. deep" are the same facility and should be combined into one bullet to minimize confusion.							Edit made.
	13	**PG #:** 3-25 **Specific Edits:** Section 3.5 first line needs end paren.							Edit made.
	14	**PG #:** 3-3 **Specific Edits:** SWMFD should be SFWMD.							This section was heavily edited to make the plan formulation more clear.
	15	**PG #:** 3-5 **Specific Edits:** The 'Conveyance Improvement" and "Reservoir Operations" bullets should be shifted left and the bullet in front should be removed (similar to "Storage and Treatment" above).							This section was heavily edited to make the plan formulation more clear.
	16	**PG #:** 3-5 **Specific Edits:** Remove Bullets on page 3-5 in front of "Conveyance Improvements" and "Reservoir Operations"							This section was heavily edited to make the plan formulation more clear.
	17	**PG #:** 3-5 **Specific Edits:** Last sentence before table 3-1 need a parenthesis after the number 6.							This section was heavily edited to make the plan formulation more clear.
	18	**PG #:** 4-13 **Comment:** Table 4-3: 'Dynamic Model for Stormwater Treatment Areas (DMSTA) DMSTA water quality modeling was performed, and STAs are sized to ensure Recommended Plan compliance with the water quality based effluent limits (WQBEL). However, to minimize risk, additional modeling prior to construction would need to affirm settling rates of zero within the reservoir to ensure water quality compliance. Water should not bypass the STA to the WCAs." See comments in letter. **Specific Edits:** One of the DMSTAs needs to be removed.							No edits made based on comment.
	19	**PG #:** 4-13 **Specific Edits:** In the first sentence, "Table 4-4" should be "Table 4-3".							Edit made.
	20	**PG #:** 4-15 **Comment:** "Consistent with the environmental effects detailed in Tabloe 4-3, there remains significant uncertainty whether the SFWMD recommentded plan as presently planned and designed will fully comply with State water quality standards and fully realize the indicated environmental benefits." See comments in letter.							Comment responded to above.
	21	**PG #:** 4-16 **Comment:** (Aesthetics): regarding the statement "…as the view from Lake Okeechobee would be blocked." There is no way one could see Lake Okeechobee from the EAA Reservoir site or vice-versa, therefore the reservoir levee heights will not impact the view from Lake O.							Comment taken into consideration.
	22	**PG #:** 4-17 **Comment:** (Wetlands): This section focused on wetlands within the EAA only. Suggest this be expanded to include impacts to the Everglades wetlands.							This EIS focuses on the footprint area of change from CEPP to the change in features in the SFWMD proposed project.

Commenter		Comments	Polluting estuaries, water quality concerns	Solution too small	Solution takes too long/Immediate action needed to clean water and/or stop releases	Support	Stop sending water to estuaries, send south to Everglades	Other	Additional Response
	23	**PG #:** 4-18 **Specific Edits:** Section 4.17.2 should reference Table 4-5 not 4-6.							Edit made.
	24	**PG #:** 4-2 **Comment:** "This additional freshwater flow is essential to Everglades' restoration and would add another increment of benefits to Everglades' restoration." Feasibility study states that the recommended plan meets CERP Goal for flows to Everglades. See comments in letter.							No edits made based on comment.
	25	**PG #:** 4-21 **Specific Edits:** Section 4.17.4 should reference Table 4-6 for Effects on Recreation not 4-7 and Table 4-7 not 4-8 for closure in EWMA.							Edit made.
	26	**PG #:** 4-22 **Specific Edits:** Table 4-6 Northern Estuaries Recommended Plan description appears to be cut off.							Edit made.
	27	**PG #:** 4-23 **Specific Edits:** Table 4-6 EWMA Recommended Plan description appears to be cut off.							Edit made.
	28	**PG #:** 4-24 **Specific Edits:** Section 4.18 Cultural Resources first paragraph, an acreage of 34,500 is mentioned as the total APE, it further stipulates that CRAS have been conducted in approximately 30,000 acres. For consistency, this figure should be 31,000 acres. Further, if strictly speaking of additional lands to be surveryed for CR, on the second paragraph of the same section, it should be read 3,500 acres instead of 4,500 acres.							Edit made.
	29	**PG #:** 4-25 **Comment:** **Specific Edits:** Page 4-25. "established in implementing regulations for Section 106 of the NHPA (36 CFR 800)" needs a period at the end.							Edit made.
	30	**PG #:** 4-25 **Comment:** **Specific Edits:** Section 4.18 should reference Table 4-8 not 4-9.							Edit made.
	31	**PG #:** 4-31 - 4-34 **Specific Edits:** Table 4-10: "Hydrology" is mistakenly repeated as a table header on all 3 pages of Table 4-10.							Edit made.
	32	**PG #:** 4-33 **Comment: Table 4-10:** under Water Quality for the Proposed Action which states "…additional modeling of the sizing of the STAs would need to be completed to ensure compliance with state water quality standards." See comments in letter.							see response to comment
	33	**PG #:** 4-6 **Comment:** **Specific Edits:** Change South Florida Ecological Report to South Florida Environmental Report, here and throughout the document. Use SFER 2017, rather than SFWMD 2017 to cite the Report.							Edit made.
	34	**PG #:** 5-4 **Specific Edits:** Table 5-1. Endangered Species Act of 1973, Status, change "wood work" to "wood stork". And the font style is inconsistent.							Edit made.
	35	**PG #:** 5-12 **Comment:** "The expected benefits from the Recommended Plan include improvements on the health of the Caloosahatchee and St. Lucie estuaries due to the reduced potential for undesirable discharges from Lake Okeechobee. However, there is potential for slightly degraded water quality conditions in the new Lake Okeechobee water that would be discharged to WCA 3A if the STA features are undersized. A sensitivity model run regarding settling rates would need to be performed, with a settling rate of zero, for the reservoirs to ensure water quality standards would be achieved." See comments in letter.							see response to comment
	36	**PG #:** 5-12 **Comment:** "STA bypasses should be avoided and further design may be required to meet water quality standards." See comments in letter.							see response to comment
ICAR Case # 8326C EVERGLADES AGRICULTURAL AREA SOUTHERN RESERVOIR AND STORMWATER TREATMENT AREA **This document is a coordinated compilation of comments received from the three affected FDOT Districts, D's 4, 1 and 6 (D4 is listed first because the project is in D4). If there are questions concerning the overall scope and stance of these comments please contact:** **Martin Markovich** **FDOT Office of Policy Planning** **Questions concerning technical issues raised in the District comments should be referred to the District staff listed within those comments.**									
D4 Comments:		1. The District acknowledges and concurs with the need for a dam break analysis and Emergency Action Plan for the "A-2 Reservoir" as it poses life-threatening conditions for motorists traveling along US-27 as well as the potential to impede emergency evacuation. Please provide the necessary analysis and a copy of the Emergency Action Plan to the District Four Maintenance Engineer. Morteza Alian FDOT District Four 3400 West Commercial Blvd						x	Concur. The dam break analysis will be developed during the current planning phase of this project will be submitted to the FDOT District 4 Maintenance Engineer when complete. The Emergency Action Plan will be developed during the PED phase of design..
		2. Please Coordinate with the FDOT Palm Beach County Permit Coordinator for information regarding needed construction access permits and Maintenance of Traffic (MOT) needs for work within or adjacent to US 27. Jerry M. Dean District Four Permits Coordinator 3400 W. Commercial Blvd. Ft. Lauderdale, FL 33309 Tel: (954) 777-4374 jerry.dean@dot.state.fl.us						x	Concur. This coordination will be done during the future Pre-Construction, Engineering & Design (PED) phase of this project.
		3. Please provide channel stabilization analysis for the NNR where velocities are to exceed 2.5 ft/sec in reference to US-27 for proper location identification.						x	Concur. During the future PED phase of this project, a Bridge Hydraulics Report will be submitted to FDOT District 4, which will include scour and channel stabilization analyses for each proposed bridge.
		4. Please provide a cross section showing US-27 and NNR canal cross section to ensure maximum water stages will have no impact to the US-27 minimum stabilized base clearance.						x	Concur. During the future PED phase of this project, base clearance analysis for US-27 with cross-sections of US-27 will be submitted to FDOT District 4.

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	5. Please note that the Department is currently in the design process to widen shoulders and extend turn lanes along US 27 under FM Projects 439929-1, 439930-1, 440108-1, 440150-1 and 440158-1. For further information, please contact the FDOT project manager: Raul Dominguez Project Manager - FDOT D4 - Consultant Management Office 3400 West Commercial Blvd., Fort Lauderdale, FL 33309 Office: (954) 777-4061 Raul.dominguez@dot.state.fl.us						x	Acknowledged. During the future PED phase of this project, SFWMD will coordinate with FDOT District 4 about future widening projects and other planned improvements to US-27, when developing the plans for this project.
	6. The project lead agency (ACOE or SFWMD) should inform District Four of this EAA project's anticipated construction start date, when known, to assure coordination as needed for planned or programmed projects or maintenance activities along US 27 to be conducted during the duration of this project.						x	Concur. The planning process for the CEPP Section 203 Report was led by the SFWMD. During the future PED phase of this project, SFWMD will provide the anticpated construction start date for the project to FDOT District 4.
	7. An overall Department contact related to this ICAR is: James Poole, P.E. District Drainage Engineer – District 4 Florida Department of Transportation 3400 West Commercial Boulevard Fort Lauderdale, Florida 33309-3421 (954) 777-4204 James.Poole@dot.state.fl.us						x	Acknowledged.
D1 Comments: FDOT District 1 facilities, which include major highways/roadways in the area, begin at the Hendry County / Palm Beach County line, approximately 13 miles west of the juncture of the Miami Canal and the Herbert Hoover Dike. Due to the proximity and the type of improvements proposed, and based on the information provided, the proposed alternative does not appear to have adverse impacts to the major state roadways in District 1. The District offers the following comments:	1. U.S Hwy 27 is an emergency evacuation route for the coastal communities (east and west). The widening of the Miami Canal is considered as part of the Tentatively Selected Plan (TSP). Since the juncture of the Miami Canal and the Herbert Hoover Dike is approximately 13 miles from District One's boundary, please coordinate the design plans with District staff: Drainage Brent Setchell, PE Office Phone: (863) 519-2557 Brent.Setchell@dot.state.fl.us Structures/Bridges James J. Jacobsen, P.E. Office Phone: (813) 612-3390 James.Jacobsen@dot.state.fl.us Andra Diggs II, PE Office Phone: (863) 519-2426 Andra.Diggs@dot.state.fl.us						x	Concur. During the future PED phase of this project, SFWMD will coordinate the development of the design plans for this project with the FDOT staff listed in this comment.
	2. It appears there are three proposed bridges for this project: A.10.7 BRIDGES Two new bridges (Structures B-2 and B-3) will be constructed to carry traffic on U.S. 27 over the new A-2 Reservoir Inflow-Outflow Canal. U.S. Hwy. 27 is a divided highway at the planned location of the new A-2 Reservoir Inflow-Outflow Canal; therefore, dual bridges will be constructed, consisting of a reinforced concrete slab superstructure, supported on two end bents and intermediate bents. Each of the end and intermediate bents will consist of square prestressed concrete piles with reinforced concrete cap beams. A third bridge (Structure B-1) will be constructed to carry traffic on the L-23 Levee Road (along the east side of the Miami Canal) over the new A-2 Reservoir Inflow-Outflow Canal. This bridge will be designed in a similar manner to the two new bridges for U.S. Hwy. 27 (Structures B-1 and B-2). The bridge configuration under any conditions should maintain a minimum of two feet of freeboard above the design high water level of the connector canal. The Bridge Analysis Report and Location Hydraulic Report for the bridge development process have not been completed. Completion of these reports will be made upon approval of the A-2 Reservoir Inflow-Outflow Canal location, size and design. The three proposed bridges will be designed in accordance with AASHTO, Standard Specifications for Highway Bridges, 17th Edition. The bridge will be designed for an HS25 loading. Please continue to involve the appropriate FDOT Districts in the review of the bridge reports once they are developed for the US 27 bridges.						x	During the future PED phase of this project, a Bridge Analysis Report as well as a Bridge Location Hydraulic Report will be prepared for the three proposed bridges that are part of this project. In accordance with current FDOT standards, the three proposed bridges will be designed per the latest edition of the AASHTO LRFD Bridge Design Specifications and the latest edition of the FDOT Structures Manual.
	The Florida Department of Transportation (FDOT) District 6 thanks you for the opportunity to review the South Florida Water Management District Section 203 Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area Draft Environmental Impact Statement (DEIS). Although the proposed action is in Palm Beach and Broward Counties, the project utilizes drainage infrastructure that is adjacent to and has potential to impact Florida Department of Transportation (FDOT) District 6 facilities.						x	Thank you for your comment. An Emergency Action Plan (EAP) addressing and mitigating impacts to US27 will be prepared during the PED phase of the Project.
	ICAR Case # 8326C EVERGLADES AGRICULTURAL AREA SOUTHERN RESERVOIR AND STORMWATER TREATMENT AREA - Multiple Districts - PLANNED FOR EXPEDITED REVIEW (D6)							
	Document Review Comments Based on the subject FDOT review of Document 2, which is an Addendum to the original document based on the review and comments from Assistant Secretary of the Army for Civil works:							
	1 Addendum - Comment #1: The document did not include any major revisions to the TSP and therefore, did not have any major changes/updates in terms of hydrology/hydraulic results. Based on the subject FDOT review of Document 3, which is the latest version (June 2018) of the report and includes a table that compares results in terms of stages, inflows/outflows, discharge volumes etc. between the "Recommended Plan" and "No-action Alternative":						x	Thank you for your comment, the DEIS will not make changes to the addendum by the SFWMD.
	2 DEIS Comment #1: According to Table 4.2 in DEIS, the stage seems to have slightly increased within the Water Conservation Areas (WCAs), and at a few other locations, between the No-action Alternative and the Recommended Plan. Please check and make sure that the increases in stage are still acceptable. Do any increased flows, because of increased stage, have any adverse impacts downstream? If so, these should be noted and mitigated.						x	The flows downstream are not expected to have further effects than what was evaluated in CEPP (2014).
	3 DEIS Comment #2: The original March 2018 SFWMD report summarized the results for different stage and flow conditions on the different water control structures for the Tentatively Selected Plan (TSP). The document does not appear to state a recommended alternative. Is there going to be a specific scenario that is going to be developed as the recommended alternative, prior to the design phase?						x	The Recommended Plan was the TSP in the Draft EIS.
	4 DEIS Comment #3: It is not completely clear on whether a detailed dynamic model based on the above stage and flow scenarios for each structure was performed or not? If so, please confirm that all the scenarios discussed do not have any adverse impacts to water quantity and water quality downstream. If not, detailed dynamic modeling should be performed. Have all the permit regulation criteria been met?						x	All water quality standards will be adhered to by this project. Localized modeling for individual water control structures will be

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D6 Comments:	5	DEIS Comment #4: The additional flows from Lake Okeechobee that enter the major Miami and North New River canals may potentially send more flows downstream unless the releases are managed to make sure the peaks are not altered from the current practice Please confirm: Is the ACOE prepared to guarantee that peak flows will not increase substantially? If not, considerable further work needs to be done on the effects and mitigation of increased peak flows.							The Recommended Plan includes conveyance improvements along the Miami Canal (1000 cfs) and NNR Canal (200 cfs) and an additional inflow 4600 cfs pump station (P-1) for the A-2 Reservoir. The EAA conveyance canals will continue to be managed within the operational ranges prescribed within the governing Water Control Plan for Lake Okeechobee and the EAA. The Savings Clause analysis provided in Annex B of the SFWMD PACR report provides an overview of the MIKE SHE model results which indicate no adverse impacts to flood protections within the EAA. An additional analysis was completed by the Corps and can be found in Annex C of this Final EIS. The POM will be updated at periodic intervals during the detailed design, construction and operational testing and monitoring phases of the project. Refinements to the operating criteria in the POM will be made as more project design details, data, operational experience, and general information are gained during these project phases. Additional evaluations for the Savings Clause will be conducted during PED, if warranted due to design or operational changes, or changes resultant from other operational studies.
	6	DEIS Comment #5: Widening of Miami canal is part of the Tentatively Selected Plan (TSP). Detailed construction drawings on the proposed canal widening do not appear to be included in the document. The availability of Right of Way (ROW) for this construction is a concern. Has the recommended widening been reviewed and confirmed to be feasible? If not, considerable further work needs to be done.							
	7	DEIS Comment #6: FDOT District 6 facilities, which include major highways/roadways in the area, begin at the Miami-Dade / Broward County line, approximately 30 miles south of the proposed project site. Due to the proximity and the type of improvements proposed, and based on the information provided, the proposed alternative may not have adverse impacts to the major state roadways in District 6. Has this project been analyzed for any adverse downstream impacts or flooding issues to the FDOT roadways within FDOT District 6? Adverse impacts may arise from the additional flow release from Lake Okeechobee to Miami and North New river canal, or from the widening of the Miami Canal, or from the increased stages in the Water Conservation Areas (WCAs). If there has been no analysis of adverse downstream impacts or flooding to FDOT District Six roadways, then such an analysis should be undertaken before the project proceeds to the next stage.							
Theodore Isham, Tribal Historic Preservation Officer, Seminole Nation of Oklahoma		Based on the information provided and because the potential for buried cultural resources, the proposed project has an extreme probability of affecting archaeological resources, some of which may be eligible for listing in the National Register of Historic Places (NRHP). We recommend that an intensive literature/phaseI survey reports of the nearby archaeological sites from the states master site files be completed and sent to SNO HPO. Also, we request that all previous correspondence with the other tribes in the affected area be provided. We do request that if cultural or archeological resource materials are encountered at all activity cease and the Seminole Nation of Oklahoma and other appropriate agencies be contacted immediately. Furthermore, due to the historic presence of our people in the project area, inadvertent discoveries of human remains and related NAGPRA items may occur, even in areas of existing or prior development. Should this occur we request all work cease and the Seminole Nation of Oklahoma and other appropriate agencies be immediately notified.						x	Thank you for comments on the Section 106 letter included in the draft EIS. The USACE completed a Phase I cultural resources survey of the majority of the EAA area of potential effects in 2013. I will forward this report and all the previous correspondence that was conducted as part of the initial Central Everglades Planning Project study via AMRDEC SAFE as the files are too large to email. SFWMD is currently conducting cultural resources surveys of the remainder of the EAA area of potential effects. These surveys and the avoidance, minimization, or mitigation of effects to cultural resources will be coordinate with the Seminole Nation of Oklahoma, the Florida SHPO, and other interested Tribes prior to any undertaking. We appreciate your continued consultation on this project. Please do not hesitate to call or email with any further questions or concerns.