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July 9, 2021

Via Email: LakeOComments@usace.army.mil

E. Timothy Gysan, PE, PMP
Senior Project Manager, Programs and Project Management Division
U.S. Army Corps of Engineers, Jacksonville District
701 San Marco Boulevard
Jacksonville, Florida 32207

Dear Mr. Gysan,

**Subject: Palm Beach County Comments on Iteration 2
Alternatives for the U.S. Army Corps of Engineers
Lake Okeechobee System Operating Manual**

At this time, Palm Beach County (County) is not able to recommend any of the Iteration 2 Lake Okeechobee System Operating Manual (LOSOM) alternatives that are currently under consideration by the U.S. Army Corps of Engineers (USACE).

As communicated to the Acting Assistant Secretary of the Army for Civil Works in June 2021 by County Mayor Kerner and others, including Reps. Frankel, Díaz-Balart, Steube, and Webster, additional time is needed to review, understand and evaluate the results of the complex regional modeling being performed as part of LOSOM. While some data and information was provided to the LOSOM Project Delivery Team (PDT) and stakeholders on June 9, 2021, data and information related to the batch model simulations performed during the development of Iteration 2 alternatives were only recently provided to the PDT on July 6, 2021.

Based on the County's preliminary review, the Iteration 2 alternatives do not appear to be well-balanced, perhaps due to weaknesses in the approach used by the USACE to conceptualize the alternatives or flaws in the multi-objective scoring methodology created by the USACE. For example, the performance of Lake Okeechobee ecology key metrics declines for *all* Iteration 2 alternatives as compared to the Future Without Project Condition (aka NA25). Except for Alternative BB, the performance of water supply, navigation and Lake Okeechobee minimum flow and level (MFL) performance key metrics are worse or only slightly improved as compared to NA25 and therefore may not comply with existing state law or the Congressionally-authorized purposes of Lake Okeechobee.



Mr. Tim Gysan
July 9, 2021
Page 2 of 2

More specifically, based on a preliminary review conducted by the County to date, there appear to be deficiencies in each of the Iteration 2 alternatives, which are summarized below:

- Alternative AA: Lake Okeechobee Service Area (LOSA) water supply demands that are not met increase as compared to the Future Without Project Condition (NA25); the number of months with significant LOSA cutbacks also increase as compared to NA25; both are undesirable.
- Alternative BB: results in the second highest average annual flow volumes from Lake Okeechobee to the Lake Worth Lagoon compared to all Iteration 2 alternatives; this is undesirable.
- Alternative CC: results in the highest total volume of flood control releases from Lake Okeechobee (and therefore the highest nutrient loads) to the Caloosahatchee Estuary of any Iteration 2 alternative; results in a 40 percent increase in flows between 2,600 and 4,500 cubic feet per second to the Caloosahatchee Estuary, which can have significant negative impacts to the ecosystem; both are undesirable.
- Alternative DD: the Northern Estuaries Algal Bloom Risk Metric scores worse than NA25.
- Alternative EE1: the number of Lake Okeechobee MFL exceedances (11) and Caloosahatchee MFL exceedances (12) are higher than NA25 (9 and 10, respectively).
- Alternative EE2: LOSA water supply metrics score worse than NA25; the number of Lake Okeechobee MFL exceedances (11) and Caloosahatchee Estuary MFL exceedances (12) are higher than NA25 (9 and 10, respectively).

Palm Beach County urges the USACE to take additional time to develop better balanced alternatives, perhaps utilizing the available results from the hundreds of thousands of model simulations already completed, instead of trying to optimize the sub-optimal Iteration 2 alternatives.

Sincerely,

Jeremy McBryan, PE, CFM
County Water Resources Manager

cc: Lisa Aley, U.S. Army Corps of Engineers
Eva Velez, U.S. Army Corps of Engineers
Col. Andrew D. Kelly, U.S. Army Corps of Engineers
Lt. Col. Todd Polk, U.S. Army Corps of Engineers
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