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September 9, 2024

Mr. Paul Schilling
Growth Management Director
Martin County Administrative Center
2401 SE Monterey Rd
Stuart, FL, 34994

Subject: CPA 24-10; Sanitary Sewer Services

Dear Mr. Schilling:

The Guardians of Martin County appreciate the efforts of staff and consultants to make improvements to Chapter 10 of the Comprehensive Plan as part of the Evaluation and Appraisal Report process. We have reviewed the proposed Amendments and offer the following comments:

Section 10.1.A (final paragraph)

Until such time as all areas of all Community Redevelopment Areas have full Sanitary Sewer Services, the Guardians request that this paragraph not be deleted. It is our opinion that providing sewer services within the CRAs is a higher priority than extending services to other areas within the Urban Service Districts and areas outside the USD.

Policy 10.1B.5 Residential Levels of Service (Un-numbered Table)

Wastewater Treatment Systems are designed to treat pathogens, but have minimal effects on nutrient concentrations, which are a leading cause of the deterioration of waters in Martin County. The Guardians would like an explanation of why current Level of Service of 100 gallons per capita per day, for both residential and non-residential purposes, should be increased to 195 gpd.

Please distribute this correspondence to the members of the Local Planning Agency, existing County Commissioners, Commissioners-elect, and the TCRPC consultant, and add it into the Record for NPH-2, Comp Plan Amendment # 24-10.

Thank you for your consideration. If you have any questions and/or your consultants would like to discuss any of these suggestions, please feel free to reach out to me at (561)-758-3417, by e-mail at ExecDirector@theguardiansofmartincounty.com or at the letterhead address.

Sincerely,

D. Greg Braun

D. Greg Braun
Executive Director

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September 9, 2024

Mr. Paul Schilling
Growth Management Director
Martin County Administrative Center
2401 SE Monterey Rd
Stuart, FL, 34994

Subject: CPA 24-13 Drainage and Ground Water Aquifer Recharge

Dear Mr. Schilling:

The Guardians of Martin County appreciate the efforts of staff and consultants to make improvements to Chapter 13 of the Comprehensive Plan as part of the Evaluation and Appraisal Report process. We specifically acknowledge and appreciate the addition of verbiage in several sections regarding Sea Level Rise and its consequences. We have reviewed the proposed Amendments and offer the following comments/suggestions:

Section 13.1.C(1) Paragraph 2, Control of Water, Lines 4-7. The Guardians request that an acknowledgement be added reflecting that Sea Level Rise also exacerbates conditions of saltwater intrusion. Specifically, we request the following insertions, using strikethrough and underline formatting:

As sea level rises, saltwater intrusion is exacerbated, and flood risks increase within the areas that tidally discharge for are connected to tidal areas. Consequently, saltwater intrusion, flood protection and the level of flood protection must be considered in water management as well as future flood risk associated with sea level rise, as applicable.

As a result in inaction on the part of Martin County and the State of Florida in acquiring lands in the headwaters with the footprint of the Comprehensive Everglades Restoration Plan (CERP) and within the Optimal Boundaries of Jonathan Dickinson State Park and the Atlantic Ridge Preserve State Park, the Guardians have partnered with The Conservation Fund and the Treasured Lands Foundation, a Hobe Sound based non-profit land trust, to create the Loxa-Lucie Headwaters Initiative.

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We have engaged the community in this effort, completed acquisition of two parcels, and have initiated fundraising on a third parcel, all with the goal of creating a permanently-protected ecological corridor between the South Fork of the St. Lucie River and Kitching Creek and the Loxahatchee River. As such, we are keenly aware of the need to protect and/or restore base flows into these and the Indian River Lagoon.

We therefore object to the total deletion of Policy 13.2A.11, and request that it be amended, as follows:

Policy 13.2A.11 Protection of base flow needs, Martin County shall protect the base flow needs of the estuary. ~~and monitor the Everglades settlement to ensure protection of base flows.~~

Additionally, the Guardians are concerned that, in spite of extensive efforts to address existing water quality deficiencies, the quality in many of our surface waters has continued to deteriorate. While existing Policy 13.4A.4 identifies that protecting water quality in the South Fork of the St. Lucie Estuary is a “Project Priority”, recent actions of approving large-scale-developments without requiring water quality monitoring is counter-productive to this stated priority. We therefore request the following modification:

Policy 13.4A.4. Project priority. Martin County shall give highest priority to projects that reduce harmful impacts on the St. Lucie River. Martin County will require continuous in-stream water quality monitoring for all new development projects that discharge into the St. Lucie Estuary. Monitoring parameters shall include, but not be limited to nutrients, heavy metals, coliform, herbicides and pesticides and their breakdown components, pharmaceuticals, PFOS and PFAS. Monitoring of discharge waters shall be initiated prior to the initiation of construction and continue for a minimum period of one year following build-out of the facility. If the monitoring reveals that discharge from the facility fails to meet applicable state water quality standards and/or adversely affects water quality in the receiving body, the property owner shall have the responsibility to perform whatever corrective actions that may be needed to permanently address the deficiency(ies).

Please distribute this correspondence to the members of the Local Planning Agency, existing County Commissioners, Commissioners-elect, and the TCRPC consultant, and add it into the Record for NPH-5, Comp Plan Amendment # 24-1212.

Thank you for your consideration. If you have any questions and/or your consultants would like to discuss any of these suggestions, please feel free to reach out to me at (561)-758-3417, by e-mail at ExecDirector@theguardiansofmartincounty.com or at the letterhead address.

Sincerely,
D. Greg Braun

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Executive Director
The Guardians of Martin County

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BERNHARD M. AUER

September 10, 2024

Mr. Paul Schilling
Growth Management Director
Martin County Administrative Center
2401 SE Monterey Rd
Stuart, FL, 34994

Subject: CPA 24–11 Potable Water Services

Dear Mr. Schilling:

The Guardians of Martin County appreciate the efforts of staff and consultants to make improvements to Chapter 11 of the Comprehensive Plan as part of the Evaluation and Appraisal Report process. We have reviewed the proposed Amendments and offer the following comments:

Section 11.2.D. Issues in potable water management. Water issues emerging from current conditions in Martin County, are as follows (not in priority order): ...

A water-quality related issue that has emerged since the last EAR process is an increasing knowledge and awareness of the detrimental health-related effects of Perfluorooctanesulfonic acid substances (PFOS) and Polyfluoroalkyl substances (PFAS).

It is the Guardians' understanding that Martin County is not currently engaged in systematic testing for PFOS and PFAS in the supply of potable water that the County provides to the customers of the County's utilities. It is additionally our understanding that there is no testing for PFOS and PFAS in the Irrigation Quality (IQ) water that is disseminated from the County's wastewater treatment system for irrigation use throughout our community.

There is an ever-increasing scientific and legal (see City of Stuart v 3M Co., City of Camden v. 3M Co.) database regarding the potential adverse impacts of these substances on human health. The Guardians believe that this is significant enough of an issue that it merits being added as an additional item (9) in Section 11.2.D, and we suggest the following:

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11.2.D.(9). Perfluorooctanesulfonic acid substances (PFOS) and Polyfluoroalkyl substances (PFAS) have been increasing known to cause adverse health effects in humans, and testing for these substance is not currently performed in Martin County by the State of Florida, Martin County or any of the other public utilities for potable water and Irrigation Quality (IQ) water that is supplied by Martin County’s utilities.

After identifying this emerging issue in Section 112.D, the Guardians request that this subject also be addressed in a new Policy, under Goal 11.1 and Objective 11.1A as follows:

Policy 11.1A.1 new (5) Development and implementation of a testing/monitoring protocol to determine the concentrations, if any, of PFOS and PFAS in waters being supplied to customers of Martin County’s Utilities.

If testing for PFOS and PFAS in the County’s water supply reveals that corrective action is warranted to protect human health, and if such corrective actions require funding as a Capital Improvement Project, the Guardians request that Policy 11.1A.3 be amended, if necessary.

Please distribute this correspondence to the members of the Local Planning Agency, existing County Commissioners, Commissioners-elect, and the TCRPC consultant, and add it into the Record for Comp Plan Amendment # 24-11.

Thank you for your consideration. If you have any questions and/or your consultants would like to discuss any of these suggestions, please feel free to reach out to me at (561)-758-3417, by e-mail at ExecDirector@theguardiansofmartincounty.com or at the letterhead address.

Sincerely,

D. Greg Braun

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