

August 10, 2021

Colonel Andrew Kelly
Jacksonville District Commander
U.S. Army Corps of Engineers
701 San Marco Boulevard
Jacksonville, FL 32201

Dear Colonel Kelly,

Thank you for your selection of Balanced Alternative CC as the preferred alternative for the Lake Okeechobee System Operating Manual. As you know, Balanced Alternative CC was a major compromise for stakeholders on Florida's east coast, as Balanced Alternative AA performed far and away the best for the St. Lucie; however, recognizing that Balanced Alternative CC performs significantly better for the Caloosahatchee and water supply, east coast stakeholders support the plan contingent upon performance for the St. Lucie not getting any worse than currently modeled.

To that end, I want to express my support for several of the Iteration 3 goals outlined during the Project Delivery Team meeting on August 9, 2021. These goals include sending more water south, adding flexibility in the lower portions of the schedule, reducing stress to the Caloosahatchee, recognizing the Seminole Tribe as a separate water supply user, and addressing the impacts of toxic algae.

I am deeply concerned, however, that under these goals the sugar farms in the Everglades Agricultural Area (EAA) are being provided with a guaranteed level of performance while the St. Lucie remains at severe risk of receiving more toxic discharges. In the weeks since the preliminary announcement of Alternative CC as the preferred plan, east coast stakeholders requested and were denied an iteration 3 goal to maintain performance for the St. Lucie during optimization. Instead, this guarantee was provided to the sugar farms in the EAA who already receive near perfect performance under the Lake Okeechobee Regulation Schedule.

In fact, a 2019 University of Florida Water Institute Report noted that the U.S. Department of Agriculture Natural Resources Conservation Service had failed to find any evidence of water shortages lowering crop yields in South Florida since the 1980s. At the same time, Florida's east and west coasts have been inundated with toxic discharges from Lake Okeechobee nearly every year.

By providing guaranteed performance for EAA water supply, but not for the St. Lucie, I am concerned that the Army Corps is putting their thumb on the scale in a way that will cause severe

harm to the St. Lucie to provide even greater benefit to the sugar farms in the EAA. Moreover, this goal unnecessarily restricts the flexibility needed to reduce stressful and damaging flows to the Caloosahatchee.

This prioritization appears to enable a “bait and switch” that would see Balanced Alternative CC not just optimized but radically altered to undermine the performance of the current plan. Some are even now advocating for a new model—SR3.5—that would double the volume of discharges to the St. Lucie, again relying on our community to shoulder the burden of harm despite receiving no benefits from the system.

To be clear, east coast stakeholders cannot support Balanced Alternative CC if it is re-written to exceed the Iteration 2 modeled performance of 72,000 acre-feet per year, which was already a substantial concession on our part. This would be an unacceptable betrayal of Florida’s east coast after we compromised early in the process to help our fellow Floridians.

In conclusion, now is not the time to back away from the opportunity to rebalance the scales toward more just management of Florida’s waterways by making a once-in-a-decade improvement to the harmful status quo. I look forward to continuing to work with you to accomplish this goal, and I thank you again for the hard work of all those involved in this undertaking.

Sincerely,

Brian Mast
Member of Congress

CC:

Timothy Gysan
Senior Project Manager
U.S. Army Corps of Engineers