

Attachment: SFWMD Review Comments EAA Southern Reservoir and STA Draft EIS prepared by USACE Jacksonville District

Page #	Comment	Specific Edits
All		Suggest doing another find/replace of “proposed action” to “Recommended Plan”
P. ES-3		ES-3, last paragraph – clarify this sentence “The Final Array of Alternatives in the SFWMD Section 203 Report included five <u>four</u> alternative scenarios, with an <u>two</u> additional alternatives that included operations <u>operational flexibility to include water supply for other water related needs.</u> ”
P. ES-3		Page ES-3, paragraph 3, (mid paragraph) there is a period after “costs” that should be a colon.
P. ES-7	USACE EIS states that the additional freshwater flow “assists to achieve the CERP goal” our feasibility study shows that the additional flow meets/achieves the CERP goal. See comments in letter.	
P. ES-8	“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 settling rate of zero, for the reservoirs to ensure water quality standards would be achieved.” See comments in letter.	
P. ES-8	“STA bypasses should be avoided and further design may be required to meet water quality standards.” See comments in letter.	
P. 1-3		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.
P. 1-6	Page 1-6 indicates the FEB is converted to a reservoir, but the footprint isn’t exact so this statement is misleading.	
P. 3-15		In Table 3-3, there are multiple superscript 2’s but no corresponding footnotes.
P. 3-15		Section 3.2.7 first Paragraph, Habitat Units (Hus) needs capital U
P. 3-16		“the associated Consent Agreement” should be “the associated Settlement Agreement and Consent Orders”
P. 3-25		The 2 bullets: “240,000 ac-ft storage 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.
P. 3-25		Section 3.5 first line needs end paren.
P. 3-3		SWMFD should be SFWMD
P. 3-5		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).
P. 3-5		Remove Bullets on page 3-5 in front of “Conveyance Improvements” and “Reservoir Operations”
P. 3-5		Last sentence before table 3-1 need a parenthesis after the number 6.

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P. 4-13	Table 4-3: "Dynamic Model for Stormwater Treatment Areas (DMSTA) DMSTA water quality modeling was per-formed, 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.	One of the DMSTAs needs to be removed.
P. 4-13		In the first sentence, "Table 4-4" should be "Table 4-3".
P. 4-15	"Consistent with the environmental effects detailed in Table 4-3, there remains significant uncertainty whether the SFWMD recommended 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.	
P. 4-16	(Aesthetics): regarding the statement "...as the view from Lake Okeechobee would be blocked." There is no way one can see Lake Okeechobee from the EAA Storage Reservoir site or vice versa, therefore the reservoir levee heights will not impact the view from Lake O.	
P. 4-17	(Wetlands): This section focused on wetlands within the EAA only. Suggest this be expanded to include impacts to the Everglades wetlands.	
P. 4-18		Section 4.17.2 should reference Table 4-5 not 4-6
P. 4-2	"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.	
P. 4-21		Section 4.17.4 should reference Table 4-6 for Effects on Recreation not 4-7 and Table 4-7 not 4-8 for closures in EWMA.
P. 4-22		Table 4-6 Northern Estuaries Recommended Plan description appears to be cut off.
P. 4-23		Table 4-6 EWMA Recommended Plan description appears to be cut off.
P. 4-24		Section 4.18 Cultural Resources first paragraph, an acreage of 34,500 is mentioned as the total APE. It further stipulates that CRASs 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 surveyed for CR, on the second paragraph of the same section, it should read 3,500 acres instead of 4,500 acres.
P. 4-25		Page 4-25. "established in implementing regulations for Section 106 of the NHPA (36 CFR 800)" needs a period at the end.
P. 4-25		Section 4.18 should reference Table 4-8 not 4-9
P. 4-31-4-34		Table 4-10: "Hydrology" is mistakenly repeated as a table header on all 3 pages of Table 4-10.
P. 4-33	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.	
P. 4-6		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
P. 5-4		Table 5-1. Endangered Species Act of 1973, Status, change "wood work" to "wood stork". And the font style is inconsistent

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P. 5-12	"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 settling rate of zero, for the reservoirs to ensure water quality standards would be achieved." See comments in letter.	
P. 5-12	"STA bypasses should be avoided and further design may be required to meet water quality standards." See comments in letter.	