April 10, 2006

Rebecca Weiss
U.S. Army Corps of Engineers
CESAJ-PD-ES
PO Box 4970
Jacksonville, FL 32232-0019

Dear Ms. Weiss:

On behalf of the Rivers Coalition, I submit these comments on the "Everglades Agricultural Area Storage Reservoirs draft integrated PIR/EIS." The Rivers Coalition (http://riverscoalition.org/) is composed of 44 member organizations, representing well over 200,000 Floridians, who have united to restore the health of the St. Lucie River, Indian River Lagoon, and major waterways in the region.

It is abundantly clear that significant conveyance capacity from Lake Okeechobee south to the Everglades is a critical component in CERP. Obviously, such conveyance must also provide storage, and water quality treatment, as Lake Okeechobee water is now more polluted than any water body it discharges to. Without adequate conveyance, storage and treatment facilities in the EAA, harmful releases to the St. Lucie Estuary will continue, an outcome we would find unacceptable.

Outflows from the EAA the past couple of years have been close to 2 million acre-feet. This is considerably more than the projected 360,000 acre-feet of storage envisioned for reservoirs A-1 and A-2. STA 3-4 was designed to provide about 250,000 acre-feet of annual Lake O treatment capacity, which is less than the reservoir capacity and has recently has been functionally reduced to 68,000 acre-feet in order to compensate for much higher EAA drainage flows than models predicted, and higher phosphorus in Lake waters than STA designs contemplated. By themselves, these structures appear significantly undersized.

Recent high flows throughout the system, carrying more nutrients than expected, is due in large part to the Atlantic Multi-decadal Oscillation (AMO) weather pattern. We can reasonably expect another 20 years of the AMO wet cycle. During most years of this cycle, the water management problem will be conveying excess Lake O waters to beneficial uses, and to least harm. It should be noted that the period of record used to model CERP in the SFWMM model, was also used to model the natural system in the NSM model, and almost perfectly overlays the last dry period of the AMO (1965-1994). Thus, AMO wet cycle weather patterns are severely under-explored as regards the Everglades and flows through them.

We understand that the EAA was one of the most modeled areas of CERP, but reiterate that the modeling was done for a substantially different weather pattern than we are experiencing. Thus, it appears likely that conveyance at the bottom of the system requires reexamination with the realization that we will frequently have several million additional acre-feet per year of runoff in the system.

While the additional storage capacity of reservoirs A-1 and A-2 will be beneficial, it appears more storage and treatment is needed. A flow-way south through the EAA appears the most plausible solution to adjust to this need. It should be sized to accommodate at least the 6600 cfs of the 1994 Plan 6 flow-way. If no contingency is planned, EAA reservoirs A-1 and A-2 could obstruct the Plan 6 proposal. Therefore both reservoirs should be designed in such a way that they could be efficient recipients of flow-way water.

Providing a flow-way to these and other storage and treatment facilities in the EAA, and then on to the WCA's, could assure lower East Coast water supply is maintained, provide additional EAA drainage treatment system to make up for present STA design/capacity deficiencies, increase habitat and recreational benefits, and provide a reliable method of moving Lake O waters south most of the year.

Thank you for your consideration of these comments.

Sincerely,

Leon Abood, Chairman
Rivers Coalition