



SOUTH FLORIDA WATER MANAGEMENT DISTRICT

July 20, 2018

Mr. Chris Stahl
Florida Department of Environmental Protection
Florida State Clearinghouse
2600 Blair Stone Road, MS 47
Tallahassee, FL 32399-2400

Subject: Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area, Draft Environmental Impact Statement

Dear Mr. Stahl,

The South Florida Water Management District (SFWMD) developed an Integrated Feasibility Study and Draft Environmental Impact Statement (FS/DEIS) pursuant to Section 203(a)(1) of the Water Resources Development Act (WRDA) 1986, as amended, to recommend a post-authorization change to the federally authorized Central Everglades Planning Project (CEPP).

This FS/DEIS, called the Central Everglades Planning Project (CEPP) Post Authorization Change Report (PACR) will significantly increase the CEPP ecosystem restoration benefits to the Caloosahatchee and St. Lucie Estuaries and the central portion of the Everglades including Water Conservation Area 3 and Everglades National Park. The Tentatively Recommended Plan (TRP) recommended in the CEPP PACR has broad support from federal, state and local agencies, stakeholders, interest groups and the public.

The TRP provided in the CEPP PACR is consistent with the goals, objectives and project assurances of the Comprehensive Everglades Restoration Plan (CERP) and substantially decreases the frequency and intensity of damaging regulatory discharges from Lake Okeechobee to the St. Lucie and Caloosahatchee Estuaries. The CEPP as modified by the CEPP PACR and in conjunction with other authorized projects will provide a 63 percent reduction in the number of discharge events and an overall 55 percent reduction in discharge volumes from Lake Okeechobee to these Northern Estuaries. These modifications will also substantially increase the amount of treated water delivered to the central Everglades as envisioned in the CERP. On an average annual basis, additional flows to the central Everglades will be approximately 370,000 acre-feet, compared with the approximately 210,000 acre-feet provided by the previous version of the CEPP. The additional storage and treatment capacity of the TRP will deliver the remaining increment of freshwater flow to the central Everglades envisioned in the CERP and significantly reduce impacts to Florida's Northern Estuaries from United States Army Corps of Engineers (Corps) flood control releases.

On March 26, 2018, SFWMD initiated the Federal action by submitting the CEPP PACR to the Assistant Secretary of the Army for Civil Works (ASACW) for review, approval and subsequent transmittal to congressional committees for Congressional authorization. On May 30, 2018, the ASACW determined that the project identified in the CEPP PACR is feasible and recognized the

importance of this project to the restoration of the Everglades system. The National Environmental Policy Act (NEPA) applies to this Federal action in response to submittal of the CEPP PACR.

The Jacksonville District Corps has prepared a Draft Environmental Impact Statement (DEIS) for the CEPP PACR in accordance with NEPA to evaluate and document the effects on the human environment of the TRP. The SFWMD generally supports the DEIS prepared by the Jacksonville District and provides the following comments on the Everglades Agricultural Area Southern Reservoir and Stormwater Treatment Area, Draft Environmental Impact Statement. Editorial comments on the DEIS are included as an attachment to this letter.

1. The DEIS prepared by the Jacksonville District states multiple times throughout the document that compliance with State water quality standards is uncertain with the Recommended 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 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 Strategies (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 and CEPP. The modeling assumptions implemented for the CEPP PACR are equivalent to the assumptions in the 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 planning 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 Strategies 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.

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 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.

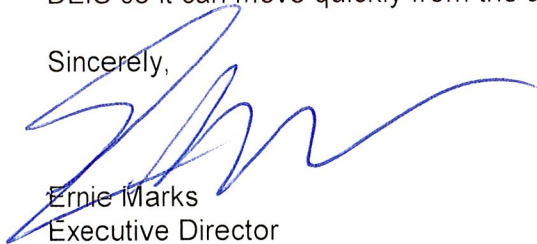
Screening efforts in plan formulation for the CEPP PACR utilized the CERP Goal and attempted to deliver the remaining one-third of new water essential to Everglades restoration consistent with the CERP performance goal.

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 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 CERP Goal flow target, based on a 36-year period of record, became the updated target for 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 the evaluation of effects for the CEPP PACR. This evaluation of Alternative C240A provides an approximately 370,000 ac-ft increase in average annual flow to the central Everglades meeting the CERP Goal.

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.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ernie Marks', is written over the typed name and title.

Ernie Marks
Executive Director

EM/bl
Enclosure