



FLORIDA FARM BUREAU FEDERATION

THE VOICE OF AGRICULTURE

June 24, 2024

Colonel James L. Booth
Commander and District Engineer
U.S. Army Corps of Engineers, Jacksonville District
701 San Marco Blvd
Jacksonville, FL 32207

Delivered via email to LakeOComments@usace.army.mil

Re: Lake Okeechobee System Operating Manual Final Environmental Impact Statement

Dear Colonel Booth:

Florida Farm Bureau Federation appreciates the opportunity to provide comments on the Final Environmental Impact Statement (EIS) Lake Okeechobee System Operating Manual (LOSOM) dated May 2024. Florida Farm Bureau is the state's largest general agriculture organization with over 132,000 member families. We are a grass roots, non-profit who represents and speaks on behalf of all agriculture, large and small, throughout Florida.

Florida's economy depends on viable, productive agriculture, and honest, hardworking farmers.

The Lake Okeechobee Service Area (LOSA) specifically, is a unique place where a multitude of agriculture takes place such as cattle, and crops including sugarcane, vegetables, fruit, sod, and rice. South Florida crop production feeds much of the eastern United States (up to 180 million Americans) during the winter months, bringing huge economic impacts and tens of thousands of jobs to South Florida. This is possible due to the practices and infrastructure implemented by farmers, the area's long growing season, mild winters, and availability of water.

Farm Bureau supports Lake Okeechobee Regulation Schedule management and alternatives that maximize protection of the water use community's existing permitted water allocations, minimize the potential for short-term water supply shortages, and assures the predictability of a continued and reliable water supply, while balancing the authorized purposes of the Central and South Florida Project (C&SF Project). Additionally, we strive for a balanced Lake Okeechobee regulation schedule that provides adequate flood protection, complies with

adopted minimum flows and levels and permitted water supply needs while adhering to the Florida Water Resources Act and the provisions thereunder.

We remain concerned about the state's ability to meet water supply needs under LOSOM. LOSOM details some inconsistencies regarding agricultural irrigation demand. We feel that there is an underestimation of agricultural water demand, and an insensitivity to changes in future demand which can be caused by a multitude of factors, including changes in crop type, weather, and market value. The water supply performance evaluation concluded that LOSOM is a moderate improvement, however PA25 showed minimal to minor simulated improvements before the LOSA demand modeling uncertainty was discovered. Additional examination is needed to understand and correct the unresolved water demand impact and to bridge the gap between real world data and modeling assumptions.

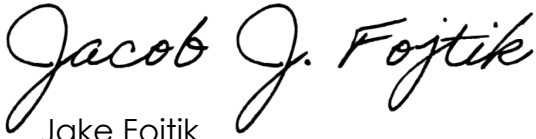
We are in favor of the use of flexibility within a Lake Okeechobee regulation schedule to allow the lake elevation to rise towards the end of the summer rainy season, to provide sufficient water for existing permitted users during the dry season in accordance with the adopted level of service for water supply. However, the unprecedented operational flexibility in the LOSOM schedule is concerning for many reasons. The amount of flexibility and seemingly week-to-week decision making lacks consistency and dependability that is needed and should be afforded to all existing legal users consistent with State law. We must restore existing legal water user's rights to their permitted levels and implement a Water Control Plan that reflects and adheres to the schedule described in the Environmental Impact Statement.

Both the United States Army Corps of Engineers (USACE) and the South Florida Water Management District (SFWMD) share responsibility for Lake Okeechobee operations consistent with Federal and State law. However, the SFWMD has the authority under Chapter 373, F.S. to establish, maintain, and regulate water levels in water bodies owned, maintained, or controlled by the SFWMD; and to regulate discharges into, or withdraws from, water bodies. This authority is implemented to fulfill the purposes of Chapter 373, F.S. which include flood control, water supply, tribal water rights, water quality protection, and environmental protection. In all past Lake Okeechobee regulation schedules, the Water Control Plan (WCP) included a defined zone above the Water Shortage Management Zone (WSM) for water supply and beneficial releases with deference to the SFWMD. Without explicit deference and a defined WCP, LOSOM greatly increases the SFWMD's vulnerability to meet its water supply responsibilities. Previous approaches to this Federal and State partnership have minimized the risk of water shortage while providing greater protection for ecosystems. Deference to the SFWMD for water supply recommendations during lower lake stage conditions is of utmost importance and would assist with addressing water supply uncertainties.

Farming takes time and an immense amount of planning around a multitude of factors; adequate, legal water supply should not be one of them. Farmers, as all other water users across south Florida, need certainty that they will have access to sufficient water supply in order to survive and continue to provide food security and a safe, abundant, and affordable food supply for the citizens of Florida, and for the United States.

Thank you for the opportunity to provide comments on the LOSOM Final EIS and Water Control Plan. We look forward to continued progress and collaboration on Lake Okeechobee operations. If you have any questions regarding the comments provided, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Jacob J. Fojtik". The signature is written in a cursive, flowing style.

Jake Fojtik
Assistant Director of Government & Community Affairs
Florida Farm Bureau Federation