



September 16, 2019

VIA EMAIL ONLY:

Major General Scott Spellmon Department of the Army
Headquarters, United States Army Corps of Engineers
441 G Street, NW
Washington, DC 203140-1000

Colonel Andrew Kelly
Department of the Army
Jacksonville District, United States Army Corps of Engineers
701 San Marco Boulevard
Jacksonville, Florida 32207-8175

Re: 2019 Planned Deviation to the Lake Okeechobee's Water Control Plan

Dear Major General Spellmon and Colonel Kelly:

The undersigned represent a large cross-section of south Florida's communities and businesses that rely on Lake Okeechobee. We have been engaged stakeholders in south Florida's water management issues for decades. We understand the United States Army Corps of Engineers (Corps) is seeking public comment on a planned deviation to the Lake's Water Control Plan. We appreciate the opportunity to provide our concerns regarding this deviation.

Under the current Lake Okeechobee schedule (LORS 2008), Lake levels have already been lowered to accommodate repairs to the Herbert Hoover Dike. In doing so, LORS 2008 diminished South Florida's water supply. Eleven years later, the Lake continues to be operated under the interim LORS 2008 schedule and we continue to experience diminished water supply for our communities and future growth. We are gravely concerned because the planned deviation proposes to lower Lake Okeechobee water levels beyond the levels in LORS 2008, discharging water to tide when LORS 2008 calls for conserving the water in the Lake. With the possibility that these extreme low Lake operations may be in effect until 2022, the Lake's multiple purposes, water supply, fish and wildlife, recreation, and navigation, will be compromised.

We support the Corps' desire to find solutions to our water quality challenges. Algae is a complex problem with multiple factors contributing to blooms in Florida and the U.S. But lowering the Lake in the dry season, as the deviation proposes, will not solve our algae problem, but can harm our communities from lack of water. South Florida has experienced the severe economic and environmental consequences that have resulted from past droughts caused when the Lake was dropped to low levels. We urge you to reconsider this deviation - the negative effects are many and the benefits are questionable.

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With the ongoing development of a new Lake schedule (LOSOM), Florida has a unique opportunity to build upon the rehabilitated Dike and equitably balance all of our water needs. We all want to restore our natural resources and work to solve these water quality challenges. Through the new Lake schedule, with input from *all* stakeholders, south Florida and the Corps can develop a holistic, balanced Lake schedule designed to serve the existing and future water needs of *all* south Florida. We appreciate the Corps' consideration of our comments and request that this letter be included in the planned deviation's administrative record.

Sincerely,



Michele Jacobs
President & CEO
Economic Council of Palm Beach County

cc: Ryan Fischer, Principal Deputy to Assistant Secretary of the Army, U.S. Army Corps of Engineers
Gib Owen, Assistant Deputy Water Resources Policy and Legislation, U.S. Army Corps of Engineers
Major General Diana Holland, Commander, South Atlantic Division, U.S. Army Corps of Engineers
Lieutenant Colonel Jennifer A. Reynolds, U.S. Army Corps of Engineers
Lieutenant Colonel Todd Polk, U.S. Army Corps of Engineers
Melissa Nasuti, U.S. Army Corps of Engineers
Drew Bartlett, Executive Director, South Florida Water Management District
Noah Valenstein, Secretary, Florida Department of Environmental Protection