SFWMD review and comments were limited to RMAs in which the District was listed as a "lead" or "other" agency, items pertaining to the District's jurisdiction, and providing information for consideration.

RMA #	Title	Comments
N-69	Support initiatives and provide financial incentives to restore and preserve wetlands north of Lake Okeechobee to stop discharges to coastal estuaries to protect estuaries and reefs.	The "Cost" section lists the SFWMD's DWM NE PES program as a potential funding source. Please note that this program is funded through the State Legislature and is not a funding mechanism.
N-78	Reduce ground water pollution from sources such as septic and storage tank infrastructure to watersheds associated with priority reef areas to improve water quality and reef health.	1) The "Background" section lists ASR as a potential groundwater pollution source. There is an unfortunate perception that ASR wells are used to permanently dispose of wastewater, as if they were deep injection wells. In fact, the water that is pumped into ASR wells is required to meet all federal primary drinking water standards (when pumped into a drinking-water designated aquifer). This requires extensive filtration and disinfection to meet those standards. Hence, the water that is stored within ASR wells is of drinkable quality, whereas the "ambient" water within the aquifer is brackish, and oftentimes not drinkable. In south Florida, most ASR wells are completed close to 1,000 feet underground, into aquifers that are overlain (confined) beneath many hundreds of feet of clay. At such depths, their impacts to near-shore reefs should be considered negligible. The concept of ASR includes recovery of the fresh water that is temporarily stored within the aquifer. The wells are operated in a "bi-directional" mode of operation. Therefore, they substantially remove the volume of water that is emplaced within the aquifer. The water recovered from ASR systems is typically used to provide ecological restoration or to meet water demands that would otherwise not be available during dry periods. For instance, during a drought, water recovered from ASR wells can be used to maintain local canal levels, to protect against saltwater intrusion. 2) The activities listed in this RMA (groundwater pollution and remediation, septic tanks, wastewater treatment systems) are outside the core mission of the SFWMD. Suggest removing the SFWMD as a lead agency and replacing with the Department of Health.
N-82	Support and promote existing and create innovative new initiatives that increase stormwater storage , and reduce stormwater runoff, enhance treatment, increase reuse, and reduce nutrients and other contaminants to the watershed, especially from surface water, to restore healthy estuaries.	This RMA is focused on local government efforts. Please add counties as a lead agency and move SFWMD from a "lead agency" to an "other agency".

S-25	Discourage public officials from granting or requesting extension to current ocean outfall legislation to ensure the timely closure (prior to 2025) of all treated wastewater outfall pipes and build/upgrade infrastructure for advanced water treatment and reuse to improve ocean water quality, reduce destructive algal blooms, and increase water reuse in the SEFCRI region.	Ocean outfalls are outside of the SFWMD's responsibility/authority. Please remove the SFWMD as a lead agency.
S-28	Support Everglades flow restoration to reduce land-based sources of pollution and improve water quality in estuaries and inlet contributing areas connected to the coral reef ecosystems of southeast Florida	1) The intended benefits and/or potential adverse effects section references estimated CERP Costs. Based on the 2015 CERP report to congress current CERP costs are estimated at $17,168 Million (see excerpt below). The report does not contain annual O&M numbers. 2) The Permitting/Enforcement Section states there are no permitting requirements with this recommendation. CERP projects require many regulatory authorizations including EFA permits, USACE permits, NEPA approvals, etc.

The cost estimate increase of $4 billion (***Table 7***) is due to price level (inflation) adjustment from October 2009 to October 2014, changes in project scope and schedule, and new project authorizations. Updated cost estimates are also available by project in ***Table 8***.

TABLE 7: COMPREHENSIVE EVERGLADES RESTORATION PLAN COST ESTIMATE UPDATE

Table 7: Comprehensive Everglades Restoration Plan Cost Estimate Update*		
	Summary (in millions)	
	Oct 10 Price Level	Oct 14 Price Level
Projects	$ 12,303	$ 16,274
AA&M	$ 579	$ 157
Program Coordination	$ 578	$ 737
TOTAL	$ 13,460	$ 17,168

*In current dollars.