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April 30, 2021

**Via Email: [LakeOComments@usace.army.mil](mailto: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 Balanced Plans for  
the U.S. Army Corps of Engineers Lake Okeechobee  
System Operating Manual**

As a part of its Lake Okeechobee System Operating Manual (LOSOM) Project Delivery Team (PDT) process, the U.S. Army Corps of Engineers (USACE) has requested input on the desired characteristics of a balanced plan and the performance to be carried forward as part of a balanced concept. The below comments are being provided on behalf of Palm Beach County (County). Please carefully consider the comments below and include this comment letter in the LOSOM administrative record. Much of the input below was previously provided to the USACE in April 2019 during the LOSOM public scoping period and during the April 12, 2021 PDT Workshop.

**Desired Characteristics of a Balanced Plan**

- A balanced plan must be consistent with federal and state law.
- A balanced plan must recognize all of Lake Okeechobee's Congressionally authorized purposes including flood control, water supply, recreation, navigation, and preservation of fish and wildlife.
- A balanced plan should not create unrealistic expectation, e.g. it should be recognized that Lake Okeechobee operations alone cannot resolve the region's water quality problems.
- A balanced plan must be predictable; any operational flexibility included must not override the operational plan. If it does, it will invalidate LOSOM's National Environmental Policy Act process.
- A balanced plan should not exacerbate the impacts that result from the perturbations expected to occur as a result of natural and climatic processes.



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- A balanced plan must avoid widespread damage to the County's economy and ecosystems such as Lake Okeechobee, the Lake Worth Lagoon Estuary, and the Loxahatchee River.
- A balanced plan should minimize Lake Okeechobee releases to the Lake Worth Lagoon Estuary – as the impacts of nutrients and suspended solids delivered to the Estuary are wreaking havoc on the \$110 million of investments by the County and state and local partners to cap problematic muck sediments and restore habitats in the Estuary.
- A balanced plan must accurately communicate the environmental effects to all ecosystems, e.g. modeling results should clearly state “Lake Okeechobee releases to Lake Worth Lagoon Estuary”, not veil the facts by labeling these releases “L-8 to Tide.” The Lake Worth Lagoon Estuary is not “tide”; connections to the Atlantic Ocean are 8-9 miles away from where the C-51 Canal discharges Lake Okeechobee releases and stormwater runoff into the Lake Worth Lagoon Estuary.
- A balanced plan must not result in the redirection of flows to the Lake Worth Lagoon Estuary that should be treated by the Stormwater Treatment Areas and conveyed south to the Everglades.
- A balanced plan must not deviate from the U.S. Environmental Protection Agency-approved and Florida Department of Environmental Protection-approved Restoration Strategies Plan, and related consent orders and permits.
- A balanced plan should do more than improve water supply performance as compared to the 2008 Lake Okeechobee Regulation Schedule (LORS2008).
- A balanced plan should return water supply conditions to pre-LORS2008 performance by maximizing the protection of water supplies to ensure permitted water allocations are available, and minimizing the potential for water use restrictions.
- A balanced plan should comply with the environmental justice (and all other relevant) components of President Biden's Executive Order 14008, signed January 27, 2021.

**Performance to be Carried Forward as Part of a Balanced Concept**

- Only alternatives that result in less Lake Okeechobee flows to the Lake Worth Lagoon Estuary should be carried forward.
- Only alternatives that achieve pre-LORS2008 water supply performance should be carried forward.

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