MARTIN COUNTY

BOARD OF COUNTY COMMISSIONERS

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August 18, 2021

Submitted via email: Andrew.D.Kelly@usace.army.mil

Department of the Army
Jacksonville District Corps of Engineers
701 San Marco Boulevard
Jacksonville, FL 32207-8175

Dear Colonel Kelly,

The Martin County Board of County Commissioners (Martin County or the County), on behalf of its businesses and residents, appreciates the opportunity to participate as a stakeholder in the U.S. Army Corps of Engineers' (USACE) development of the Lake Okeechobee System Operating Manual (LOSOM) under the National Environmental Policy Act (NEPA). On August 9th, 2021, USACE announced Alternative CC as the LOSOM Preferred Alternative. Throughout the LOSOM /NEPA process, Martin County has submitted for the Administrative Record, documentation, letters, comments, and presentations demonstrating that discharges from Lake Okeechobee to the St. Lucie River and Estuary (SLE) and the coral reef tract cause harm to these systems. The harm caused by Lake discharges includes degradation of water quality and impacts to habitats for listed and endangered species within the SLE and the coral reef tract that have been irreparable. Lake discharges, especially those containing harmful algal blooms (HABs) and their toxins, impact not only the ecologic health of these systems but also impacts human health. While Alternative CC will not eliminate Lake discharges to the SLE and the reef tract or the harm caused by the discharges, maintaining zero discharges in Zone D is a step in the right direction to lessen the harm. Lessening harm to the greatest extent practicable must be mandatory to protect human health and not further degrade the SLE and the coral reef tract.

Martin County is aware that Caloosahatchee River (CRE) stakeholders have specifically requested that the SLE directly receive additional discharges in Zone D within Alternative CC in order to lessen discharges to the CRE. The rationale being advanced by the other stakeholders is based on an interpretation of data that there is currently some level of equity in management operations. This interpretation is based on the South Florida Water Management District's Restoration, Coordination, and Verification Program (RECOVER) data (at the S-79 structure) to show the stress on certain indicator species from the entire C-43 basin discharges, which include Lake discharges. Martin County performed a similar analysis encompassing all freshwater entering the SLE, which also includes Lake discharges. The SLE RECOVER data was taken from the Roosevelt Bridge monitoring station. This comparison was meant to be an apples to apples analysis. The comparative analysis, attached hereto and titled "Stressful

Counts Analysis," enumerates "counts of events" for Alternative ECBr (Existing Conditions Baseline) and Alternative CC that exceed the RECOVER stressful flow threshold in the CRE and SLE, for daily, 14-day, and monthly averaging periods. The data for ECBr evidences that the SLE has endured far more harm from Lake discharges than the CRE under LORS08 in all averaging scenarios. Additionally, model results for Alternative CC show nearly equal counts of flows that exceed the RECOVER stressful threshold for the SLE and CRE under all averaging scenarios. Alternative CC, as it is, approaches an equitable distribution of harm between the CRE and SLE. If Alternative CC is "optimized" to include additional discharges to the SLE in Zone D as requested by the CRE stakeholders, LOSOM will undoubtedly result in far greater harm to the SLE than the CRE, akin to LORS08, which focused on community safety, and was never intended to achieve balanced harm.

In closing, Martin County reiterates our objection to the concept of sending more water to the SLE within the Alternative CC optimization process. Martin County looks forward to continuing its cooperation with the USACE throughout the remainder of the LOSOM process. Should you or your staff have any questions, please do not hesitate to contact us.

Sincerely,

Jim Gorton
jgorton@martin.fl.us
Public Works Director
Martin County Board of County Commissioners

CC: Tim Gysan, USACE; Eva Velez, USACE; Drew Bartlett, SFWMD; Jacqui Thurlow-Lippisch, SFWMD

Attached: *Stressful_counts_CREvs_SLE_ECBr_CC.pdf*

Stressful Counts Analysis

*Counts of events for **Plan ECBr** (Existing Conditions Baseline) that exceed the RECOVER stressful flow threshold in CRE and SLE, for daily, 14-day, and monthly averaging periods.*

	CRE	SLE	
RECOVER stressful threshold	2100 cfs	1400 cfs	
periods that exceed RECOVER stress limit	count	count	Max possible 52-year count
daily count	5870	7223	18,993 days
daily percent total record	30.9%	38.0%	
14-day event count	555	687	1,352 14-day periods
14-day event count percent of record	41.1%	50.8%	
monthly count	218	293	624 months
monthly percent total record	34.9%	47.0%	

*Counts of events for **Plan CC** that exceed the RECOVER stressful flow threshold in CRE and SLE, for daily, 14-day, and monthly averaging periods.*

	CRE	SLE	
RECOVER stressful threshold	2100 cfs	1400 cfs	
periods that exceed RECOVER stress limit	count	count	Max possible 52-year count
daily count	5515	5450	18,993 days
daily percent total record	29.0%	28.7%	
14-day event count	550	549	1,352 14-day periods
14-day event count percent of record	40.7%	40.6%	
monthly count	232	231	624 months
monthly percent total record	37.2%	37.0%	