



May 23, 2022

Drew Bartlett, Executive Director
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33406
DBartlett@sfwmd.gov

RE: Draft Operation Plan for Emergency Pumps in the City of Bonita Springs

Dear Mr. Bartlett,

As conservation easement holders of the western preserve that borders the Esplanade Golf and Country Club development (formerly known as Mirasol), Audubon Florida, Audubon of the Western Everglades, Conservancy of Southwest Florida and Florida Wildlife Federation are dedicated to the protection of the natural wetlands within the Cocohatchee slough (also known as Woodland Slough). We are writing in response to the Draft Operation Plan for Emergency Pumps in the City of Bonita Springs, dated May 4, 2022 and delivered to the City of Bonita Springs, under the February 4, 2022 cooperative agreement between the city and the South Florida Water Management District. Emergency pumping under the parameters of this operation plan will impact the Cocohatchee slough and protected preserves/mitigation lands, including those under easement with our organizations. While we very much appreciate the ongoing outreach and communication regarding this draft operation plan by the District and Big Cypress Basin staff, our concerns regarding the ecological impacts of such pumping have not been addressed. Therefore, before finalizing, we ask the District to conduct a full environmental analysis on the impact of pumping untreated floodwater into the Cocohatchee system and to assess the potential hydrologic impacts to upstream wetlands and water resources from storm-response drainage operations.

The draft operation plan establishes guidelines for the emergency pumping of floodwater south from the Logan Boulevard Canal into Collier County to alleviate flooding in developments east of I-75 and south of Bonita Beach Road. These guidelines set maximum volumes to avoid flooding in the Cocohatchee system. While the plan seeks to balance the needs of Bonita Springs and protect the water levels in the Cocohatchee Canal, it is singularly focused on water quantity and therefore, it ignores the direct and secondary environmental impacts to the receiving system, as well as fails to consider hydrologic impacts to upstream wetlands and water resources. The operation plan does not address the water quality and volumetric impacts of pumping untreated floodwater at a rate of 65 cfs (or greater, potentially up to 90 cfs) directly into protected preserves also encumbered by conservation easements and required mitigation areas. This is a large volume of untreated water that could be pumped for days into the preserves and the Cocohatchee system. The environmental analysis must address the ecological effects of adding

this volume of water to preserve areas, including direct discharges to wetlands, potential channeling and inundation, altered hydroperiods, and effects on the foraging habitat of listed species and other wildlife. Moreover, this untreated floodwater will ultimately discharge into the Cocohatchee River and out to Wiggins Pass, designated Outstanding Florida Waters and estuarine ecosystems, at a time when this system would already be at its maximum.

Additionally, the District must not conflate the restoration of historic regional flowways in South Lee County with the emergency pumping of untreated floodwater. Emergency pumping under the draft operation plan will only temporarily alleviate flooding in select developments in Bonita Springs. This should not be standard operating procedure and does not address the larger factors contributing to flooding across the city. The District, Bonita Springs, and the Florida Department of Environmental Protection (FDEP) must take a hard look at permitting future development projects that would put additional flood protection demands in the floodplain, the Imperial River system and the city's stormwater management system, and work to identify sustainable solutions.

We appreciate District staff's time and willingness to present the technical information used to create the draft operation plan, as well as their responsiveness to our questions and concerns. Continued coordination with all stakeholders, including FDEP, Collier County, private property owners, conservation easement holders, and the public, is key to ensuring proactive solutions. As such, we ask that a full environmental analysis be completed and presented to all stakeholders before moving forward with finalizing and approving this operation plan.

Thank you for your time and consideration, and please feel free to contact us to discuss this issue further.

Sincerely,

Jessica P. Wilson, Ph.D.
Senior Water Policy Specialist
Conservancy of Southwest Florida
jessicaw@conservancy.org

Meredith Budd
Regional Policy Director
Florida Wildlife Federation
meredithb@fwfonline.org

Brad Cornell
Southwest Florida Policy Associate
Audubon Florida
bcornell@audubon.org

Eileen Arsenault
President
Audubon of the Western Everglades
audubonwe@live.com

cc: Shawn Hamilton, Secretary, FDEP
The Honorable Adam Botana, Representative, Florida House of Representatives
Collier County Board of County Commissioners
Big Cypress Basin Board
Jennifer Smith, Chief of Staff, SFWMD

Lisa Koehler, Administrator - Big Cypress Basin, SFWMD
Akin Owosina, Bureau Chief - Hydrology and Hydraulics, SFWMD
Phil Flood, Regional Representative, SFWMD
Arlene Hunter, City Manager, City of Bonita Springs
Matt Feeney, Assistant City Manager, City of Bonita Springs
Trinity Scott, Deputy Department Head, Collier County