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November 29, 2004

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Juan H. Diaz-Carreras
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Reply To: West Palm Beach

Re: *Lake Worth Drainage District/Master Implementation Sequencing Plan*

Dear Mr. Redican and Mr. Diaz-Carreras:

The following comments are provided regarding the Master Implementation Sequencing Plan ("MISP") for the Comprehensive Everglades Restoration Plan ("CERP"). This plan includes the sequencing and scheduling for all projects of the Plan and must be completed by December 2004 as required by the Programmatic Regulations.

Several features of this version of the MISP appear to be different from previous versions. These include the concept of banding the projects into groups, the clear identification of the projects the South Florida Water Management District ("SFWMD") wishes to expedite and the identification of the pilot projects within their respective project bands. All of these changes make the document clearer and easier to identify where projects will fall in the CERP implementation process.

The Lake Worth Drainage District does have concerns with regard to the scheduling of projects that directly affect its interests such as the Lake Okeechobee ASR, and Palm Beach County Ag Reserve (and ASR Phase II).

Banding

The concept of banding the projects into groups related to their implementation dates appears to provide more organization to the MISP. However, the available documents on the MISP do not describe or discuss the rationale used to arrive at the projects assigned to the particular banding group in any level of detail. The only document that comes close to providing that

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rationale is the MISP Project Sequencing Descriptions, dated June 27, 2004 and this is not enough detail.

The Programmatic Regulations require that the MISP be developed based upon "the best scientific, technical, funding, contracting and other information available," but the public does not have any information regarding the trade-offs for project sequencing. Without this information, it is unclear what factors are considered in placing a particular project in which band.

Of note is that the specific completion dates for projects are only identified for Band 1. Bands 2 through 7 identify a five-year range in which the project is to be completed. This provides less certainty as to when the project will actually be completed. While it is difficult to determine when a project will be completed to the year, the uncertainty with providing a five-year range for completion undermines the confidence that stakeholders have that projects will be completed by any particular date.

Projects to be Expedited by the SFWMD

With the roll out of the State's Acceler8 program, many stakeholders have been concerned about the effect this program would have on the sequencing of other CERP projects. Without keeping a balanced mix of projects advancing forward, stakeholders may feel their interests are becoming secondary to the state's desire to expedite only a sub-set of CERP projects. The MISP addresses this issue by clearly marking which projects the State intends on accelerating. All of these projects are within Band 1 and were already slated for early completion; therefore, it would not appear that there has been any resource or funding trade-off to expedite these projects. The effects of the State's Acceler8 program on the rest of the CERP projects are unclear from merely reviewing the schedule itself.

Identification of Pilot Projects

In the previous versions of the MISP, the sequencing of the pilot projects was not as clearly identified as in this version because they were all grouped together towards the end of the schedule. In this version, the pilot projects have been integrated into the rest of the projects and have been identified within their respective band. This makes it much easier to understand the relationship between when a pilot project will be brought on line and when the larger project, which the pilot is testing, will be brought on line. The key to the success of many of the CERP projects is the information that is learned during the pilot project phase.

Specific Projects

It appears that several of the projects that have a direct impact on the interests of Lake Worth Drainage District have been moved up from the February 10, 2004 version of the MISP. These include:

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Hillsboro ASR Pilot Project	from 7/10/09 to 2006
Strazzulla Wetlands	from 1/21/09 to 2007
Winsberg Farm Wetlands Restoration	from 3/6/09 to 2008
Acme Basin B	from 11/20/08 to 2007
Site 1 Impoundment	from 4/25/11 to 2009

Other projects such as Lake Okeechobee ASR remain in later bands. These projects, in particular ASR pilot projects, should be implemented in an expedited manner to ensure that environmental and other water supply needs are met in parity with one another. For instance, while the Lake Okeechobee ASR Pilot project is scheduled for completion in 2008 and this is one year earlier than the February 10, 2004 version of the MISP, this is still seven years later than anticipated by the April 1999 Restudy. Further Lake Okeechobee ASR, Part 1 is slated for completion in 2015 to 2020, Band 3. It is critical to understand how Lake Okeechobee ASR will function in the overall CERP program and until the pilot projects and ASR projects are brought on line, the goal of switching from Lake Okeechobee as a water source remains uncertain.

Other Comments

Upon reviewing the Band 2 projects in the most recent version of the MISP, the ASR Regional Feasibility Study is not listed at all. This causes the Lake Worth Drainage District great concern because of the importance of determining the feasibility of this technology and, in particular, the recovery rates that can be relied upon for project planning purposes. This project must be listed in the MISP and expedited, if possible.

We appreciate the opportunity to comment on the November 5, 2004, version of the MISP, but the most recent versions of all supporting documentation that corresponds to the MISP must be supplied in one location so a complete picture of the schedule and rationale behind the decisions in developing the schedule can be understood clearly by all stakeholders. We look forward to reviewing that additional supporting documentation at your earliest convenience.

Sincerely,



Michelle Diffenderfer
Erin Deady

cc: William Winters, Manager – Lake Worth Drainage District
Patrick Martin, Director of Engineering – Lake Worth Drainage District
Danna Ackerman-White, Director of Community Affairs – Lake Worth Drainage District
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