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Statement on Alternative Development for the Lake Okeechobee Watershed Project
to the
Working Group of the South Florida Ecosystem Restoration Task Force

April 20, 2006

Thank you for the opportunity to comment on the Alternative Formulation for the Lake Okeechobee Watershed (LOW) Project, an important component of the Comprehensive Everglades Restoration Plan (CERP). Audubon of Florida has consistently supported the CERP and has been actively engaged in the science and policy of Everglades restoration for more than a decade.

As we move CERP implementation forward, Audubon will continue to contribute its scientific and policy expertise to ensuring that each restoration component fulfills the Congressional directive to "restore, preserve, and protect the South Florida ecosystem while providing for other water-related needs of the region."[1] The restoration of the Everglades, Lake Okeechobee and the watershed will be successful if ecosystems and habitats are brought back to health, the spatial extent of wetlands are increased and abundant wildlife returned. To accomplish this, the most ecologically beneficial alternative must be chosen for implementation within each CERP component.

Audubon staff have closely followed and commented on the work of the Project Delivery Team (PDT) of the LOW Project over the past several years and would like to take this opportunity to offer specific comments on the project development process and the specific alternatives developed for the PIR.

Audubon urges the agencies responsible for implementation of CERP components to improve the transparency of the process. For several years the meetings of the PDTs were publicly noticed and their materials were quickly made available on evergladesplan.org. The switch to the Regional Project Delivery Team structure greatly reduced the ability of the public to follow the development of CERP projects, including the LOW project. The structure for public review of PDT progress is changing once again, and Audubon hopes the process will become more transparent and allow the public timely access to project materials.

Of the project alternatives identified for the LOW Project, Audubon understands that the preliminarily preferred alternative is number 6, which has a total static storage capacity equivalent to 8 inches of Lake Okeechobee water. Over the past two years, however, the net summer input into the Lake has been about 6 feet. It is clear that this alternative for the LOW Project will only begin to satisfy the great need for storage north of the lake, and that more storage is necessary. Additionally, because this alternative will capture only a fraction of inflows, the rest of the water will flow untreated into the Lake, significantly increasing phosphorus inflow and decreasing the ability to meet the phosphorus Total Maximum Daily Load (TMDL).

The identification and study of alternatives in the PIR includes consideration of the "cost effectiveness" of each. However, this analysis actually has focused on "cost efficiency" of the project

[1] WRDA 2000

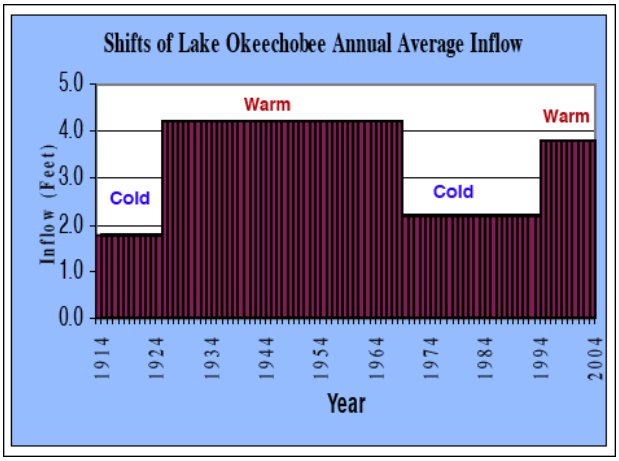
to determine the lowest cost per pound of phosphorus and acre-foot of water. While cost efficiency is important, effectiveness must be judged by whether the project will meet the goals established for CERP. While alternative 6 may be considered cost efficient, it will not be sufficient to prevent damaging high lake levels, harmful estuary releases, or to meet the lake's TMDL.

Audubon of Florida recognizes the challenges involved in restoring the Everglades, including Lake Okeechobee and its watershed. However, the benefits of restoration for the natural environment and the people of South Florida cannot be overstated. To help achieve a restored and sustainable South Florida, Audubon recommends that:

- Agencies outline a plan to identify and achieve the total water storage and treatment required for restoration, considering the Atlantic Multi-decadal Oscillation (AMO) cycle (see below), and identify how the LOW Project and other restoration projects fit into this larger equation;
- Increase storage upstream of the lake to dampen the impacts of high water and enable more water treatment;
- Increase water conveyance to the Everglades Agricultural Area (EAA);
- Increase water storage and treatment in the EAA to handle the increased conveyance.

The need to think bigger: a note on the Atlantic Multi-decadal Oscillation

Florida has experienced very wet years over the past two summers and it is increasingly clear that the weather pattern has changed from a dry to a wet cycle. Based on current understanding of the AMO, South Florida and can expect increased rainfall for another decade or two. This means that the average annual inflow of water roughly doubles, and with an average of four feet of net input, will regularly surpass the storage currently planned north of Lake Okeechobee. Please refer to the graph below, published by the South Florida Water Management District, which demonstrates this cyclical weather pattern and the likely increases in inflow during a warm cycle. Greater amounts of rain and flow will occur in the EAA as well, which will alter plans to send lake water south. CERP was based on the period from 1965-1995, almost perfectly overlaying the "cold," or drier cycle, and therefore underestimated the storage and treatment needs of this wetter cycle.



Source: South Florida Water Management District news release dated, (9-7-05)

Although the average inflows depicted in this figure do not show annual climate variability that has important implications, they are useful for seeing overall trends.