



Everglades Coalition

1000 Friends of Florida
Arthur R. Marshall Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon of the Western Everglades
Audubon Society of the Everglades
Backcountry Fly Fishers of Naples
Caloosahatchee River Citizens Association/
Riverwatch
Center for Biological Diversity
Clean Water Action
Conservancy of Southwest Florida
Defenders of Wildlife
"Ding" Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
Florida Conservation Voters Education Fund
Florida Defenders of the Environment
Florida Keys Environmental Fund
Florida Native Plant Society
Florida Oceanographic Society
Friends of the Arthur R. Marshall
Loxahatchee National Wildlife Refuge
Friends of the Everglades
Hendry-Glades Audubon Society
International Dark-Sky Association,
FL Chapter
Izaak Walton League of America
Izaak Walton League Florida Division
Izaak Walton League Florida Keys Chapter
Izaak Walton League Mangrove Chapter
Last Stand
League of Women Voters of Florida
Loxahatchee River Coalition
Martin County Conservation Alliance
Miami Pine Rocklands Coalition
Miami Waterkeeper
National Audubon Society
National Parks Conservation Association
National Wildlife Refuge Association
Natural Resources Defense Council
North Carolina Outward Bound School
Ocean Research & Conservation Association
Reef Relief
Sanibel-Captiva Conservation Foundation
Save It Now, Glades!
Sierra Club
Sierra Club Florida Chapter
Sierra Club Broward Group
Sierra Club Calusa Group
Sierra Club Central Florida Group
Sierra Club Loxahatchee Group
Sierra Club Miami Group
Snook and Gamefish Foundation
South Florida Audubon Society
Southern Alliance for Clean Energy
The Florida Wildlife Federation
The Institute for Regional Conservation
The National Wildlife Federation
The Urban Environment League of
Greater Miami

January 16, 2018

Governor Rick Scott
State of Florida
The Capitol
400 S. Monroe Street
Tallahassee, FL 32399-0001

Re: Everglades Agricultural Area Reservoir

Dear Governor Scott:

On behalf of the 62 member organizations of the Everglades Coalition committed to the protection and restoration of America's Everglades, we respectfully submit the following concerns and recommendations related to implementation of Florida Statute 373.4598 (2017 Senate Bill 10), which you signed into law in May 2017. Our member organizations have remained engaged through the rigorous schedule of public meetings that have taken place since the Everglades Agricultural Area (EAA) reservoir planning kickoff in late October of this year. We commend South Florida Water Management District (District) staff for the tremendous workload being undertaken to meet the ecological goals and project timelines outlined in the legislation in such an abbreviated time period.

In its mandated January 9th report to the legislature on the status of planning the Everglades Agricultural Area (EAA) Reservoir, the District has failed to configure a project footprint that can store and clean the water necessary to provide Everglades National Park and Florida Bay the freshwater flows the ecosystem requires. The District's report does not represent the optimum configuration of a plan that will maximize reduction of estuary discharges.

The Everglades Coalition urges you to direct the District to model alternative configurations that consider additional state-owned lands, including lands currently under lease, and made available for use in Florida Statute 373.4598. The bill signed into law in May of last year requires analysis of "the optimal configuration", but to date the District has only offered options that would squeeze water storage into an industrial-scale smaller footprint with massive walls and without adequate water quality treatment for conveyance south. The District has presented alternatives to construct water storage and treatment based solely on land in state ownership within the A-1 and A-2 parcels and the A-2 expansion area.

The identification of the optimal reservoir configuration, as required by Florida Statute 373.4598 compels the District to go beyond the A-1 and A-2 lands to identify the necessary acreage and configuration of storage and treatment that best meets

Committed to full protection and restoration of America's Everglades

ecological goals in the most cost-effective manner. This additional necessary acreage, per Florida Statute 373.4598, can be made available through the termination of state leases whether or not willing sellers of privately held land come forth. The footprint of the project can be further optimized by land swaps using both terminated leases and lands in the District's surplus database.

We further urge that the design not impact the operational A-1 Flow Equalization Basin (FEB) lands which are effectively treating water quality as part of overall Restoration Strategies. Alterations to this project introduce potential delays at the Federal level. We are deeply concerned that the limited array of alternatives identified by the District thus far will result in a reservoir plan that is neither cost-effective nor likely to be approved by the U.S. Army Corps of Engineers and Congress.

The National Environmental Policy Act (NEPA) requires the consideration of a broad range of alternatives and requires decision-makers to "rigorously explore and objectively evaluate all reasonable alternatives." (40 CFR 1502.14 (a)). This analysis is considered "the heart of the environmental impact statement," and "should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public." (40 CFR 1502.14) The alternatives identified by the District thus far are very similar, are artificially constrained to only include the existing A-1 and A-2 lands, and thus fall short of the broad array of alternatives contemplated by NEPA.

Because of the failure to consider reasonable alternatives that rely on additional acreage, the analysis developed by the District fails to demonstrate whether additional acreage would result in the optimal configuration of the EAA reservoir most likely to meet federal cost-benefit analyses and the funding requirements identified in Florida Statute 373.4598. The inclusion of alternatives that incorporate additional acreage would allow an analysis of shallower storage options with greater acreage available for water quality treatment. Such an analysis is likely to increase ecosystem benefits in a more cost-effective and efficient manner.

We urge you to direct the District to model further reasonable options, including the alternative provided by the Everglades Foundation last December, which incorporate additional acreage available through the termination of state leases, so as to identify the optimal configuration for the EAA Reservoir Project. Doing so will demonstrate to the Florida Legislature and taxpayers how the state will meet the intent of Florida Statute 373.4598 to achieve the goals of water quality and storage capacity while simultaneously meeting federal cost-benefit analysis and planning process requirements. The District must identify the acreage of additional land needed to achieve this result before it is too late.

The Everglades Coalition remains fully supportive of accelerating the EAA Reservoir Project and is committed to working with the District to identify the optimal reservoir configuration to ensure the success of this critically important project.

Sincerely,



Mark Perry
Everglades Coalition Co-Chair



Michael Baldwin
Everglades Coalition Co-Chair

CC: Secretary Noah Valenstein, Florida Department of Environmental Protection
Chair Daniel O'Keefe, South Florida Water Management District Governing Board