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February 21, 1014

South Florida Water Management  
Governing Board Members  
3301 Gun Club Road  
West Palm Beach, FL 33406

Dear Governing Board Member:

At the January meeting of the Rivers Coalition, Dr. Gary Goforth, presented a very strong case that more Lake Okeechobee water can be sent south now, somewhat sparing the coastal estuaries until a long term solution can be engineered. We formed a task force to analyze the data and Rivers Coalition is requesting that the South Florida Water Management District (District) send the maximum amount of Lake regulatory releases to the Water Conservation Areas.

For 90 years, the coastal communities of south Florida have sacrificed their health, economy, and environment in order to protect the health, safety and welfare of residents around Lake Okeechobee. In 2013, over 480 billion gallons of South Florida water supply was wasted to tide in the form of extremely harmful Lake Okeechobee regulatory releases.

We strongly recommend that the State of Florida exercise the existing option to purchase lands south of Lake Okeechobee and other lands around the lake to establish a flow way.

We recognize that the responsible management of Lake Okeechobee regulatory releases is complex, and involves both water quantity and water quality issues north, south, east and west of the Lake. We acknowledge and support the District's efforts to reduce the current flow restrictions limiting inflows to Everglades National Park. Many agencies and stakeholders are involved and their input is encouraged.

We feel the long-term solution to reducing the destructive regulatory releases to the St. Lucie River and Estuary, the Caloosahatchee Estuary and the Lake Worth Lagoon (“the estuaries”) is to complete the facilities needed to convey and treat Lake releases to the Water Conservation Areas. However, until long-term solutions are in place, there will be continued destructive regulatory releases to the estuaries, and relief will depend on near-term operational and policy changes.

The 1994 Everglades Forever Act mandated an additional 28 percent more water to be sent to the Everglades, and the vast majority of that water (more than 250,000 acre feet) was to be Lake Okeechobee releases. However, despite an expenditure of more than \$1.2 billion of public funds to construct over 56,000 acres of treatment facilities (STAs), the amount of Lake releases sent to the Everglades has decreased dramatically (Figure 1).

Unlike Lake releases to the Water Conservation Areas (WCAs), regulatory releases to the estuaries receive no water quality treatment. In fact, neither the State of Florida Basin Management Action Plan (BMAP) for the St. Lucie Basin nor the District’s St. Lucie Watershed River Watershed Protection Plan contain projects designed to provide water quality treatment to Lake releases to the estuaries. In addition to blue green algae, the 2013 Lake regulatory releases to the estuaries conveyed more than five million pounds of nitrogen, more than 350,000 pounds of phosphorus, and more than 30 million of pounds of suspended sediment. Nutrient loads conveyed in these Lake releases exceeded five times the Total Maximum Daily Loads (TMDL) for the C-44 Canal, and almost 850,000 pounds more than the nitrogen TMDL for Lake releases to the C-43 Canal. The resulting toxic algal bloom in the St. Lucie River and Estuary caused the department of health to issue human health advisories and advise no human contact with estuary waters. By contrast the WCAs received treated Lake releases, and WCA-1 recorded phosphorus levels of 6-8 parts per billion, while WCA-3A discharged water at 8 ppb to Everglades National Park.

Public funds were expended to re-create flow-through hydrologic conditions in the Holey Land and Rotenberger Wildlife Management Areas (WMAs), with a combined area of over 62,000 acres. However, the amount of Lake releases sent through these public lands have decreased significantly, and in 2013 no Lake releases were sent to these State-owned lands.

Additionally we have separated out a few action items for your consideration below.

## **Section 1. WHEN LORS2008 CALLS FOR RELEASES TO THE WCAs, PRIOR TO REGULATORY RELEASES TO THE ESTUARIES**

1. Establish a goal of sending a minimum of 250,000 acre feet to WCAs before any regulatory releases are made to the estuaries. This may require the district to work with the U.S. Army Corps of Engineers to remove all state and federal policy restrictions to sending regulatory releases to the WCAs (subject to public safety consideration of WCA levee heights). To the maximum extent practical, the intent of these suggestions is that all Lake regulatory releases sent to the WCAs will have received water quality treatment.
2. Send a slow and steady flow of Lake releases south to the STAs at target hydraulic loading rates of 1.5 – 3 cm per day, with a target hydraulic loading rate of 0.5 cm per day for STA-5/6. This will help maintain a minimum of 0.5 foot water depth in the STAs during breeding seasons of ground nesting birds.
3. Send a slow and steady flow of Lake releases south through the Holey Land and Rotenberger Wildlife Management Areas at a target hydraulic loading rate of 0.5 cm per day.

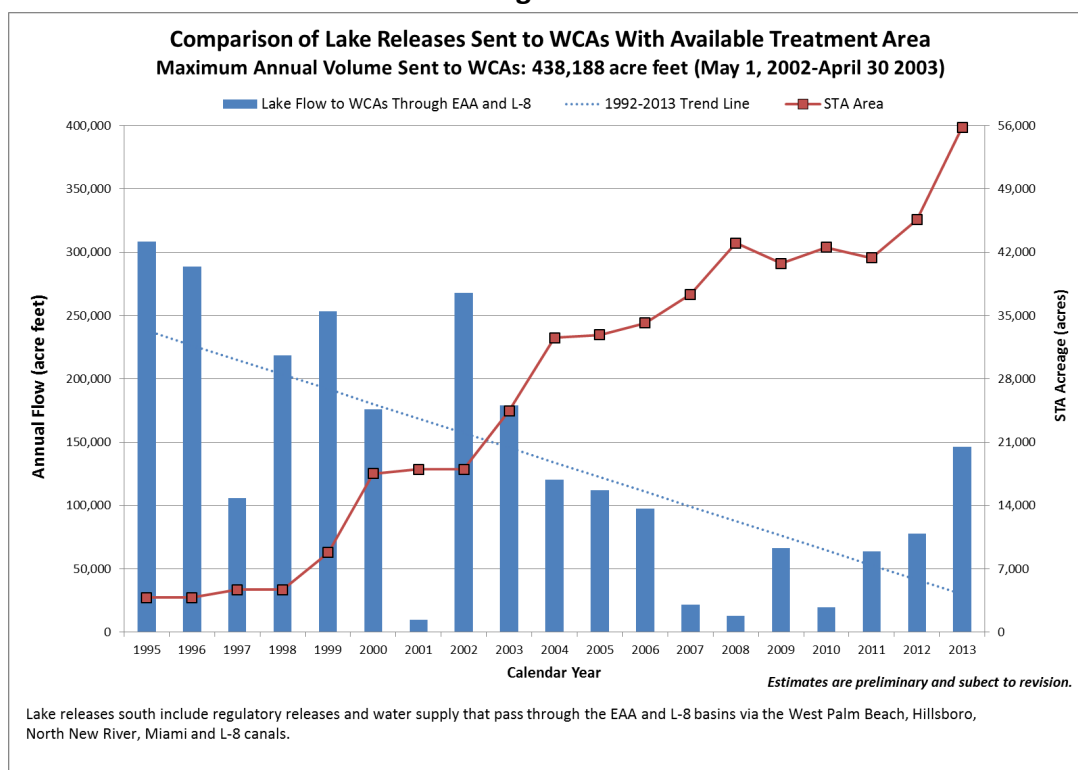
## **Section 2. WHEN REGULATORY RELEASES TO ESTUARIES ARE UNAVOIDABLE**

4. Declare an emergency, and notify permit holders and regulatory agencies of need for emergency operations associated with Lake releases. In addition, alert county health departments when blue green algae is observed in Lake releases.
5. Implement measures to temporarily reduce inflows to Lake Okeechobee.
6. Continue the slow and steady flow of Lake water to the STAs and Wildlife Management Areas.

## **Section 3. OTHER MEASURES**

7. Obtaining a Special Purpose Permits under the Migratory Bird Treaty Act to avoid flow restrictions within the STAs due to ground nesting birds.
8. Assist the U.S. Army Corps of Engineers to expedite an updated risk assessment of the Herbert Hoover Dike and use the results to re-assess and update LORS 2008, especially to allow occasional deeper Lake levels under emergency conditions that necessitate regulatory releases to the estuaries.

**Figure 1.**



Thank you very much for your consideration and we are looking forward to your response. It is my understanding that Gary Goforth and Kevin Henderson will have an opportunity and ample time to present our perspective and data at the next WRAC meeting.

Sincerely,

Leon Abood, Chairman  
 Rivers Coalition