

September 18, 2017

Mr. Douglas W. Lamont
Acting Assistant Secretary of the Army (Civil Works)
U.S. Army Corps of Engineers
108 Army Pentagon
Washington, DC 20310

Dear Acting Assistant Secretary Lamont:

I write to express concern with the Shoreline Management Plan (SMP) proposed by the U.S. Army Corps of Engineers (the Corps) for Table Rock Lake. The SMP proposal in its current form would place additional burdensome regulations on lake users and property owners with little justification or rationale. The Code of Federal Regulations requires that shoreline management plans promote the safe and healthful use of a lake while balancing public and private uses, including environmental safeguards. This SMP misses the mark. The proposal goes too far by seeking to impose restrictions on use of the lake that will prohibit rather than promote use. As a consequence, your proposed SMP for Table Rock Lake could lead to long-term negative impacts on the lake economy.

One of the most concerning factors in the SMP is the failure of the Corps to follow statutorily required public oversight provisions to ensure that the public's voice was heard throughout the process. Section 1185 of the Water Infrastructure Improvements for the Nation Act (P.L. 114-322) requires that the Corps establish an oversight committee comprised of members of the public within 120 days to advise the District Engineer on revisions to the SMP. More than 270 days since enactment, no such committee has been established. Instead the Corps moved forward with proposing a final SMP without the benefit of vital public input through the oversight advisory committee.

I have also heard an overwhelming level of concern from constituents regarding the proposed carrying capacity limit and boat density regulations in the proposal. The carrying capacity argument is based on a number of questionable assumptions. First, the SMP relies on boat density "studies" with no such studies cited, calling into question the validity of this measure. In addition, the boat use survey completed in April 2010 is based largely on anecdotal evidence and uses only a single non-peak weekend day in 2009 to establish a baseline for use. A more vigorous analysis is required to justify such extensive carrying capacity limit and boat density regulations.

The Corps claimed that the moratorium between 2015 and 2017 was necessary to establish a baseline yet, paradoxically, the Corps uses a baseline established in 2010 to generate the future carrying capacity limit. You must know that a limit on the number of access opportunities, based on dubious assumptions, has the potential to do significant long-term damage to public and private use and enjoyment of the lake.

I am concerned that the lack of legally required public oversight has resulted in a SMP filled with troublesome regulations based on insufficient justifications. It is obvious that the burdensome regulations included in the proposed SMP will upend the current balance between uses, place unreasonable limits on property owners, and threaten the economic health of the lake region. Therefore, I urge the Corps to immediately halt the SMP revision process until the oversight advisory committee is convened to provide the input necessary to develop a consensus-based, sustainable plan that protects all users and the long-term economic viability of Table Rock Lake.

Sincere Regards,

A handwritten signature in blue ink that reads "Roy Blunt". The signature is stylized with a long horizontal line extending from the end of the name.

Roy Blunt
United States Senator