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September 11, 2018

Federico Fernandez, Chairman  
South Florida Water Management District  
P.O. Box 24680  
West Palm Beach, FL 33406

*Transmitted via email [fefernan@sfwmd.gov](mailto:fefernan@sfwmd.gov)*

Re: Caloosahatchee MFL Rule

Dear Chairman Fernandez:

The undersigned write in opposition of the proposed Caloosahatchee Minimum Flow and Level (MFL) rule as drafted. Local scientists and technical representatives have been unanimous in their opposition and recommendations throughout the rule making process.

We appreciate the staff time and extensive scientific input that has gone into updating the proposed MFL. However, the rule does not provide adequate dry season flows to the Caloosahatchee that are necessary to meet the ecologically based salinity targets and will result in further harm to the estuary.

Estuarine research and real-time monitoring of flow and salinity data within the river and estuary clearly indicate that the proposed flows of 400 cfs are not sufficient to meet the salinity target of 10 psu at the Fort Myers Yacht basin. Instead, estuary monitoring of flow and salinity suggest flows of approximately 720 cfs are necessary to meet the MFL. Implementation of the proposed rule will compound the habitat losses that have occurred over the past 17 years.

Over the past 17 years with the existing MFL in place, the Caloosahatchee has permanently lost over 1,000 acres of freshwater tape grass habitat. In that time, the District has not demonstrated the ability to implement measures that would allow the estuary to recover as defined in the rule. The proposed rule will result in the continued loss of the remaining functional freshwater habitat in the upper Caloosahatchee estuary.

Finally, given that the modeling benefits depend upon the availability and operation of the Prevention and Recovery Strategy —the C-43 West Basin Reservoir— and given that that project is at least four years away from completion (2022), we suggest delaying rule adoption until a pilot project can assess estuary conditions over the next two years, before reservoir operational testing begins. Flow monitoring stations being installed by Lee County and the FDEP in the Caloosahatchee may help quantify flow contributions and resolve some of the issues related to flow and salinity in the upper estuary.

Our river, estuary, and coastal waters routinely experience harm from both high and low flows, unlike any other system. The ongoing water management issues associated with the Caloosahatchee are having significant and lasting economic impacts on our communities. We strongly urge you to consider our request and not adopt the rule as proposed.

Sincerely,  
*Signatures waived to expedite delivery*

Kevin Ruane, Mayor  
City of Sanibel

Joe Coviello, Mayor  
City of Cape Coral

Randall P. Henderson Jr., Mayor  
City of Fort Myers

Peter Simmons, Mayor  
City of Bonita Springs

Tracey Gore, Mayor  
Town of Fort Myers Beach

Jim Boesch, Mayor  
Village of Estero

Joseph E. Orndorff, President  
The Island Inn Company

Christopher W. Heidrick, Owner/ Principal  
Heidrick & Co Insurance

Chris Davison, General Manager  
Island Inn

Marcel Ventura, Pres.  
YOLO Watersports, Inc.

Dave Jensen, Owner  
Jensen's Twin Palm Resort and Marina  
Jensen's on the Gulf

Marty Harrity, Owner  
Doc Ford's Rum Bar and Grille (3)  
Sanibel- Ft Myers Beach-Captiva

Tony Lapi, President & CEO  
Sanibel Captiva Beach Resorts

Mark Marinello, Owner  
Dixie Fish Company  
The Beached Whale  
HM Restaurant Group

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Sanibel & Captiva Association of Realtors

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Tarpon Bay LLC

Anne Joffe, Owner  
She Sells Sea Shells

Mark Anderson, Owner  
Benchmark General Contractors

John & Denice Beggs, Realtors  
Realtors The Burns Family Team at Premier  
Sotheby's International Realty

Michael Miller, President  
Committee of the Islands

Valerie J. Tutor, Realtor  
Kingfisher Real Estate Inc.

J. Thomas Uhler, Financial Planner  
J. Corey Vertich, CFP  
Uhler and Vertich Financial Planners, LLC

Doug Babcock as General Manager  
Sanibel Captiva Island Vacation Rentals

Bubby Howell  
Captain Bubby's Island Tours

Paul Garvey ,Executive Director  
Captiva Civic Association

Dustyn Corace, PA  
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Mark McQuade, CEO/President  
Mark McQuade General Contractor

Matt Asen  
The Timbers Restaurant & Fish Mkt  
Matzaluna Italian kitchen

Jeff McDermott President  
Kingfisher Vacations, Inc.

Capt. Myton Ireland, President  
Sanibel Marina

Phillip Starling, General Manager  
Perry Thompson, Owner  
2 Islands Gallery, Captiva

Brad Junghans, Owner  
Captiva Cruises Inc.  
McCarthy's Marina Inc.

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Past President, Sanibel Captiva Islands  
Association of Realtors

Mary Ann Williams ,President  
Landmark Design of Sanibel

Michael Billheimer, Proprietor  
Lighthouse Cafe of Sanibel

Bill Greggs, Principal  
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Ken Boyce, Inventor & CEO  
K & K Super – Blend® Fertilizer

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Ken Sneed, Owner  
Ken Sneed & Associates

Patrick Higgins, Owner  
Coast to Coast Insurance

Tracy Woods, Owner  
Tracy Woods Specialties

Shawn Kelly, Owner  
Captain Shawn's Fishing Charters

J.D. Hollway, Owner  
Waterfront Restaurant

Jeff Young, Owner  
United Tool

Jesse Romero, Owner  
Florida Saltwater Fishing Ent.

Katie McCormick, CFO  
Diversified Environmental Services

Jennifer Dorning, Manager  
Tradewinds Insurance Group

Mark Futch, Owner  
Boca Grande Seaplane Charters

Frank Jensen, Owner  
Coast2Coast Home Inspections

Tom Markle, Owner  
Suncatcher Surf Shop

Jeff Zasadny, Owner  
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Robert Adamski, Partner  
Burandt,Adamski,Feichthaler,Sanchez, PL

Keith McMenamy, Manager  
VIP Rentals

Andreas Bieri, Owner  
Green Flash Restaurant  
Mucky Duck Restaurant

John Biffar. President  
Wilson Hawthorne, Producer  
Dreamtime Entertainment

Dieter Reichardt, Owner  
Sea Wave Boat Rentals

Mike Mullins, Owner  
Our Captiva, LLC

Phillip Starling, General Manager  
Sundial Beach Resort and Spa

Holly D. Smith, Owner  
Gumbo Limbo Mgmt and Development, LLC  
Holiday Inn Express, Cape Coral  
Suburban Extended Stay Hotel, Ft Myers

Kate Sergeant, Owner  
Ann Eve McDonald, Owner  
On Island

Mary & Fred Bondurant, Realtors  
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Manatee and Eco River Tours

Richard Johnson, Owner  
Bailey's Center LLP

Mead Johnson, Owner  
Bailey's General Store

Calli Johnson, Principal  
Island Cinema

Bailie Johnson, Principal  
Sanibel Catering Company

Dane Johnson, Principal  
Bailey's MarketPlace

cc: Melanie Peterson, SFWMD  
Sam Accursio, SFWMD  
Rick Barber, SFWMD  
Carlos Diaz, SFWMD  
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