



# MARTIN COUNTY

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Submitted via email: [James.I.Booth@usace.army.mil](mailto:James.I.Booth@usace.army.mil)

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

Dear Colonel Booth,

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). The County writes this letter in response to the March 16, 2022 LOSOM Workshop regarding LOSOM Operational Guidance (the Workshop).

The USACE's recent proposal, discussed during the Workshop, sets forth a Lake discharge strategy that prioritizes Lake Okeechobee ecology over the ecology of the St. Lucie Estuary (SLE), the Indian River Lagoon (IRL) and the nearshore coral reef. . , .The ecological recovery of the SLE, the IRL and nearshore coral reef outside St. Lucie Inlet from high volume Lake discharges was never mentioned during the Workshop, regardless of the County's submissions for the administrative record documenting harm from Lake discharges.

Some of the County's previous submissions for the LOSOM administrative record included written comments specifically discussing the harm to sea grasses within the SLE and IRL from Lake discharges. That harm has created a domino effect exacerbating harmful algal blooms (HABs), causing sea grass destruction and resulting in recent and observable mass deaths to manatee populations in the IRL. At the Workshop, the USACE also did not discuss the effects from the nutrient rich fresh water discharges that flow through the chemically distinct estuarine water, through St. Lucie Inlet and out onto the near shore reef. As the USACE knows, approximately 25 % of marine life (food supply) depends on healthy coral life. In this region, coral life and the species dependent upon healthy coral are harmed by Lake discharges which blanket the reef and continued releases makes it impossible for them to recover.

But all of the coastal effects and harm were not of any apparent consequence during the Workshop and during development other LOSOM proposals due to the USACE's legal position that water quality is a state issue, not a federal one. However, after the USACE's addressing of Lake Okeechobee ecology and harmful algal blooms during and leading up to the Workshop, the agency can no longer use the state's water quality

obligations as a shield for the ecological harm its agency actions have on sea grasses, manatees, corals, and the marine habitat created by the corals. If the USACE knows that the Lake water quality is so poor that it needs an ecological recovery strategy to prevent HABs within the Lake and maintain a healthy habitat for Lake species, then it can no longer turn a blind eye to the sea grasses, manatees, and the coral reef, etc. harmed by the discharges of the same poor quality water. This inconsistency is all the more apparent in the context of the recent news reporting on the mass deaths of manatees in the IRL caused by the destruction of the main source of manatee food, sea grasses. Sea grasses are known to die off during and after the USACE's mandated high volume Lake discharges. Yet, the USACE's LOSOM proposal still ignores the Lake's ecological impact on the estuary, the reef, and the species that rely on these habitats for survival.

While the County appreciates USACE's concerns and attempts to address HABs, the current Water Control Plan (WCP) draft includes a proposal that will have only short term effectiveness at best. The draft WCP 1 includes short-term high rates of Lake discharges in order to break up algal blooms in the canal. The County strongly opposes this concept on its lack of long term merit and insofar as it provides another justification for coastal discharges. The US Geological Survey published a study that demonstrated fresh water HABs that are released into saline environments become much more toxic. The proposal would be to blow out HABs in a confined, relatively sparsely populated and contained area into a much denser populated area with intense recreational use and saline water that would significantly increase toxicity of the HAB that was blown out. We ask that this reference be eliminated from the WCP.

The County recognizes the importance and value of managing the Lake for ecological considerations and supports Lake health as fellow members of local governments that have jurisdiction on and near the Lake. Accordingly, the County has been an avid and early supporter of the Comprehensive Everglades Restoration Plan (CERP) which includes projects that will provide the auxiliary water storage features to alleviate the water storage demands placed on the Lake. Until the CERP projects are completed though, the Lake has been the only reservoir for attenuating wet season water for critical dry season demands and preventing the water management failure of wasting harmful flows to the northern estuaries. The County, while enthusiastically and patiently supporting CERP, also maintains its position that Lake discharges to the SLE, the IRL and the nearshore reef remain arbitrarily unaccounted for this late in LOSOM development.

Notwithstanding the foregoing, the County provides the following observations and comments on the USACE's most recent proposals discussed during the Workshop:

The proposed Lake Recovery mode as detailed in the proposed WCP provides for dry season releases of 1400 CFS to the SLE and 2100 CFS releases to the S-79. The County would like to acknowledge and support the distinction of those two respective metering locations as appropriate. It is apparent that RECOVER stressful flow limits were employed to determine these release rates and locations. However, in the presentation the SLE flow rate was defined as a sum of the C-44, C-23 and C-24 locations, which would not account for the total flows to the SLE. The County insists that the determined flow rate for the SLE during Lake Recovery mode would be inclusive of all sources including surface and ground water flows that are currently calculated by the SFWMD using the Linear Reservoir Model. Further, the County does not believe that using RECOVER stressful limits is an apple to apple comparison for both estuaries. A 2100 CFS release to the CRE at the S-79 represents 100 CFS of harmful flow since the primary consideration is salinity and flows of 2000 CFS have proved to be the most beneficial for maintaining healthy ecological salinity levels at Cape Coral as well as Sanibel. The SLE has proven to be in the most

healthy salinity regime with 0 CFS releases and any flow level above 0 is a varying measure of harm from nutrient loading beyond our TMDL, turbidity and muck accumulation, in addition to reduced salinity levels that are proven to impact adult oyster spawn as well as coral spawn.

However, efforts to provide Lake recovery that provide beneficial flows to any other part of the system would not be opposed.

The County also suggests again that the northern estuaries could be de-coupled in regard to operational guidance. If the Caloosahatchee stakeholders believe that the employment of some or all of the suggested operational guidance options are beneficial for them, we would support those being advanced for the Caloosahatchee. Since there is a benefit to a minimal flow of fresh water to the Caloosahatchee but all releases are harmful to the St. Lucie, it may be useful to employ operational guidance options to one estuary and not the other.

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,



Don G. Donaldson  
Deputy County Administrator

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