Rivers Coalition
Save Our River! Stop the Discharges!
P.O. Box 2627, Stuart, FL 34995 772-225-6849

May 20th, 2014

Jacksonville District Engineer
P.O. Box 4970
Jacksonville, FL 32232
Re: Federal Dam safety standards and Herbert Hoover Dike

Dear Colonel Dodd:

On behalf of the Rivers Coalition, representing over 70 member organizations and more than 300,000 Floridians, our engineers have analyzed and we are aware that the Corps is preparing a Dam safety report for HHD around Lake Okeechobee. We would appreciate clarification on a couple of issues so we understand them fully.

We believe HHD is classified as a Dam according to the US Department of Homeland Security and FEMA (1979, reprinted 2004) Federal Dam Safety Standards. If this is incorrect, or you are using a different document(s) for HHD evaluation, please advise.

We further believe HHD is classified an "embankment dam". If this is incorrect please advise.

We believe the language in page 28 of the referenced document "Design Flood Releases" is directly applicable to HHD.

a. Design Flood Releases

(1) Spillway and Outlets. Gated spillways are the usual hydraulic appurtenances for control of all or the major portion of the design flood and major emergency releases. Outlets (sluiceways, conduits and tunnels) may be used alone or in conjunction with spillways to control flood discharges.

(a) Selection of type. Spillways and outlets should be selected to meet the site specific purposes of the project. For a drainage area with short concentration time combined with reservoir storage capacity that is small relative to the flood volume, especially for embankment dams, (1) the spillway should usually be uncontrolled, and (2) outlets should not normally be used for sole or part control of the design flood except in special cases where the outlets can be uncontrolled.

(b) Capacity. Spillway and outlet capacity should be sufficient to satisfy the discharge requirements of the reservoir regulation plan and other design considerations.

In particular, we interpret this section to be applicable to HHD in that Lake O combines a large drainage area and short concentration time with reservoir capacity that is small relative to flood volume.

Please advise if we are incorrect in this interpretation.

We have observed that during wet periods Lake O can rise much faster than all existing outlets can lower it. However, we do not understand how LORS 2008 can be interpreted as a reservoir regulation plan, if there is no design flood emergency release mechanism. Perhaps clarification of the design flood event and assumptions regarding Lake O state at the time of the design flood could address this issue?

While we realize Lake O fluctuates in storage capacity with time, our recent history of rapidly rising stages with inadequate outflows for Lake O management suggest we have been inordinately lucky HHD did not fail during the past decade. The Bromwell Report suggests we should have spent our time in Las Vegas, keeping those of us who live in the Lake's shadow safe, and translating our luck into money.

Humor aside, we absolutely fail to understand how HHD can be operated per the status quo, with the public spending hundreds of millions of dollars treating piping and seepage symptoms, without addressing the necessity for a spillway outlet for emergency flood releases. The EAA is not going to stop subsiding anytime soon, and the public is not going to stop subsidizing their drainage anytime soon.

It is quite possible the cost for a spillway and flow-way south would be less expensive than just continuing to plug holes in the HHD. We would appreciate an examination of these issues in your upcoming Safety Analysis.

Sincerely,

Leon Abood, Chairman
Rivers Coalition

CC:
Lt. Col. Thomas Greco, USACE
Congressman Patrick Murphy
Senator Bill Nelson
Senator Marco Rubio