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April 5, 2021

Via Email: 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 U.S. Army Corps of Engineers Lake Okeechobee System Operating Manual Lake Okeechobee Algal Bloom Risk Assessment Metric

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 comments on the draft Algal Bloom Risk Assessment Metric. 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.

The following are concerns with the USACE's approach to water quality under LOSOM:

- Projects to address water quality are needed in Lake Okeechobee tributary basins north of the Lake and within the Lake itself.
- A continued focus on developing Lake operational and water quantity strategies in an effort to address regional water quality problems, which are clearly the responsibility of the state of Florida through the Total Maximum Daily Load and Basin Management Action Plan efforts, creates unrealistic expectations.
- While the USACE can consider water quality, it cannot be to the detriment of an authorized project purpose. As such, an operational schedule for a USACE civil works project cannot be developed based on an unauthorized project purpose, such as the potential for algal blooms.

In addition to the above issues that have been previously raised, the State of Florida's Blue Green Algae (BGA) Task Force as well as LOSOM Water Quality Sub-team members provided feedback to the USACE indicating that development and application of the Algal Bloom Risk Assessment Metric lacks a sound, scientific foundation.



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However, despite issues raised by experts and stakeholders, it has become clear through verbal statements made and actions taken by USACE staff that the USACE is utilizing the Algal Bloom Risk Assessment Metric during LOSOM to develop and evaluate alternative Lake Okeechobee operations. As such, the County offers the following comments:

- Why is there no consideration of algal bloom risk associated with Lake Okeechobee releases to canals within Palm Beach County?
- Why is there no consideration of algal bloom risk associated with Lake Okeechobee releases to the Everglades Stormwater Treatment Areas and the Flow Equalization Basins?
- Why is there no consideration of algal bloom risk associated with Lake Okeechobee releases to the Lake Worth Lagoon?
- Why is there no consideration of algal bloom risk associated with Lake Okeechobee releases to the City of West Palm Beach's M-Canal and Grassy Waters Preserve?
- Why is there no consideration of algal bloom risk associated with the local drainage basins east and west of Lake Okeechobee?
- Will other water quality metrics be developed to assist in guiding USACE Lake Okeechobee operations?

Due to the unpredictability of algal bloom events, the USACE should carefully consider comments provided and concerns raised by the BGA Task Force including their suggestion that the scientific basis for the metric needs further development and other environmental factors, such as temperature, sunlight, wind speed, wind direction, etc., should be considered.

In addition, the USACE should consider alternatives that retain water in Lake Okeechobee when an HAB is a potential concern, rather than encouraging preemptive releases to achieve a low Lake water levels that may not effectively manage HAB risk, especially considering the large taxpayer investment to repair the Herbert Hoover Dike.

In conclusion, given this is the first time the USACE has tried to evaluate these issues in the context of the regional water management system, more care needs to be taken in the analysis. This is a multi-faceted problem and cannot be rushed given the significant consequences of its effects. Lake Okeechobee operations must be based on known science to ensure Congressionally-authorized project purposes are met.

Sincerely,

Jeremy McBryan, PE, CFM
County Water Resources Manager

cc: Lisa Aley, U.S. Army Corps of Engineers
James Riley, U.S. Army Corps of Engineers
Eva Velez, U.S. Army Corps of Engineers