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September 1, 2017

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Ms. Toni Edwards, Senior Scientist
South Florida Water Management District
Transmitted by email: tedwards@sfwmd.gov

Re: Public Peer Review Session for the Caloosahatchee MFL Reevaluation

Dear Ms. Edwards:

Thank you for the opportunity to provide input and feedback with regard to the South Florida Water Management District's update and reevaluation of the Minimum Flow and Level (MFL) for the Caloosahatchee River. Lee County would like to offer the following suggestions:

1. The method used to derive the 400 CFS proposed MFL using the concept of dynamic habitat overlap will by default not provide enough water to prevent an exceedance of the salinity at Fort Myers. Using an average or median from several models and measured data, with no regard for error, will provide inadequate flows 50% of the time. Measured flow data verses salinity at Fort Myers has shown that the current 450 and 650 CFS is not enough during common hydrological conditions. At a minimum, the error should be built into the proposed MFL to allow for differing hydrologic conditions.
2. Measured data should be used as opposed to modeled data when available. We see no justification in averaging modeled data with real data for the same parameter. For example, Val Data and Val Model are both present, and used in the calculated proposed MFL. Why use the modeled data for the MFL when we have better measured data available for the calculation?
3. We can find no scientific reason to use 55 consecutive days for salinity concentrations, opposed to the 30-day average of the current MFL, which does have a scientific basis. Please provide the backup for this assumption.

Finally, there was discussion at the peer review workshop on the value of incorporating water quality modeling when evaluating the flow needed to maintain a healthy ecosystem. Concurrent with this process, the Florida Department of

Environmental Protection is updating the TMDL/BMAP model. We urge SFWMD staff to collaborate with FDEP, who has developed a calibrated model of the Caloosahatchee River estuary for TMDL purposes.

Should you desire the opportunity to discuss these comments in more detail, please do not hesitate to contact me.

Sincerely,



Roland Ottolini
Director, Lee County Natural Resources
(239) 533-8109

Cc: Keith Kibbey, Lee County Division of Natural Resources
Kurt Harclerode, Lee County Division of Natural Resources
Dan DeLisi, DeLisi Inc.