

June 26, 2020

Toni Edwards
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Applied Sciences Bureau/Coastal Ecosystems Section
South Florida Water Management District
3301 Gun Club Road
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Dear Ms. Edwards:

This letter offers comment on the draft *Technical Document to Support the Central Everglades Planning Project Everglades Agricultural Area A-2 Reservoir Water Reservation*, dated May, 2020. In summary, the technical document does an excellent job laying the foundation for a determination that the water provided by the Everglades Agricultural Area Reservoir protects fish and wildlife. What needs further elaboration, in our opinion, is the quantity of water to be reserved, and protecting the upstream contributions to that water.

Section 4 of the draft document does an excellent job of laying the factual predicate for reservations. Section 4.1 documents the hydrologic changes expected from the Central Everglades Planning Project, which includes the Everglades Agricultural Area Reservoir. Section 4.2 documents the expected change to habitats resulting from the hydrologic changes. Section 4.3 documents the expected effects of changes to hydrology and habitat on fish and wildlife. Each section uses the most up-to-date tools and metrics, offering the requisite evidence from the scientific literature. The document builds the argument both logically and methodically that the water provided by the Central Everglades Project is protective of fish and wildlife. While it is certainly possible to augment the information and elaborate on the linkages, Section 4 of the draft document concisely offers the essential facts and analyses that would form the basis for a reservation, as discussed in Section 2.

Section 5 is of particular importance, since it specifies the quantify of water to be reserved. Figure 5.2 is the distribution of annual flows from the reservoir, and is important because that is the water upon which the benefits described in Sections 3 and 4 are derived. Yet the document is not explicit on whether Figure 5.2 is quantity of water for the proposed reservation.

Also, Section 5.3.1, entitled "Upstream Watershed Evaluations" appears incomplete. For example, Slide 30 of the May 29, 2020 presentation to the Peer

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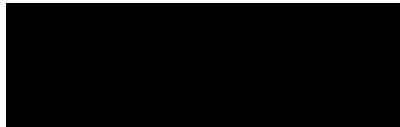
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Review committee shows a Lake Okeechobee stage duration curve that would indicate that Lake Okeechobee is a significant source of water for the reservoir. It is unclear if that water is also protected. This is in contrast to the Kissimmee River Reservations process, where the SFWMD specifically recognized that flows in the Kissimmee River depended on upstream watershed contributions and made reservations for the upstream lakes as well as the river.

In summary, the technical document does an excellent job laying the foundation for a determination that the water provided by the Everglades Agricultural Area Reservoir protects fish and wildlife. What needs further elaboration, in our opinion, is the quantity of water to be reserved, and protecting the upstream contributions of that water.

Sincerely,



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Senior Scientist
The Everglades Foundation

Cc: Shannon Estenoz
Melodie Naja, Ph.D.