

September 7, 2010

Mr. Eric Buermann, Chairman  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, FL 33406

Re: Adaptive Protocols for Lake Okeechobee Operations

Dear Chairman Buermann and Governing Board Members:

On behalf of the Southwest Florida Watershed Council, I would like to thank the Governing Board and District staff for providing us with an opportunity to comment on the Adaptive Protocols (AP) for Lake Okeechobee Operations draft document. During the past year, members of the SWF Watershed Council have been working with the District, Army Corps, and agricultural and natural system stakeholders to revise the AP document. District staff members have done an outstanding job of conducting the meetings and have been helpful throughout the revision process.

We agree that the proposed draft is an improvement compared to the previous version, which was based on the WSE lake release schedule. As modeled, the AP 5.5 run significantly reduces the number of days during the period of record where salinities exceed levels that are damaging to tapegrass in the Caloosahatchee Estuary; however, we still feel that it falls short of protecting the Caloosahatchee Estuary. In fact, the proposed AP 5.5 run reduces flows to the Caloosahatchee Estuary to "significant harm" levels, when consumptive users in the Lake Okeechobee Service Area will be receiving 100% of their demand. It is projected that the Caloosahatchee Estuary will experience significant harm 1,902 days (equivalent to ~5yrs) during the period of record, with 818 days of MFL violation-level releases and 1,087 days of 0 releases at the same time consumptive users would be receiving 100% of their allocation. As a result, the Southwest Florida Watershed Council cannot support any AP scenario that unilaterally cuts off flows to the Caloosahatchee River and Estuary while other users are getting 100% of their allocation.

The purview of the AP working group was to identify opportunities for win/win or win/neutral outcomes. However, when one stakeholder group

is put in a position of great disadvantage, compared to other stakeholders, incremental changes that provide little benefit still offer little relief. Instead of codifying the inequity between permitted users and water supply for the environment in the AP document, the policies that promoted this inequity need to be addressed by the Governing Board before finalizing and adopting the revised AP document.

Thank you for your consideration.

Sincerely,



James Evans, Chairman  
Southwest Florida Watershed Council

Cc: Sandy Bachelor  
Joe Collins  
Charles Dauray  
Shannon Estenoz  
Jerry Montgomery  
Kevin Powers  
Glenn Waldman  
Carol Ann Wehle  
Ken Ammon

*The mission of the Southwest Florida Watershed Council is to protect, conserve, manage and/or restore the land and water resources of the Caloosahatchee and Big Cypress Watersheds. Through increased awareness, participation and cooperation among all stakeholders in consensus building, planning and decision making, we are working to meet the economic, natural and cultural needs for this and succeeding generations.*