



# SOUTH FLORIDA WATER MANAGEMENT DISTRICT

September 2, 2019

Mr. Chris Stahl  
Florida Department of Environmental Protection  
Florida State Clearinghouse  
2600 Blair Stone Road, MS 47  
Tallahassee, FL 32399-2400

**Subject:** Proposed Deviation to the Water Control Plan for the Lake Okeechobee and Everglades Agricultural Area (LORS 2008)

Dear Mr. Stahl:

In recent years, Harmful Algal Blooms (HABs) have significantly impacted the people, economy, and environment of Florida. The State of Florida and the South Florida Water Management District (District) are looking for all opportunities to limit HABs and their damaging effects. To prevent and study these HABs, the State has formed the Blue-Green Algae Task Force and Red Tide Task Force. In addition, the District has made operational changes to send more water south. The District is encouraged by the desire of the U.S. Army Corps of Engineers (USACE) to be forward thinking and offer up a possible solution to the challenges that have recently plagued Florida's northern estuaries.

The deviation suggested by the USACE would allow for greater flexibility in the system in order to address the discharge of HABs to our coastal communities. The District supports your request for the deviation but urges the USACE to be cautious when managing water within the Beneficial Use sub-band. Preemptive releases must be cognizant of dry season water needs to avoid exceedances of Minimum Flows and Levels and meet water supply responsibilities. In addition, the District is concerned that the yearly 'net zero balance' approach may not fully consider the seasonality of the system and could cause unintended environmental impacts. The District advises the USACE continue to consult the short- and long-term forecasts described in LORS2008 release guidance should the deviation be implemented.

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As the local sponsor for the Central and Southern Florida Project, the District is supportive of avoiding harmful discharges containing HABs to our estuaries. This year, we are positioned to achieve that goal. Additionally, the District will continue to engage with the USACE during LOSOM to further evaluate all aspects of Lake Okeechobee's multipurpose objectives. The District values our partnership with the USACE and looks forward to continuing our close coordination of operations for Lake Okeechobee. If you have any questions, please do not hesitate to contact me.

Sincerely,



Drew Bartlett  
Executive Director

DB/mj