



On behalf of the Water Protection Network (WPNetwork), thank you for the opportunity to provide these comments regarding steps that we believe would further the Environmental Advisory Board's (EAB) recommendations on environmental flows.

The Water Protection Network is a coalition of over 230 national, regional and local organizations working to advocate for water projects and policies that are environmentally and economically sound. We applaud the EAB's recent focus on environmental flows, specifically the Chairman's Letter on Environmental Flows dated November 2015, and agree that attention to the sustainability and resilience of environmental flows is crucial for healthy ecosystems. We urge the EAB to make recommendations driving the Corps' planning and project recommendations to ensure the resiliency and sustainability of environmental flows.

For the EAB's consideration, The WPNetwork believes that the EAB could provide critical insight to the Corps on the Apalachicola-Chattahoochee-Flint River Basin (ACF) water control manual, which is currently in draft form. As highlighted in the Chairman's Letter, environmental flows are critical for the sustainability and resiliency of healthy ecosystems. Unfortunately, the Corps' draft ACF water control manual fails to ensure ecological flows for this vital ecosystem. To the contrary, despite the desperate needs of the Apalachicola River, Floodplain, and Bay for more freshwater flows, the draft ACF water control manual would hold even more water back for upstream users, initiate drought restrictions earlier and more frequently, and severely restrict flows to the Apalachicola River more often and for longer periods of time. This will make the ecological conditions even worse in the Apalachicola River, floodplain, and bay.

We urge the EAB to engage and take an active role in developing and making specific recommendations for the ACF River Basin to improve environmental flows; specifically, recommendations that develop and select an alternative that mimics the natural flows of the Chattahoochee and Apalachicola Rivers to the maximum extent practicable.

The Apalachicola River and its floodplain form an incredibly rich and diverse system of exceptional ecological importance. More than 131 species of fresh and estuarine fish live in the Apalachicola River, more than any other river in Florida. More than 50 species of mammals, including the Florida black bear and the endangered West Indian Manatee are found in the Apalachicola drainage basin. More than 40 species of amphibians and 80 species of reptiles live within the Apalachicola River basin, the highest diversity of amphibians and reptiles in the United States and Canada. More than 1,300 species of plants, including 103 that are threatened or endangered, are also found in the Apalachicola drainage basin. Sufficient and properly timed freshwater flows are critical for this rich array of species and for maintaining the estimated \$5 billion in free services provided by the Apalachicola ecosystem, including clean water, flood protection, and fish and wildlife habitat.

The Apalachicola River is the lifeblood of the Apalachicola Bay, an estuary of major ecological and economic importance to the eastern Gulf of Mexico. Sufficient freshwater flows are essential for maintaining the salinity regimes needed to sustain an economically viable oyster harvest from the Apalachicola Bay, and for sustaining many other commercially viable fisheries. Apalachicola Bay

provides 90 percent of Florida's oysters and over 13 percent of the total oyster production in the United States. It is also a major nursery for shrimp, blue crabs, and many species of fish including striped bass, sturgeon, grouper, snapper, red fish, speckled trout, and flounder. The commercial and recreational fisheries in the Gulf of Mexico generate over \$5 billion dollars in sales revenue and support over 50,000 jobs in West Florida. The harvest of shrimp, crab, fish, and oysters is the driving force in the economy of Franklin County, Florida.

Despite the importance of this incredible ecosystem, the ACF system has been managed for decades in a way that adversely alters the quantity and timing of freshwater flows and starves the system of the flows it needs to thrive. This mismanagement has pushed the Apalachicola River, floodplain, and bay to the brink of collapse. For example, lack of sufficient flows have led to the loss of more than 4.3 million floodplain trees and harmed the tourism, recreation, and other businesses that rely on a healthy Apalachicola River. Lack of freshwater flows led to the collapse of the bay's rich oyster population leading to a devastating loss of income for the region. In 2013, the Secretary of Commerce declared a commercial fishery failure for the oyster fishery to help alleviate the economic hardship.

Continuation of this status quo is neither sustainable nor acceptable. As Florida's Deputy Secretary of the Department of Environmental Protection recently testified, if we do not restore historic flow patterns to the Apalachicola River, "the ecosystem and, indeed, the very way of life for generations of Floridians will be devastated."¹

The Conservation Community has urged the Corps to develop and select an alternative that: (1) mimics the amount, timing, and variability of natural flows to the Chattahoochee and Apalachicola Rivers, to the maximum extent practicable; (2) restores river reaches where bed degradation or other changes are causing lower water levels; and (3) makes use of tools such as a drought indicator index, real-time weather forecasting, and/or satellite imagery to adapt operations to actual weather conditions. Such an alternative is essential for restoring and maintaining the health of the Chattahoochee River, the Apalachicola River, the Apalachicola River Floodplain, and the Apalachicola Bay. Preliminary modeling carried out in developing the ACF Stakeholders *Sustainable Water Management Plan* demonstrates that changes in reservoir storage and operations, along with water efficiency and conservation measures, "could simultaneously improve instream flows that sustain aquatic habitats in the Basin and the Apalachicola Bay while providing for both current and future consumptive uses.

The Corps has the authority and responsibility to adopt such an alternative given its fish and wildlife conservation authorized purpose, the National Water Resources Planning Policy, and a host of Congressional directives that require and/or promote the protection and restoration of the nation's waters and fish and wildlife resources. The EAB's recommendation to develop and select an alternative that mimics natural flows to the Chattahoochee and Apalachicola Rivers to the maximum extent practicable would be crucial in reassuring resilient and sustainable environmental flows.

In conclusion, environmental flows are critical for the sustainability and resiliency of healthy ecosystems. The Apalachicola River is the lifeblood of the Apalachicola Bay, an estuary of major ecological and economic importance to the eastern Gulf of Mexico. Sufficient freshwater flows are essential for maintaining the salinity regimes needed to sustain an economically viable oyster harvest from the

¹ Testimony of Jonathan P. Steverson, Executive Director of the Northwest Florida Water Management District, "Effects of Water Flows on Apalachicola Bay: Short and Long Term Perspectives", United States Senate Committee on Commerce, Science and Transportation Field Hearing, August 13, 2013 at 4.

Apalachicola Bay, and for sustaining many other commercially viable fisheries. The Water Protection Network would like to continue exploring opportunities for working with the EAB to help achieve systemic improvements in the Corps planning.