

FLORIDA INLAND NAVIGATION DISTRICT



September 17, 2019

Ms. Melissa Nasuti
Jacksonville District Corps of Engineers,
701 San Marco Boulevard,
Jacksonville, FL 32207-8175

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RE: Comment on proposed LORS deviation of Lake Okeechobee

Dear Ms. Nasuti:

The Florida Inland Navigation District (FIND) is the state sponsor of the Intracoastal Waterway in Florida and the local navigation sponsor of the Okeechobee Waterway (OWW) in Palm Beach and Martin Counties. In this capacity, the District provides the lands required for the management of dredge material from the maintenance of the federal channels.

While understanding the need of the U. S. Army Corps of Engineers (USACE) to re-examine the opportunities to balance LORS/LOSOM purposes, FIND requests the USACE continue to recognize that any plans for improving the management of Lake Okeechobee must address continued safe navigation of the OWW. The OWW is an important marine highway which provides the only cross-Florida access for both commercial and recreational vessels.

The lake level has a significant impact upon commercial and recreational navigation and the marine industry of Florida. A minimum Lake level of 12 feet provides a maximum recommended draft of 6 feet along Route 1 and 4 feet along Route 2 (based on a 2007 channel condition survey), provided the OWW channel is properly maintained. When lake levels are allowed to drop below 12 feet, navigation on the federal waterway becomes dramatically constricted, commercial and recreational vessel traffic is significantly reduced, and the use of the OWW as a hurricane evacuation route is severely compromised.

Lake levels are often lowered to provide for the water capacity needed during an active hurricane season. However, lake levels below 12 feet are of grave concern to navigation, preventing vessels from safely evacuating out of harm's way through the OWW. It should be noted that had the lake level been below 12 ft NGVD the last week of August, many of the vessels that traveled west through the locks would not have been able to safely navigate the OWW to evacuate from the threat of Hurricane Dorian.

If lower lake levels are unavoidable, possible solutions would need to include both Federal funding and USACE action to update surveys of the OWW channels and provide additional dredging of Route 1 and Route 2 to adequate depths for safe navigation and the emergency evacuation of vessels in case of storm events. The

dredged material could be used to provide the creation of habitat islands in the southern and eastern portion of the lake.

In addition to navigation, recreation is also a congressionally authorized purpose of the OWW. Lake levels lower than 12 feet have a large negative economic impact on the marinas and fishing businesses located around the lake, with many marinas, boat ramps and landings becoming inaccessible.

As the USACE reviews LORS deviations, we request that you give strong consideration to maintaining lake levels at or above 12 feet which maintains safe navigation across and around Lake Okeechobee. Thank you for your time and your careful consideration of this request. Should you have any questions concerning this matter, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark Crosley", written over a horizontal line.

Mark Crosley, Executive Director
Florida Inland Navigation District