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June 26, 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: Palm Beach County 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 comment on the subject document related to an important Comprehensive Everglades Restoration Plan (CERP) project. Palm Beach County (County) supports the proposed Everglades Agricultural Area (EAA) A-2 Reservoir project and other state and federal efforts to restore ecosystems throughout the Central and Southern Florida (C&SF) project's water management system. The County, like many South Florida governments, relies on the C&SF system to protect its citizens from flooding and to protect public water supply from depletion and salt water intrusion.

As communicated previously, the original June 12, 2020 deadline for comments on the subject document and related peer review materials was too short to ensure adequate public engagement and enable meaningful input from stakeholders and affected parties and appeared inconsistent with previous South Florida Water Management District (SFWMD) water reservation public review timelines. The County appreciates SFWMD extending the deadline to June 26, 2020.

Additional time was needed to understand the nuances of the proposed water reservation, the complexities of the regional modeling and assumptions, how modeling information was translated during development of the Technical Document, how the water reservation will affect and/or will be affected by the ongoing Lake Okeechobee System Operating Manual (LOSOM) effort, and the potential implications to water supply reliability and existing permitted water users.

Unfortunately, the lack of sufficient information provided in the subject Draft Technical Document makes it difficult for the County to provide extensive comments at this time. Below are questions or concerns based on the information provided.



1. 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). As such, the results of the technical analysis are integral to and dependent on Lake Okeechobee operations consistent with LORS2008. Yet 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. 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.
2. The relationship between the technical analysis, the subsequent water reservation rule and LOSOM is not clear. Please explain how LOSOM will affect the information in the Draft Technical Document, the subsequent water reservation rule and the timeline for rule development?
3. 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.
4. Due to the lack of an operational plan for the EAA A-2 Reservoir, there is a large amount of uncertainty regarding project operations that could result in undocumented effects to the environment and water supply reliability.
5. Per the Draft Technical Document, releases from the EAA A-2 Reservoir via Structure S-628 to the Miami and North New River Canals may occur periodically and are not reserved for fish and wildlife. If actual EAA A-2 Reservoir operations result in little to no releases from S-628, what assurances do existing and future permitted users have that their water supply reliability will not be impacted?
6. 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?

The County will continue to monitor the EAA A-2 Reservoir water reservation rule development process and looks forward to receiving additional information to assist in increasing the understanding of the technical basis for the water reservation.

Sincerely,

Jeremy McBryan, PE, CFM
County Water Resources Manager

cc: Patrick Rutter, Assistant County Administrator