



May 2, 2025

Col. Bowman
District Commander
701 San Marco Blvd
Jacksonville, FL 33207

RE: Reductions in Flows to the Caloosahatchee Estuary

Dear Col. Bowman,

SCCF was alarmed to see the reduction in flows from Lake Okeechobee to the Caloosahatchee estuary. As the end of dry season nears, we urge you to thoughtfully consider the delicate salinity balance required in the Caloosahatchee estuary for oyster spawning to be successful and to ensure the survival of critical species with specific salinity tolerances. In recent weeks as the target pulse schedule at S-79 has been lowered, ending in the current schedule of a 650 cfs pulse, local estuary salinities have been rising quickly. Data collected at Shell Point the week of April 15, following a lowered pulse schedule to a 650 cfs target reflected a weekly average salinity of 29 psu. The optimum salinity envelope for oysters as outlined in RECOVER 2020 metrics is 10-25 psu, meaning salinities quickly surpassed this target range following the revised flow schedule. The following week, data from this same location reflected an average salinity of 31 psu, while still at a target pulse schedule of 650 cfs. The coming weeks are critical for oyster health and survival in the Caloosahatchee estuary, as oysters will enter their spawning season. Successful oyster reproduction relies on the estuary maintaining the correct salinities, which have already been surpassed and will continue to rise if flows from Lake Okeechobee are lowered further. If oysters miss the window for successful reproduction, their populations will be hindered for generations to come.

Oysters provide essential ecosystem services in terms of water filtration, providing suitable habitat for marine life and protecting shorelines, all indispensable to healthy communities and economies in Southwest Florida. Additionally, Tape grass is hugely reliant on specific salinities and is adversely impacted by lowered flows. Tape grass provides invaluable benefits to the ecosystem and communities surrounding the estuary. This keystone species provides nursery habitat for fish and invertebrates, are the primary food source for many marine species, and improve water clarity and prevent erosion. Already our tape grass population has suffered from degraded water quality and further disruption would be catastrophic. Disruptions to species reliant on optimum salinities like oysters and tape grass have far-reaching and long-lasting impacts to our local communities. Missed spawning seasons or mass die-offs to these species make our shorelines less secure during hurricanes, our fisheries and therefore economies, less productive and our water quality significantly less healthy. Data shows that regaining optimum salinities is much more difficult after a period of intensely elevated salinities than doing so after a period of low salinities. Therefore, there are low chances for the estuary to return to the required salinities following an extended period of flows under 750 cfs (RECOVER optimum envelope), which is a critical consideration with the oyster spawning season currently underway.

While we understand the pressures facing the system with a lowered lake thanks to a wildly successful Lake Recovery Operation, further reducing flows would result in immediate harm to the estuary. We understand the thinking that by lowering flows to the estuary we can prolong the time before reaching the water shortage management band, but the harm experienced in the estuary is ongoing and

will get immediately worse. For the health of the estuary, understanding that if the rains do not start we will likely be cut off from the lake in two week anyway, it would be better to maintain flows in the optimum envelope and reevaluate as we approach the water shortage management band. Climatologically the rainy season starts in south Florida on May 15th, and it would be better to have two weeks of flows and then absorb the harm rather than take the harm now. If the rains do not come we will see massive harm to the estuary regardless of what actions are taken now, but by protecting our flows we can be in a position to recover. If you cut us off now, it may not matter if we get rains in two weeks, as the damage will have been done. It is also not gone without notice that other stakeholders don't seem to be shouldering this drought burden, and it's hard to watch the estuary suffer while lawn irrigation is still occurring on the opposite coast. Counter to the proposed action you have announced, west coast stakeholders recommended increasing flows this week to make up for the damage we are seeing in our estuary.

Water quality drives Southwest Florida's tourism-based economy and its significance cannot be overstated, especially as our communities continue to recover from multiple storm events in recent years. That being stated, we urge water managers to consider the delicate balance the Caloosahatchee estuary relies upon when managing S-79's flow schedule and the harmful effects elevated salinities will have on dependent species and communities for generations. With the coming weeks and months being a critical period for maintaining correct salinities in the estuary and predictions for increased rainfall beginning in May district-wide, we strongly suggest a flow schedule based on optimum flows and salinities outlines in RECOVER 2020 metrics.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt DePaolis". The signature is written in a cursive, somewhat stylized font.

Matt DePaolis
Environmental Policy Director