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June 25, 2020

Via Email: tedwards@sfwmd.gov

Toni Edwards
Senior Scientist, Applied Sciences Bureau
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33406

Dear Ms. Edwards:

Subject: Lake Worth Drainage District Comments on the May 2020 Draft Technical Document to Support the Central Everglades Planning Project Everglades Agricultural Area A-2 Reservoir Water Reservation

Thank you for the opportunity to review and provide comments on the May 2020 Draft Report "Technical Document to Support the Central Everglades Planning Project Everglades Agricultural Area A-2 Reservoir Water Reservation." We recognize that the Draft Report provides the basis for South Florida Water Management District's (SFWMD) upcoming reservation rule development, and we look forward to participating in that process.

The Lake Worth Drainage District (LWDD) has long been a supporter of the Comprehensive Everglades Restoration Plan (CERP), including the construction of a reservoir south of Lake Okeechobee. In 2000, Congress intended for the project to reduce estuary discharges, provide water for the environment and water supply for municipal and agricultural uses. The Post Authorization Change Report (PARC) recognized these objectives through the proposal for additional dynamic reservoir storage in the Central and Southern Florida Project (C&SF Project).

As you are aware, the operation of Lake Okeechobee is integral to the function of the C&SF Project. Its operation affects numerous stakeholders across south Florida, including a broad range of both environmental and economic interests. While it must be managed to address critical ecological functions within the Lake itself, it also relies upon dynamic storage to meet flood control, water supply and environmental needs within the C&SF Project. The relationship between Lake Okeechobee and the EAA A-2 Reservoir is undeniable, and as a result, operations of both the structures surrounding the Lake and the A-2 Reservoir must be integrated to meet the water resource objectives established in CERP. However, there is very little information in the Draft Report regarding the EAA A-2 Reservoir projects operations, particularly as it relates to the function and operation of Lake Okeechobee.

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Therefore, it is not possible to make detailed technical comments at this time. Given that the current operating schedule (LORS 08) is not expected to be replaced until at least 2022 (LOSOM) and the EAA A-2 Reservoir is not expected to be constructed until at least 2027, adopting a prospective water reservation now may be premature.

LWDD remains committed to Everglades Restoration and we look forward to working with SFWMD and the U.S. Army Corps of Engineers to ensure that it is successfully implemented in a fashion that adheres to the legal mandates, objectives and processes established by Congress and the State of Florida. Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tommy B. Strowd', written over a horizontal line.

Tommy B. Strowd, P.E.
Executive Director / District Engineer
LAKE WORTH DRAINAGE DISTRICT

c: LWDD Board of Supervisors
Jeremy McBryan, P.E., Palm Beach County