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August 27, 2020

Don Medellin  
Project Manager  
South Florida Water Management District  
3301 Gun Club Rd.  
West Palm Beach, FL 33401

**Subject: EAA A-2 Reservoir Water Reservation**

Dear Mr. Medellin:

The Lake Worth Drainage District (LWDD) thanks you for the opportunity to provide comments on the Water Reservations for the EAA A-2 Reservoir. The central role that this proposed facility plays in the restoration of the Everglades also has serious implications for the northern coastal estuaries, Lake Okeechobee, the Lake Okeechobee Service Area and the Lower East Coast of Florida.

LWDD is a single-purpose Special Taxing District created by the Florida Legislature in 1915 to manage water resources in southeastern Palm Beach County for Flood Control and Water Supply purposes. This mission requires that we rely heavily upon the regional water resource network of the federally authorized Central & Southern Florida Project for Flood Control and Other purposes (C&SF Project) for both discharge of excess water during wet periods and as a source of regional supplemental water during dry periods. Maintenance of the appropriate groundwater elevations in our region are critical to protecting the surficial aquifers in southeastern Palm Beach County and the public water supply utilities that rely upon them, from the impacts of Saltwater Intrusion.

While our primary source of supplemental water is Water Conservation Area No. 1 (Arthur R. Marshall Loxahatchee National Wildlife Refuge), the U.S. Army Corps of Engineers (USACE) Water Control Plan for Water Conservation Areas, Everglades National Park, and ENP-South Dade Conveyance System requires that under certain conditions, no supplemental water can be withdrawn unless it is preceded by an equivalent volume of water brought in from Lake Okeechobee. This situation inextricably connects the supplemental water needs of southeastern Palm Beach County to Lake Okeechobee – particularly during drought conditions. Therefore, any proposed alteration in the water resource responses associated with Lake Okeechobee are of particular concern – especially with regard to potential impacts to the water supply objectives of the Lake.

The regional modeling used to prepare the Draft Technical Document to support the EAA A-2 Reservoir water reservation assumed the 2008 Lake Okeechobee Regulation Schedule (LORS2008). The results of the technical analysis are dependent on Lake Okeechobee operations consistent with LORS2008. However, LORS2008 is expected to be superseded by a new operating schedule (i.e. LOSOM) by 2022 and the EAA A-2 Reservoir is not expected to be constructed until 2027 at the earliest. Furthermore, it is not clear how the Savings Clause analysis will be affected by this discrepancy. These facts introduce additional questions on the appropriateness and validity of the technical analysis and leads to the belief that the proposed water reservation may be premature.

It is not clear if and how the EAA A-2 Reservoir reduces the likelihood of water shortage conditions in South Florida that have resulted from implementation of LORS2008, which was intended to be temporary and was implemented to reduce Herbert Hoover Dike failure risk, or if and how the EAA A-2 Reservoir increases the likelihood of meeting water supply requirements for existing permitted users, particularly along the Lower East Coast. How does SFWMD intend to meet their legal obligation to protect existing legal users and provide for other water related needs now and in the future? Furthermore, the uncertainty associated with this proposal places a significant risk to water supply users across south Florida.

Due to the lack of an operational plan for the EAA A-2 Reservoir that aligns with the information provided in the Draft Technical Document, it is not clear if and how the multi-purpose operations of the EAA A-2 Reservoir, as envisioned in CERP, will occur.

It is not clear if and how the EAA A-2 Reservoir reduces the likelihood of water shortage conditions in South Florida that have resulted from implementation of LORS2008, which was intended to be temporary and was implemented to reduce Herbert Hoover Dike failure risk, or if and how the EAA A-2 Reservoir increases the likelihood of meeting water supply requirements for existing permitted users. How does SFWMD intend to meet their legal obligation to protect existing legal users and provide for other water related needs now and in the future?

Thank you again for the opportunity to comment on this important CERP effort.

Sincerely,

A handwritten signature in black 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