Watershed Council
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Planning Division, Environmental Branch, Special Projects Section
Jacksonville District Corps of Engineers, Department of the Army
P.O. Box 4970
Jacksonville, FL 32232-0019

Ladies and Gentlemen,

Thank you for the opportunity to learn about and provide comments on the measures being considered as changes to the Lake Okeechobee Regulation Schedule (WSE). Your letter of July 21st and the presentation made by your representative at the August 31st meeting of the South Florida Water Management District's Lake Okeechobee Committee have led to a number of discussions amongst Southwest Floridians who want to be involved as the process to change the regulation schedule proceeds.

The Southwest Florida Watershed Council is a grass-roots, multi-county coalition of individuals, organizations, agencies and businesses that have come together during the last two years to address issues affecting the Caloosahatchee and Big Cypress watersheds. The purpose of the Council is to ensure that the interests and concerns of all stakeholders are addressed, and that long term management strategies balance the needs of this region's growth and the natural systems upon which our economy and quality of life depend. We submit the following comments on the opportunities to improve the Regulation Schedule for your consideration.

- Despite many attempts to acquire information in recent years, we do not yet have data that allows us to understand the water budget of Lake Okeechobee, and this leads us to believe that it is managed to provide a two year supply for agricultural and utility water users, rather than the one in ten year drought event that we believe is provided for by law.

- Since the current schedule is based on 31 and 36 years of historic rainfall and associated tributary inflows into Lake Okeechobee, most of the historic data used to model Lake Okeechobee behavior is from what climatologists consider a "dry cycle." Climatologists now believe we are approximately 10 years into a 30 year "wet cycle" of the Atlantic Multi-decadal Oscillation. Given this fact, we believe that climatic cycles need to be addressed when the regulation schedule is modified.

- Historic tributary contributions to Lake Okeechobee have certainly changed over time due to land use changes in the basin. We believe that modeling efforts must reflect current and future land uses, rather than past land uses.

- In a similar vein, we believe that agricultural water use requirements should be projected by incorporating figures of actual water used during draught periods, rather than solely through the use of crop production models that do not reflect current and expected irrigation uses.

- We are very interested in learning how the proposed forward pumps will be factored into the regulation schedule.

- While some of the possible changes to the regulation schedule (such as 'rate of lake level rise' triggers and using smaller time periods than the currently used 30 day rainfall calculation) have potential for improving the health of the Lake without compromising flood control or the health of the estuaries, others don't appear to have merit. The idea of changing the schedule lines by decreasing all zones by one foot will not provide additional storage for storm flows – something that is desperately needed to avoid damaging releases to the estuaries. We believe that expanding Zone D by one foot (as has been discussed at public meetings as a measure to complement the forward pumping concept) would offer the needed flexibility for storage while reducing the potential for damaging releases to the estuaries. Having an additional foot of storage available, if necessary, would make the goal of a 12 foot Lake level at the end of each dry season feasible while keeping the 15.5 foot storage target at the end of each wet season.

- We'd like to know what provisions can be made to allow for Lake water to be discharged into the Everglades Agricultural Area to prevent the Lake from approaching or exceeding the level that causes water managers to become concerned about public safety. It is our understanding that it is the discharge of excess water in this 700,000 acre area that causes the unbalance in the overall storage equation for the Everglades system. If property owners were required to meet the same one inch rainfall storm event retention test that is required of current development, and storage of excess water occurred within the basin in which it originated, there would be more storage options for Lake water.

We look forward to participating in the process to improve the regulation schedule for Lake Okeechobee during the coming year.

Sincerely,

Susan E. Brookman