



MARTIN COUNTY
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December 17, 2020

Submitted via email: Lisa.E.Aley@usace.army.mil

Lisa Aley
Department of the Army
Jacksonville District Corps of Engineers

Re: LOSOM – Conceptual Plan Evaluation by Sub-Group

Dear Ms. Aley,

The Martin County Board of County Commissioners (the County) appreciates the opportunity to provide comments to the U.S. Army Corps of Engineers (USACE) concerning the 2020 Lake Okeechobee System Operating Manual (LOSOM) Conceptual Plan Evaluation. During the series of sub-group meetings that took place between December 7-11, the USACE asked stakeholders to provide their top three of the schedules generated by the USACE per sub-group by December 17th. On December 7th, the County provided three USACE schedules that would result in the least harmful or damaging consequences to the St. Lucie Estuary and the near shore coral reef tract. The County also provided an additional comment letter in response to a request from the USACE to provide LOSOM schedules for the St. Lucie Estuary sub-group.

As stated in many other comments within the LOSOM / NEPA process, Martin County is concerned with *preventing critical damages* to these marine and estuarine ecosystems caused by forced discharges from Lake Okeechobee and the associated pollution within those discharges. Martin County maintains that zero discharges to the SLE is prudent, attainable, and critical to preventing future harm and allowing the ecosystem to restore itself from the damages done to the SLE from past forced releases from the Lake.

Based on the constraints inherent in the USACE's Pareto Analysis approach, which were further discussed in the County's December 7th letter, the County is focused on scenarios that (a) minimize releases from S308 and (b) maximize the number of days the estuary experiences optimal freshwater inflow conditions. (i.e. 150 to 1400 cfs). Inflow data provided to the County shows that groundwater sources provide at least 150 cfs even during the winter or dry months. Thus, Lake discharges are never necessary for optimal Estuary health.

Nevertheless, utilizing USACE's Pareto Analysis approach that allows only for the USACE's schedules to be analyzed, the County determined that the schedules listed below inflict the least amount of damage to the SLE. Schedules were not provided for the Navigation, South Florida Ecology, or Caloosahatchee

sub-groups because all schedules provided within those groups inflicted more damage to the SLE than the current Lake Okeechobee operational schedule.

Pindex	S308 reg flow	SLE Optimal	Sub-group (Ranking 1-3)
21352	10.37	938	SLE (1)
22780	19.4	934	SLE (2)
22335	20.0	933	SLE (3)
22331	37.5	933	Recreation (1)
20971	51.1	933	Recreation (2)
21002	26.2	936	Lake O Ecology (1)
21513	29.3	933	Lake O Ecology (2)
20601	30.7	934	Lake O Ecology (3)
20619	54.6	929	Water Supply (1)
22602	61.3	930	Water Supply (2)
22112	67.0	926	Water Supply (3)

The County looks forward to continuing to work with the USACE throughout the Conceptual Plan Evaluation and associated LOSOM process and appreciates the opportunity to provide feedback. Should you or your colleagues have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Jim Gorton

jgorton@martin.fl.us

Public Works Director

Martin County Board of County Commissioners