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Submitted by email

February 23, 2016

Dear Ms. Auvenshine:

This letter constitutes Audubon Florida's comments on the December 2015 DRAFT Environmental Impact Statement for the Herbert Hoover Dike Dam Safety Modification Study (DSMS). Audubon has had full time staff working on Lake Okeechobee since 1936 and have been stewards of 28,250 acres of Wildlife Sanctuaries inside the Herbert Hoover Dike (HHD); designated by the Governor and Cabinet in 1938. We support the Corps' selected alternative for remediating the HHD.

Due to its size and location, Lake Okeechobee is probably the single most important water feature in south Florida. All flow from the 2.6 million acre Northern Everglades watershed passes through the Lake on its way south. The Lake furnishes flood protection and water supply for humans and downstream ecosystems. It supports fisheries and wildlife habitat, navigation across the state and a tourism-based economy. The Lake also strongly influences rain and temperature patterns in central Florida. Recent concerns about the safety of the HHD however, have resulted in water management decisions being made primarily for precautionary reasons, which have interfered with many of these functions. With the repair of the HHD, more options will be available and many of Lake Okeechobee's values can be restored and maximized.

Once remediation is complete, occasional higher water levels may be permissible in the Lake. We support the Corps' intention not to modify the LORS schedule until the entire remediation effort is finished because allowing higher levels before the HHD were safe would be imprudent. However, once a new operating schedule is feasible, we caution that higher water levels create new issues.

The "Stage envelope" performance measure for the Lake quantifies how often water levels are in an ideal range, which is considered within 6 inches of a dry season low of 12.5 feet and a wet season high of 15.5 feet. From 1978 until the early 2000s, water levels were maintained higher than the stage envelope most of the time and proved disastrous to the Lake's biota, and to estuaries who suffered massive releases from an often too-deep lake. The chronically deep levels also hastened the erosion of the HHD and any future schedule will have to weigh impacts of deep levels on the Lake, Estuaries, and the HHD itself.

Although chronically deep levels are a concern, occasional deep water during wet period emergencies, could be a future part of management. To a point, the lake marshes and biota can withstand temporary

deep water events with manageable harm. Were the HHD safer today, the Corps could contemplate reducing or halting the current disastrous releases to the estuaries for a period of time to benefit them, and resume releases later. With the HHD in its present condition, such an option is not feasible and is an example of how a safer Dike can allow improved management.

Acute high water events bring up the most important point about post-remediation HHD safety. Lake Okeechobee does not have nearly enough outlet capacity to keep up with inflows, meaning Lake levels can rise almost uncontrollably. The DSMS noted that LORS would allow a lake stage of 22.8 ft (NGVD29) in a peak SPF, which could be a threat even to a remediated Dike. In short, even when HHD repairs are complete, large inflow events will remain a concern for HHD safety.

In the long term, the best way to reduce the threat of storms overwhelming the remediated HHD is to build large amounts of storage capacity outside of Lake Okeechobee, and the conveyance capacity needed to utilize it quickly. Building such infrastructure is what the Comprehensive Everglades Restoration Plan was designed to do. CERP itself is beyond the scope of the DSMS, but will be an indispensable component to the future safety of the HHD. Audubon pledges to support efforts at the national and state levels to help the Corps and its partners make south Florida as safe and functional as possible.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Paul N. Gray".

Science Coordinator
Everglades Restoration Program