



Everglades Coalition

1000 Friends of Florida
Arthur R. Marshall Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon of the Western Everglades
Audubon Society of the Everglades
Backcountry Fly Fishers of Naples
Bullsugar Alliance
Calusa Waterkeeper
Cape Coral Friends of Wildlife
Center for Biological Diversity
Conservancy of Southwest Florida
Defenders of Wildlife
“Ding” Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
Florida Bay Forever
Florida Conservation Voters Education Fund
Florida Defenders of the Environment
Florida Keys Environmental Fund
Florida Native Plant Society
Florida Oceanographic Society
Friends of the Arthur R. Marshall
Loxahatchee National Wildlife Refuge
Friends of the Everglades
Hendry-Glades Audubon Society
International Dark-Sky Association,
FL Chapter
Izaak Walton League of America
Izaak Walton League Florida Division
Izaak Walton League Florida Keys Chapter
Izaak Walton League Mangrove Chapter
Lake Worth Waterkeeper
Last Stand
League of Women Voters of Florida
Martin County Conservation Alliance
Miami Pine Rocklands Coalition
Miami Waterkeeper
National Audubon Society
National Parks Conservation Association
National Wildlife Refuge Association
Natural Resources Defense Council
North Carolina Outward Bound School
Ocean Research & Conservation Association
Reef Relief
Sanibel-Captiva Conservation Foundation
Save It Now, Glades!
Sierra Club
Sierra Club Florida Chapter
Sierra Club Broward Group
Sierra Club Calusa Group
Sierra Club Central Florida Group
Sierra Club Loxahatchee Group
Sierra Club Miami Group
Snook and Gamefish Foundation
South Florida Audubon Society
Southern Alliance for Clean Energy
The Florida Wildlife Federation
The Institute for Regional Conservation
The National Wildlife Federation
The Urban Environment League of
Greater Miami
Theodore Roosevelt Conservation
Partnership
Tropical Audubon Society

April 22, 2019

Dr. Ann Hodgson
U.S. Army Corps of Engineers Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019

RE: Everglades Coalition Public Scoping Comments on new Lake Okeechobee System Operating Manual

Dear Dr. Hodgson:

The 64 member organizations of the Everglades Coalition, representing local, state, and national conservation and environmental organizations dedicated to restoring America’s Everglades, submit the following comments on scoping for the development of a new Lake Okeechobee System Operating Manual. The Everglades Coalition recommends that the Army Corps consider a broad scope of alternatives that address the following components:

- Lake Okeechobee should be managed as a natural ecosystem to optimize lake health and support robust lake vegetation regrowth, which will help improve water quality, and benefit wildlife and recreational opportunities.
- During dry periods the water needs of environmental systems should be prioritized. Environmental systems should not be rationed before permitted users. All water users should be rationed equitably; one water user, including any natural system, should not be unilaterally cut off before others.
- Lake levels and water discharge impacts on water quality in both the lake and downstream estuaries should be modeled and considered in the range of alternatives.
- A full range of alternatives should be modeled, including levels within the Beneficial Use and Water Shortage Management Bands to fully understand the impacts and tradeoffs of various lake operations.
- The Corps should ensure that environmental performance measures accurately reflect environmental conditions. For example, performance measures and downstream flow targets should take into consideration the actual volume of water needed to meet the salinity target in the Caloosahatchee of 10 psu at the Fort Myers monitoring station. Dry season salinity data indicate flows in the range of approximately 800-1000 cfs are needed.

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- Under the current Lake Okeechobee Regulation Schedule, flows to the Caloosahatchee are measured at different water control structures depending on meteorological conditions and Lake Okeechobee levels. Flows to the Caloosahatchee should always be measured at the Franklin Lock (S-79) structure located at the beginning of the estuary.
- The Corps must incorporate a robust evaluation of the impacts of sea level rise on LOSOM. It should include an evaluation of the current and future tidal prism in the estuaries and how it will be affected by incrementally rising seas. One example: it must be determined whether more water will be needed in the future to meet natural system Minimum Flows and Levels and salinity targets that have been established.

Finally, we urge the Corps to maintain an inclusive planning process that allows stakeholders from across the state to participate, ask questions, and provide feedback as the project progresses. That process should also consider opportunities for accessible in-person access to post-scoping planning meetings across the LOSOM project area.

Sincerely,



Mark Perry
Co-Chair



Marisa Carrozzo
Co-Chair

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