

May 13, 2020

Re: Public Comment – Not sure if I will be able to call in during the time for Elected Officials so am sending my written comments today!

Dear SFWMD Board Members,

At our April Clewiston City Commission Meeting we unanimously approved adding our name and support to the protection of Florida's critical water supply in Lake Okeechobee. As a fishing and farming town our well-being and future are tied irrevocably to the Lake's water as it is for all those who joined in on the letter.

In part, the letter stated our position in regards to the Water Resources Development Act ("WRDA 2000") that authorized an ecological restoration plan for America's Everglades ecosystem. Today, we know it as the Comprehensive Everglades Restoration Plan ("CERP"). CERP directed the Corps and State of Florida, as the local sponsor, to restore our natural environment, while providing for our water related needs, including water supply for people and businesses. CERP was historic! It passed after the State of Florida, the Corps, and diverse businesses, municipalities, farmers, and environmental groups spent nearly a decade developing it. That is why we supported it then and why we continue to support CERP and a critical feature of WRDA 2000 – the Savings Clause.

As you each know, the Savings Clause directs the Corps to protect the water supply that was in place in 2000, as it restores the environment. When Congress passed WRDA 2000, it included Lake Okeechobee as part of WRDA 2000. This was an essential element then, and for us it continues to be of importance for our future well-being. Twenty (20) years is a blink of an eye when it comes to the matters of CERP projects and water supply – we must maintain the foundation that has brought us here thus far in WRDA 2000. Please do not let others diminish our importance as a rural partner in all things that concern Lake Okeechobee's water supply protections in the Savings Clause.

As someone who looks out over the Lake just about every day, I am acutely aware of its treasured role for us all and the protection provided us in WRDA 2000 must continue, particularly since the State's investments on shoring up the Herbert Hoover Dike must not be ignored. Attached is the District's graphic that I use as a guide on Lake O water levels and impacts thereof.

Please support the protection of Florida's existing and future water supply by joining your voices to ours on requesting that the WRDA 2000 Savings Clause be honored by Congress.

Respectfully,

Mali Soto Gardner, Mayor

City of Clewiston

p.s. Look forward to the rest of the board member's visit to town once we find our new normal.



SFWMD
infographic_lake_ok

Impacts of Operating Lake Okeechobee at Lower Water Levels

The U.S. Army Corps of Engineers implements the lake's regulation schedule for flood control, navigation, water supply and the environment. The federal regulation schedule prescribes operational action to manage Lake Okeechobee's water levels between 10.5' and 17.25'. The purpose of these operations range from the release of water for the protection of communities (during the wet season) to the conservation of water for water supply to South Florida (during the dry season). Below is a breakdown of the impacts of operating the lake as water levels are lowered.

17.25' – 15.5'

Upper operational band for lake's water levels. Above 15.5', the lake water is against the Herbert Hoover Dike, surrounding the lake. As water levels increase, releases are prescribed to protect communities because the integrity of the dike becomes a concern.

15.5' – 12.5'

Ecologically preferred operating band for water levels in the lake, which provides depths that facilitate fisheries habitat and the growth of desirable aquatic vegetation. Within this operational band, water managers balance flood control, water supply and environmental needs. Implementation of the Comprehensive Everglades Restoration Plan (CERP) will significantly enhance water management operational flexibility.

12.5' – 10.5'

When the lake falls into the water shortage band, the South Florida Water Management District (SFWMD) orders water use cutbacks and mandatory restrictions. Water deliveries to all are reduced.

Ecological impacts can occur when the lake's water level goes below 11' for more than 80 days – a violation of the Lake Okeechobee minimum flow and minimum water level rule.

Decrease in environmental water deliveries to the Caloosahatchee Estuary.

Difficulty delivering water supply to the Seminole Tribe of Florida's Big Cypress and Brighton Reservations.

Lake Okeechobee lock operations discontinued along northern shore due to safety concerns.

Navigation restrictions for the Okeechobee Waterway rim canal due to shallow water make lake crossing unsafe for large boats with deeper drafts. Reduced lock operations along C-43 and C-44 canals.

Impact to crops in the Lake Okeechobee and Lower East Coast service areas, potentially causing impact to nationwide crop prices and domestic availability.

Shallow water limits recreational and commercial fishing and impacts small businesses such as marinas.

10.5' – 9.5'

Severe reduction in capability to deliver water south of the lake for any beneficial purpose.

Increased risk of permanently compromising freshwater supplies in wellfields due to saltwater intrusion in urban coastal areas, affecting health and safety.

City of Okeechobee's withdrawal for water supply needs is compromised, impacting public health and safety.

Primary water supply source for the City of West Palm Beach's Grassy Water Preserve no longer available, affecting 100,000 residents.

SFWMD orders increased water shortage restrictions on communities. Restrictions negatively impact businesses and a population of more than 6 million south of the lake and coastal communities, stretching to Miami-Dade County and the Florida Keys.

Wildlife and endangered species survival affected as water needs for Water Conservation Areas (WCAs) no longer met.

9.5' – 8.0'

Saltwater intrusion within the Caloosahatchee River (C-43) precludes lock operations and compromises Lee County water treatment plant. Navigation from Lake Okeechobee is no longer available.

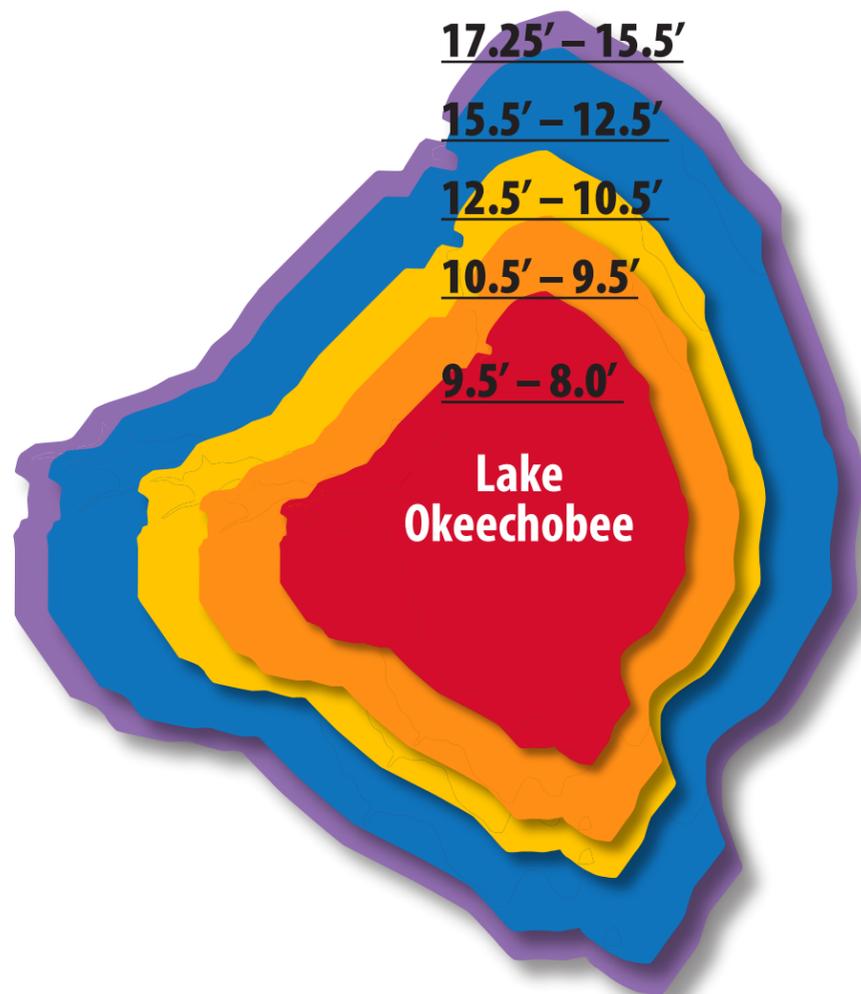
Pump stations in S-351, S-352 and S-354 on rim of lake are dry and inoperable, no longer moving water out of the lake.

Everglades Stormwater Treatment Areas no longer receive water to sustain wetland plants that remove nutrients from the water. Costly restoration infrastructure critical to sending water south is compromised.

The Everglades are at high risk for muck fires, permanently destroying Everglades habitat and threatening human life.

The District is unable to deliver the Seminole Tribe of Florida its allotted water entitlement at both the Big Cypress and Brighton Reservations.

In the event of a drought, the majority of Lake Okeechobee – the second largest freshwater lake wholly within the U.S. – could become a dry lakebed.



SOLUTIONS

The following actions need to be taken to reduce operational constraints within the lake and water management system. Increased operational flexibility will improve the capability to reduce estuary releases while ensuring environmental restoration and providing water supply for the region.

- Expedite rehabilitation of the Herbert Hoover Dike and the restudy of Lake Okeechobee's operating schedule.
- Federal government contributes its share of funding, including 50-50 cost share with SFWMD for critical restoration projects.
- Complete ongoing and planned restoration projects such as the C-43 Reservoir, C-44 Reservoir, Everglades Agricultural Area Reservoir, the Central Everglades Planning Project and the Lake Okeechobee Watershed Restoration Project.
- Continue to investigate and implement innovative technologies, alternative storage and protection measures such as Emergency Estuary Protection Wells and Dispersed Water Management.

Byrd, Rosie

From: noreply@granicusideas.com
Sent: Tuesday, May 12, 2020 5:47 PM
To: Byrd, Rosie; Fretwell, Angela
Subject: New eComment for MAY 2020 GOVERNING BOARD MEETING

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New eComment for MAY 2020 GOVERNING BOARD MEETING

Brenda Monse submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: My name is Brenda Monse, I have lived in South Florida my entire 61 years. I teach 4th grade and discuss chronic problems with our water supply throughout history and how it impacts people & our ecosystems, especially the Everglades. We must devote the time, resources, & money to support all projects. Let's do the right thing to help develop a system for the protection of all living things.

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New eComment for MAY 2020 GOVERNING BOARD MEETING

Debra Guendelsberger submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: The water level needs to be monitored and protected at healthy levels for land, plants, wildlife and humans, but response to this dilemma regarding water issues must not stop with this question. The water level of Lake O will not solve the mismanagement, degradation and increased demand that have taken a toll on the system. There is no easy fix; hard questions must be answered and if they aren't, our water problems will get more severe. Nitrogen and phosphorus have no place in our water and they lead to algae blooms. So, do you want sugar or water? Personally, I can live without sugar but not without water. If the choice is water, then sugar needs to go once and for all. If farming/agriculture is allowed in areas that do not interfere with clean water processes, then it needs to be organic farming. Further, there's no place for cattle excrement in water. The Everglades Restoration project needs to be revved up and interference from special interest groups manipulating political representatives must not be tolerated. Every effort to move clean water southward is the only hope to rejuvenate a dying Everglades and secure fresh drinking water for South Florida. A healthy Everglades is the best way to stave off saltwater intrusion along with the discontinuation of rock pit mining. Of course, it would be helpful and should be mandated that local governments account for water demand vs. actual water supply and plan sustainable cities to encourage citizens to not waste water by planting xeriscape and native gardens and discontinuing the use of chemical spraying, thereby not only saving water but keeping it clean as it heads to the bay and ocean as runoff or filters into the ground. The factors involved in this water situation are myriad and interconnected, therefore the resolution must be all encompassing. Humans created this problem and we must correct it. It will take time to restore the system so we better start now. All those concerned need the SFWMD to see the big picture clearly and not just a piece of it and not pit interests against each other. Backing from the SFWMD to solve complicated water issues sends a message to entities that would squander and /or pollute water for their own interests. At some point, the district and residents must decide what is truly vital and what is not with reference to water needs. Over population, over development, destructive lifestyle, insensitive habits etc. must be

reigned in if we are to insure the future of water. It is our life blood but if we do not take care of it, it will not be here for us. Thank you.

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Jeremy McBryan submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: Please see the Palm Beach County letter dated May 6, 2020 at:
http://discover.pbcgov.org/wrtf/PDF/Documents/PBC_to_USACE_SavingsClause_06May2020.pdf

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Official Electronic Letterhead

May 6, 2020

Via Email: Andrew.D.Kelly@usace.army.mil

Colonel Andrew Kelly
District Commander
U.S. Army Corps of Engineers, Jacksonville District
701 San Marco Boulevard
Jacksonville, FL 32207

Dear Colonel Kelly,

**Subject: Request to Reconsider Policy Decision to Not Apply the
WRDA2000 Savings Clause to Lake Okeechobee
Operations**

Palm Beach County (County) supports efforts by the U.S. Army Corps of Engineers (Corps) to re-evaluate Lake Okeechobee operations through the Lake Okeechobee System Operating Manual process and to restore ecosystems throughout the Central and Southern Florida (C&SF) 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.

I write to you during this unprecedented global emergency requesting reconsideration of a recent Corps policy decision to not apply a critical element of the Water Resources Development Act of 2000 (WRDA2000) intended to protect flood protection and water supply, commonly referred to as the Savings Clause (Section 601(h)(5) of Public Law 106-541).

In 2000, Congress passed WRDA2000 authorizing an ecological restoration plan for America's Everglades ecosystem. Today, we know it as the Comprehensive Everglades Restoration Plan or CERP. CERP directed the Corps and State of Florida, as the local sponsor, to restore our natural environment, *while* providing for our water-related needs, including water supply and flood protection for people and businesses. CERP was historic. It was passed by Congress after the State of Florida, the Corps, and diverse businesses, municipalities, farmers, and environmental groups spent nearly a decade developing it. The County supported the passage of CERP and continues to be committed to its success.

The theme of CERP was to "make the water pie bigger" through both operational modifications and new infrastructure to store water for both the environment and people. To secure successful passage, WRDA2000 established reciprocal protections that reserved water specifically identified for ecosystem restoration *and* preserved the "existing" levels of service for flood protection



Colonel Andrew Kelly
May 6, 2020
Page 2 of 2

and water supply, which must be applied throughout the decades of CERP implementation. The Savings Clause provides that the Corps must preserve the levels of service for flood protection and quantity of water available for urban and agricultural use that were in existence *on the date of enactment of the Act*, i.e., the year 2000.

The management of Lake Okeechobee was an integral part of WRDA2000 when it was passed by Congress and continues to be an essential element to ensure the C&SF water management system protects public water supply. However, in December 2019, the County learned of the Corps' policy decision that Lake Okeechobee operations are not part of WRDA2000 and therefore, the water supply protections in the Savings Clause do not apply.

This decision by the Corps, 20 years after Congress provided direction, is contrary to the language and intent of WRDA2000, does not protect the legal uses of water in place in 2000 and makes permanent the diminished water supply that resulted from the temporary lowering of Lake Okeechobee to repair the Herbert Hoover Dike.

The Corps' tactics to modify the C&SF system in pursuit of ecosystem restoration are not boundless. The Corps must follow the laws enacted by Congress. In enacting the Savings Clause, Congress acknowledged that state and local entities cannot support ecosystem restoration at the expense of communities that rely on the C&SF system for flood protection and public water supply. In addition, when the Corps makes a policy decision to avoid applying established law, the Corps leaves stakeholders in a state of unpredictability, and unpredictability undermines support for restoration.

It is imperative that water supply provided by Lake Okeechobee be preserved and protected to ensure the health and safety of the more than 1.5 million residents of Palm Beach County. Please reconsider your decision to not apply the WRDA2000 Savings Clause to Lake Okeechobee operations.

Sincerely,

Dave Kerner
Mayor, Palm Beach County

cc: Major General Scott A. Spellman, U.S. Army Corps of Engineers
Lt. Colonel Todd Polk, U.S. Army Corps of Engineers
Drew Bartlett, South Florida Water Management District
Governing Board Members, South Florida Water Management District
Members, Palm Beach County Board of County Commissioners
Verdenia Baker, County Administrator
Jeremy McBryan, County Water Resources Manager

Byrd, Rosie

From: noreply@granicusideas.com
Sent: Wednesday, May 13, 2020 8:30 AM
To: Byrd, Rosie; Fretwell, Angela
Subject: New eComment for MAY 2020 GOVERNING BOARD MEETING

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New eComment for MAY 2020 GOVERNING BOARD MEETING

Irwin Wolf submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: you must protect our water system including the levels of Lake Okachobee for today, and our future generations and of course the wildlife that depend on it

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New eComment for MAY 2020 GOVERNING BOARD MEETING

Gustavo Rodriguez submitted a new eComment.

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Item: 7. General Public Comment

eComment: Stop sugar cane contamination!!

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Douglas Bent submitted a new eComment.

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Item: 7. General Public Comment

eComment: I live near the intercoastal waterway and have a boat slip in Rocky Point Estates, Stuart Florida. I have experienced many days of blue green algae in our waterways and have experienced several lost summers. In 2016 during an unprecedented algae bloom I experienced difficulty breathing for several weeks from a upper respiratory infection. The pollution in our town from this was discusting and shocking at how a community of people who have been acknowledging that this pollution existed for many years and a plea for help in the governing bodies to acknowledge it and offer a change. Because of the Covid19 outbreak I fear that if we have another algae bloom this summer and I catch the dreaded coronavirus that I would not be able to survive. Question? What are you doing differently today to prevent a Algae Bloom because of this pandemic?

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Dawn Larkin submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: I am concerned that the low levels of Lake Okeechobee endanger our water supply and threaten the ecological health of the Everglades and will affect South Florida.

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Tim Collins submitted a new eComment.

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Item: 7. General Public Comment

eComment: As a Waterman on the St Lucie and Indian Rivers, we must maintain low levels of water in Lake Okeechobee. With the corona virus devastating local business we can not afford a summer of Blue/Green algae that would accompany large water releases after a Tropical storm or Hurricane.

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Skip Perez submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: Low water levels in Lake Okeechobee are bad public policy. Please consider what's best for ALL the people not just wealthy special interests. Thank you, -Skip Perez.

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Paul Tsang submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: Please STOP reducing the water levels in Lk Okeechobee killing our natural resources in favor of Big Sugar / Big Industry concerns both of which contribute to early death from heart disease, obesity, strokes & cancer in the USA !!!!

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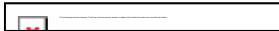
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Mary Simonds submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: My name is Mary Ann Simonds. I live in Wellington, FL and by profession I am an ecologist. Having worked in sustainable development in various parts of the country it is rather shocking that a here in my home state so little attention is paid to the valuable resource of water, soil and air. Having to fight for clean water seems absurd as you would think humans would value a resource we cannot live without. As more people continue to move into South Florida, water management is critical. There is not enough water to sustain the current population let alone an increase in people. Lake Okeechobee needs to be managed first for drinking water and second for agriculture.

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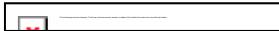
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New eComment for MAY 2020 GOVERNING BOARD MEETING

Linda Campbell submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: Lake Okeechobee is the "liquid heart" of our state's water supply. The lake helps to provide clean water to millions in So. Florida, helps to maintain the everglades and the wildlife that live there. The lake needs to be protected and monitored for healthy levels. Florida needs to control it's ever expanding, uncontrolled growth. Marshlands that work in connection with the lake and the everglades to filter our drinking water are being filled in and developed into areas of urban sprawl. These actions are rubberstamped by our Florida Department of Environmental Protection whose name does not reflect it's actions or purpose. Florida is catering to builders and developers to the demise of our natural resources and clean drinking water.

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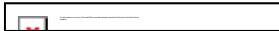
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Julie Shterenvaser submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: Water supplies are critical to life itself, and to the continued viability of the aquifers that supply fresh water to wells, such as in the more rural parts of south Florida. Please consider this and do not reduce water levels in Lake Okeechobee in order to prop up businesses in close proximity to the lake. Our lives and that of our livestock depend on the water levels being maintained. Thank you.

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Eve Samples submitted a new eComment.

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Item: 7. General Public Comment

eComment: The Army Corps of Engineers has rightly stated the so-called "savings clause" should not apply to the Lake Okeechobee System Operating Manual. However, some members of Congress are working to make it a factor in LOSOM — even though doing so would result in toxic lake discharge to the northern estuaries, and harm the ecology of Lake Okeechobee, the Everglades and Florida Bay. What is the South Florida Water Management District (staff and Governing Board) doing to make sure the savings clause isn't applied to LOSOM? We can't honor these special-interest driven, 20-year-old water promises if we want cleaner water for the future of Florida. In the name of human health, it's time to reevaluate these priorities.

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New eComment for MAY 2020 GOVERNING BOARD MEETING

Tommy Strowd submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 7. General Public Comment

eComment: Please see the LWDD letter submitted May 13, 2020.

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Attorney
Mark A. Perry, P.A.

May 13, 2020

Chauncey Goss
Governing Board Chairman
South Florida Water Management District
3301 Gun Club Rd.
West Palm Beach, Florida 33301

**Subject: Public Comment - Agenda Item #7; General Public Comment –
CERP Savings Clause**

Dear Chairman Goss:

As you are aware the U.S. Army Corps of Engineers (USACE) is developing a new Regulation Schedule for Lake Okeechobee, known as the Lake Okeechobee System Operating Manual (LOSOM). The purpose of this schedule is to determine new operational criteria that will take into consideration the significant improvements to the structural integrity of the Herbert Hoover Dike by the USACE.

One recent point of controversy centers on the applicability of the 'Savings Clause' to Lake Okeechobee. The Savings Clause was an integral part of the 2000 Congressional Authorization for the Comprehensive Everglades Restoration Plan (CERP). There are several reasons that point to the relevance of the Savings Clause in this instance.

Lake Okeechobee has often been referred to as the "Liquid Heart of South Florida", primarily because its hydrologic influence is felt across much of the southern portion of the State. In the natural hydrologic system, the Lake spilled over its southern shoreline and contributed large quantities of water to the expansive Everglades, which slowly and consistently flowed through the shallow marshes into Florida Bay. In today's hydrologic system, Lake Okeechobee has been developed over many decades into a massive water reservoir by the Central and Southern Florida Project (C&SF Project). The Lake now serves both flood control and a wide range of water resource needs. These include the ecology of the Lake itself, the Everglades, coastal estuaries, agricultural operations, tribal interests, navigation, and urban constituencies across South Florida. The Lake has enormous influence over this broad geographic area, and therefore cannot be effectively separated from the hydrologic function of the C&SF Project at large.

The anticipated development schedule for LOSOM coincides with the construction schedules for the C-43 and C-44 CERP reservoirs. It is understood that these new CERP facilities will be in place and functional around the time that LOSOM is implemented. It is uncontested that the

new regional water created by these reservoirs and the associated water storage capacities will have an influence on Lake Okeechobee operations, and vice versa. It should be obvious that the operations of these new CERP facilities must be coordinated with the operation of Lake Okeechobee to achieve the regional benefits anticipated in CERP.

A System-wide Operating Manual (SOM) was originally envisioned in the proposed implementation of CERP through a series of Programmatic Regulations developed by the USACE in 2003. Prior to this, the documentation of the C&SF Project operations was divided into sub-regional Master Water Control Manuals, which established and documented the operations of individual C&SF Project components. The purpose of the System wide Operating Manual was to coordinate the regional 'system-wide' operations with the CERP project-level operating plans; thus coordinating the operations of each individual project in a regional context so as to achieve the regional hydrologic benefits anticipated by CERP. In the context of LOSOM, the System wide plan should then coordinate operations of Lake Okeechobee with the project level operations of the C-43 and C-44 reservoirs.

Since LOSOM coordinates the operations of the Lake with the reservoirs associated with the coastal estuaries, it must consider regional limitations established by CERP as it assures the regional benefits are properly accrued. In this context, the CERP Savings Clause must be addressed in LOSOM.

Senate Bill 2797 of the "RESTORING THE EVERGLADES, AN AMERICAN LEGACY ACT", July 2000, defined the Savings Clause provisions:

"Savings Clause. Subsection (h)(5) requires the Secretary to ensure that implementation of the Plan does not cause substantial adverse impacts on existing legal uses of water, including water allocated to the Seminole Tribe of Florida as codified under Federal and State law, the Miccosukee Tribe of Indians of Florida, water for Everglades National Park, water for the preservation of fish and wildlife in the natural system, agricultural water supply and other legal uses as of the date of enactment of this bill."

It further stated...

"Subsection (h)(5)(A) addresses the rights of existing legal water users. The subsection states that the Secretary shall ensure that the implementation of the Plan, including physical or operational modifications to the C&SF Project, does not cause significant adverse impact on existing legal water users."

...and finally,...

"Subsection (h)(5)(B) establishes a condition upon project implementation that prohibits elimination of existing legal sources of water due to Plan implementation until a new source of water supply of comparable quantity and quality is available to replace the water to be lost."

Clearly, these protections were intended to avoid future impacts to the broad range of beneficial water uses that were in place at the time of CERP authorization. Since 1915, the Lake Worth Drainage District has managed a sub-regional water resource management system located in southeastern Palm Beach County for the benefit of flood control and water supply. Like most urban and agricultural communities along the Lower East Coast of Florida, we rely in part on Lake Okeechobee water as a critical back-up during extreme dry periods or droughts. The Savings Clause protections are an important factor in the future availability of water for urban, agricultural, and environmental water needs as CERP is implemented over the coming years.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Strowd', with a horizontal line drawn through the middle of the letters.

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

- c. Drew Bartlett, Executive Director, SFWMD
SFWMD Governing Board Members
Col. Andrew Kelley, U.S. Army Corps of Engineers, Jacksonville District
John Mitnick, P.E., SFWMD

Byrd, Rosie

From: noreply@granicusideas.com
Sent: Wednesday, May 13, 2020 4:57 PM
To: Byrd, Rosie; Fretwell, Angela
Subject: New eComment for MAY 2020 GOVERNING BOARD MEETING

[Please remember, this is an external email]



New eComment for MAY 2020 GOVERNING BOARD MEETING

Eve Samples submitted a new eComment.

Meeting: MAY 2020 GOVERNING BOARD MEETING

Item: 28. General Public Comment

eComment: If the EAA Reservoir construction is delayed by the Army Corps due to the "new start" requirement, Friends of the Everglades asks that SFWMD and the state use that delay to improve the project design so it cleans more water before sending it south. The depth of the reservoir remains a significant concern, and independent science has indicated more land is needed for Stormwater Treatment Areas.

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