



CONSERVANCY Of Southwest Florida

*Preserving Southwest Florida's
natural environment and
quality of life ... now and forever.*

May 21, 2009

Steve Sentes, Lead Project Manager
South Florida Water Management District
2301 McGregor Blvd.
Ft. Myers, FL 33901

**RE: South Lee County Watershed Plan Update Study 90% Deliverable
(SFWMD Contract No. 4600000791-WO01)**

Dear Mr. Sentes:

The Conservancy of Southwest Florida on behalf of our over 6,000 members would like to submit the following comments for your consideration relating to the South Lee County Watershed Plan Update Study 90% Deliverable (SFWMD Contract No. 4600000791-WO01).

We want to thank the South Florida Water Management District and Lee County for undertaking this study. We immensely value and appreciate the investments made to ensure that we have a good scientific basis for water management decisions in the region. The modeling has provided this basis, and as such, should be used for developing the recommendations going forward.

However, we are deeply concerned with the 90% Final Draft report, which proposes additional culverts under I-75 at Halfway Creek that are clearly acknowledged as unnecessary based on the scientific modeling associated with this study. The Conservancy as well as Lee County and community stakeholders understood that we were operating under an agreement with the South Florida Water Management District (SFWMD), whereby the SFWMD and Lee County would utilize the final report and the scientific results of this study to guide decision-making as to whether additional culverts were necessary and should be installed under I-75 at the Halfway Creek junction. However, we have confirmed that the SFWMD had already requested that the Florida Department of Transportation submit a permit modification for the installation of culverts prior to the completion of this study and the opportunity for public input and consideration. We emphatically request that the SFWMD work with all the stakeholders involved, use the science to finalize the report recommendations, and incorporate public input on this matter. Thus, we submit the following comments for your consideration:

The Update to the South Lee County Watershed Plan Was Necessary and Instrumental for Providing Scientific-based Water Management Recommendations

In reviewing the 90% Final Report of the South Lee County Watershed Plan Update Study, it is apparent that the Update to the SLCWP was necessary because of several changed conditions on the ground in the watersheds. First, many of the changes recommended in the 1999 Plan were implemented, resulting in improvements in flows and stages. Second, there have been numerous changes in land use in the watersheds. As a result, the new modeling findings presented in the draft Update show significant differences in predicted flows and stages for design storms as compared to the 1999 SLCWP model, which is attributed to "the use of a more comprehensive model, updated data, changes in channel, land use, and other information, as well as different assumed antecedent conditions"¹.

¹ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 2, 4-11&12
1450 Merrihue Drive • Naples, Florida 34102 • 239.262.0304 • Fax 239.262.0672 • www.conservancy.org

The Update Study was undertaken to scientifically reevaluate the 1999 plan. The idea that the 1999 SLCWP ("99 Plan") recommended 1055 cfs under I-75 into the Brooks flowway and Halfway Creek is a misconception. A careful review of the actual recommendations of the '99 Plan shows that the projects recommended for Halfway Creek did not include any additional culverts under I-75 or recommend any specific flow at this location. The only references that could be construed as support for the proposed culverts in the '99 Plan was in Phase III-B, which recommended in vague fashion that from "I-75 to the Seminole RR: Channel and structure capacity to be per SFWMD – Brooks Conceptual Permit Approval" as well as a map that was included in Amendment 1 to the '99 Plan that was referred to as "a sketch we were looking at during our conversation," but was not used as the basis for the '99 Plan. The '99 Plan actually states "[f]lows through I-75 to the Estero River South Branch and Halfway Creek combined should be about 2000 cfs with a range from 1215 cfs to 2200 cfs. This flow can be split between the Estero River South Branch and Halfway Creek." It did not specify the proportional split in the plan as to any particular flow to Halfway Creek. Moreover, the '99 Plan also states that the flow capacity under I-75 to the South Branch of the Estero River is 2555 cfs and recommends that more flow be directed to the South Branch (SLCWP, p. III-B. 3-3). Therefore, it is erroneous to state that "A number of 1999 recommendations were not implemented as of 2008, including additional culverts for Halfway Creek under I-75²" and as such, we recommend such references be removed from the final Update Study report.

The Update Study Clearly Demonstrates that Proposed I-75 at Halfway Creek Culverts are not Necessary or Beneficial

As a result of using more current data and sophisticated modeling, the Update Study clearly indicates that the proposed I-75 culverts at Halfway Creek do not reduce flooding in Bonita Springs, nor are they necessary to restore pre-development flows in Halfway Creek or to reduce water levels east of I-75. This is underscored in the current report, where it says that "Reducing the number of culverts from 5 to 1 or 5 to 0 does not significantly decrease the flow under I-75" and "This analysis indicated that the additional culverts are not necessary for conveying the additional flows under I-75, as long as the existing culverts remain free of sediment accumulations."³

The reason that additional culverts would not provide additional flow is that the gradient between water stages east and west of the interstate are not significantly different and therefore do not create the head and velocity to move the water under the interstate. This is evidenced in Table 5-11 where the stage for halfway at I-75 is 16.0 feet in the Base_v2b run compared to 17.2 for the 5 culverts in the simulated 100 year+ storm event. However, after the April 22, 2009 public presentation by the Update modeler, the Update Study was apparently force-fit with a 900 cfs flow under I-75 based on it being recommended in the 1999 study. It appears that to create a stage difference of 1.2 feet, a simulated storm greater than a 100 year storm event in which it rains only on the east side of the interstate in the immediate vicinity of the proposed culverts was used. Thus artificial conditions were used to achieve the stage difference needed to increase the gradient and the resulting velocity of water that would be moved to 900 cfs (coincidentally up 904 cfs -almost exactly the amount proposed in the original 1999 study). This event is not just extremely unlikely but actually impossible as it would require the gates from the Brooks flowway to remain open to the South Branch of the Estero River (which would in fact be closed in such a situation as they operate under a permit condition requiring their closure at the South Branch of Estero River reaching 12').

² South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page ES-1

³ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 5-28

Because the science demonstrates that the culverts at Halfway Creek are unnecessary, expensive I-75 culverts at The Brooks are now being justified to "provide a safety factor" in case maintenance is not done to remove sediment from the existing culverts, to protect against "any unforeseen conditions," to provide capacity in case use of more accurate topography in the model would show higher flows, and to provide "reserve conveyance capacity" in case future downstream improvements allow higher flows⁴. However, none of these reasons are supported with scientific data and the recommendation is contrary to the science compiled as a result of this study. Furthermore, the Update study acknowledges that there could be serious adverse impacts from routing flows that far exceed the historical flows through Halfway Creek. The Update study also says that "Halfway Creek conveyance improvements will consider wetland and scour impacts"⁵ – yet no such analysis accompanies the recommendation for additional flow through Halfway Creek. Therefore, it is premature and inappropriate to recommend additional culverts at Halfway Creek without this further analysis.

Update Study Clearly Shows that the Proposed I-75 Culverts Do Not Reduce Flooding in Bonita Springs

The main purpose of the original 1999 SLCWP was to identify measures to alleviate the potential for the type of flooding in Bonita Springs that occurred in 1995. One of the major recommendations of the 1999 Plan was to pursue restoration of historical flows in major flowways in the watershed, which led to a focus on increasing flows in the South Fork Estero River and Halfway Creek watersheds. The new modeling in the draft Update shows that the proposed I-75 culverts do nothing to reduce flooding in Bonita Springs. Both Alternatives 1 and 2 with up to 5 culverts show at most a 0.04 decrease in stage in the flood prone areas of Bonita Springs.⁶

The only alternative identified to produce a reduction in flood stages in Bonita Springs was Alternative 4, a \$54 million reservoir east of Bonita Springs. The modification to Alternatives 1 and 2, which became the recommended alternative, included a 200 cfs flow to the south at Bonita Beach Road to the Cocohatchee Slough in Collier County that was not studied and again, came simply as a result of a prior recommendation in the original study. Even so, the redirection of 200 cfs of flow south would not result in a reduction in flood stages in Bonita Springs, but could produce a reduction in the duration of flooding by approximately 63 hours. This does not provide the flood risk reduction that the Bonita Springs Community deserves. The Update Study clearly pointed to the only real solution for providing appropriate flood risk reduction for Bonita Springs, which would also protect South Lee's water supply and water quality: additional water retention in the upper Imperial watershed.

Update Study Clearly Shows That The Proposed I-75 Culverts Are Not Necessary or Beneficial to Restore Historical Flows in Halfway Creek

As opposed to the 1999 SLCWP, which had no scientific basis for the flows that were to be provided by the proposed I-75 culverts, the Update Study evaluated and established target flows and found that the use of the existing culverts under I-75 could achieve target flows and levels. The draft Update Study estimated historical (pre-development, pre-I-75) peak flows in Halfway Creek at the I-75 location as 168 cfs.⁷ Furthermore, the current draft report states that "Where possible, peak flows should be limited in each creek to flows that were present during

⁴ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 5-28

⁵ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 4-13

⁶ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 5-12, 13, & 17

⁷ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 1-20 Table 1-6

pre-development conditions...⁸ The existing I-75 culverts at Halfway Creek already provide more flow capacity than what was present in pre-development conditions (approximately 640 cfs). Also, the draft Update model shows that Halfway Creek 100-year storm flows under I-75 with existing culverts are 328 cfs, which is more than the estimated peak historical flow and yet still far less than the current culvert capacity⁹. Therefore, increasing flows to Halfway Creek would not be restorative and even 100-year storm flows could be well accommodated with the existing culvert system in place.

Existing I-75 Culverts Have Already Reduced Water Levels in Wetlands East of I-75

There was, and continues to be, a misperception that I-75 is impeding flows to Halfway Creek and impounding water east of the Interstate on the Edison Farms property. The Edison Farms property is over 80% natural functional wetlands. The Update of the 1999 South Lee County Watershed Plan (SLCWP) and new modeling clearly demonstrates that I-75 is not causing higher than normal water levels in wetlands on the Edison Farms/Agripartners property and is not impeding flow to the Halfway Creek system. Instead, the Update Study has determined that the existing culvert drainage system has reduced normal flooding depths in the some of the wetlands and extensively drained the wetlands east of the Interstate on the Edison Farms property.

The modeling portion of the study determined that "the existing culvert drainage system beneath I-75 has likely caused these reduced normal flooding depth in the west-central portion of the study area." It continues to say "this suggests that the existing drainage ways under I-75 are having a substantial drainage effect on the westerly portion of the study area" (which is the area of wetlands along the westerly border of the Edison Farms site abutting I-75).¹⁰

This was confirmed not only in the modeling, but also in the scientific field observations conducted as a result of this study. The Update Study states "hydroecological field observations suggest that this area currently has an altered hydrologic regime compared to natural, historical conditions" and "the existing drainage system under I-75 in the vicinity of Halfway Creek is the most likely causative factor for these observed indicators of reduced hydrologic regime."¹¹ Furthermore, with regard to the immediate vicinity of the existing Halfway Creek I-75 box culverts that were in the middle of their study area, it states "In the central portion of the study area, WEA's estimated normal SHW elevations are somewhat lower, indicating that field observations are showing more of a drainage effect in this areas than the model results are."¹² Therefore, instead of causing abnormally high water levels in wetlands east of I-75 on the Edison Farms/Agripartners property, the existing culvert system is actually draining the wetlands on that property.

It goes on to warn that "model predictions have not yet been developed for normal SHW levels and hydroperiods after installation of the proposed culvert improvements. To the extent that the additional culverts lower normal SHW elevations, normal flooding depths, and average hydroperiods in those portions of the study area where melaleuca is not dominant, the encroachment of melaleuca will likely be facilitated."¹³ Therefore, it is premature and inappropriate to recommend additional culverts at Halfway Creek without this further analysis.

⁸ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 1-16

⁹ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 5-28,29

¹⁰ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 3-18

¹¹ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 3-8

¹² South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 3-9

¹³ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 3-19

The New Simulated Storm Event is a Force-fit of 900 CFS Flow Under I-75 In An Attempt to Justify the Proposed I-75 Culverts at Halfway Creek

A new simulated storm was introduced in this final draft that was not previously considered. As described on Update pp. 5-33&34, an analysis was performed using the 900 cfs through Halfway Creek because it was recommended by the 1999 SLCWP Amendment 1, which showed 1055 cfs but 160 cfs has been removed as it was not provided for in the construction of The Brooks. Using a simulated storm where it rains at such intensity only east of the interstate, an artificial gradient between the water levels east and west of the Interstate is created such as to provide the velocity of approximately 900 cfs. This is demonstrated in Table 5-11, which shows results from a simulated storm that somehow created a stage in the wetlands east of I-75 of 17.2 feet to create a flow of 904 cfs with "localized heavy precipitation" that could "generate flood elevations east of I-75 higher than the 100-year predicted elevations." This was done to demonstrate that flooding would not occur downstream between I-75 and Highway 41, but it assumed that the Brooks By-pass gate would be open.¹⁴

Even with this unrealistic assumption of very localized flooding, it was telling that "flow and stages are essentially the same if the number of culverts is dropped from 5 to 2"¹⁵. The report does not tell us what the results are between 5 and 0, though we would suspect they would be similar - as the result of the increased velocity is from the increased gradient from rain only occurring east of the interstate at enormous rates and from the false assumption that the Brooks By-pass gate would remain open downstream. This appears to be reverse to force-fit 900 cfs and make whatever changes are necessary to the rest of the model to facilitate that result. To do so would fly in the face of the purpose of this study, which was to determine the appropriate flow rate under I-75 at Halfway Creek and whether the existing culverts could accommodate this rate or whether additional ones were necessary. Therefore, much more detailed information should be produced to explain this simulated storm, which is far higher than a 100-year storm event.

The Need for the Proposed I-75 Culverts At Halfway Creek, Refuted by the Modeling, are Not Justified By Speculative Benefits

Again, the statement on Update p. 5-28 totally refutes the need for culverts under I-75: "Reducing the number of culverts from 5 to 1 or 5 to 0 does not significantly decrease the flow under I-75, as long as the existing 9 x 8 culverts remain free of sediment accumulation." Despite this clear statement, the draft report goes on to discuss the benefits of culverts without providing any modeling data to support these benefits. The first supposed benefit is to "provide a safety factor to protect against maintenance issues and any unforeseen conditions." Cleaning out the existing culverts on a routine basis would take care of any safety factor. The second supposed benefit is to "provide capacity to account for potential additional flows resulting from using more accurate topography which is now available." Instead of guessing and building culverts that are probably not necessary, the more accurate topography should be used in the modeling now. The third supposed benefit is to "provide reserve conveyance capacity." Again, there is no basis for spending money on the culverts, which would provide a speculative benefit for an undetermined and unidentified need – especially when there are serious outstanding needs for additional water retention in the upper Imperial River watershed to provide flood risk reduction for Bonita Springs. Additionally, in the final recommendations of the Update, an added benefit is alluded to – protection of I-75 from flooding. Since all of I-75 is designed to a 100-year storm event, it is obviously illogical to upsize just the culverts at Halfway Creek to a 500 or 1,000 year

¹⁴ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 5-33&34

¹⁵ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 5-33

event in order to alleviate the potential flooding of I-75 in a catastrophic event - as there would obviously be failures at all the other areas I-75 crosses waterbodies in such a rare situation.

The Draft Update Study and Recent Request to FDOT to Submit a Permit Modification for the Installation of the Proposed Culverts at Halfway Creek Violate the Requirements of the FDOT ERP

The FDOT ERP Amendment from February 2008, dealing with the I-75 culverts contains the following requirements for the SLCWP Update:

- "1. In accordance with the terms herein, a flood study (the study) shall be undertaken by the South Florida Water Management District (District) and Lee County (the County) to verify and validate the findings and material assumptions of the South Lee County Watershed Plan (July 1999) (SLCWP), as specified below. Among other components, which may be agreed upon by the district and county, the study shall, at a minimum, address and include:
- (A) The required flow and conveyance capacity to restore flows to Halfway Creek, the South Branch of Estero River and Spring Creek.
 - (B) Identification of downstream impediments to required flow.
 - (C) The model established under Phase I; Hydrologic - Hydraulic Model Development shall be reviewed for its accuracy to determine flow rates for (a) above based on changes to land uses and incorporation or implementation of any of the SLCWP elements since its completion. This shall also include validation of the computer models utilized in the SLCWP that would have any impact on (a) above.
 - (D) Phase II: Ecological Assessment shall be reviewed for its accuracy and relevance to current ecological goals, objectives and problems as identified in the latest Southwest Florida Feasibility Study draft work products.
 - (E) Phase III: Problem Identification & Plan Formulation shall be reviewed and updated to reflect work completed to date and any changes resulting from the review of Phase I and II above.
 - (F) Amendment No. 1 of the SLCWP shall be updated based on above findings including, but not limited to verification of or recommended changes to flow distributions to receiving water bodies.
 - (G) Verification of upstream/inflow (1055 cfs which was permitted by the SFWMD for The Brooks project) and downstream conveyance capacity."

Although Paragraph F of the FDOT ERP Amendment states that the SLCWP shall be updated based on the findings of the study, the opposite has happened. The study has been altered to fulfill flows based on the 1999 SLCWP.

Additionally, we have been assured repeatedly by SFWMD staff that the SFWMD would not pursue the installation of any culverts prior to the completion and acceptance of the final report – even despite the delay in the completion of the study. The SFWMD did not start this study for months and publicly stated at each stakeholder meeting that despite the late start, the final report would be available prior to May 14th. Even up to a week before the deadline, stakeholders were assured that the final draft report would be available before the deadline, with the deadline extended to allow for public review and input.

The I-75 Widening Segment B permit language in Paragraphs 5 and 7 states:

- "5. The Study shall be concluded in 15 months or less, and accepted by the District and the County within such timeframe in order to remain consistent with FDOT's

1-75 construction timetable and will avoid any construction delays. Completion of the Study within 15 months or less shall insure that the Study will be utilized as a basis for determining the number, control, and invert elevation of the culverts before their installation is necessitated by the FDOT's design/ build contract. Should the Study not be completed within the 15 month timetable the 5 - 60" RCP culverts will be constructed prior to the completion of the 36 month construction timetable and will not be operational until authorized by the District Governing Board approving a modification to this permit.

7. Once the proper sizing, location, elevations (both the invert and control) of the culverts, based upon the Study, are determined, the FDOT is hereby authorized to construct the 5 - 60" RCP culverts, *or the number and design of the culverts as determined by the Study* (emphasis added). However, this permit shall only constitute authorization to operate 3 of the 5 - 60" RCP culverts in an amount not to exceed 225 cubic feet per second if the Study validates and justifies the need to operate same. Should the Study validate and justify the need to construct and operate any additional culverts, then the FDOT shall apply to the District for a permit modification to be authorized by the Governing Board. In no event shall any culverts be constructed or operated prior to the completion and acceptance of the Study within the 15 month time period."

Therefore, the permit does not authorize the installation of any culverts unless the study says so. If the study was not completed in time (in which case, as explained, the SFWMD had verbally assured us that the deadline would be extended), the SFWMD authorized 5 culverts to be constructed but only authorized 3 to be operated. Therefore, the statement in the Update Study which says that "the permit conditions for the expansion of I-75 stipulate that of the five culverts, only three culverts are authorized that increase flows by 225 cfs. An additional two culverts could only be installed if this study indicates the need for those two additional culverts" is incorrect and should be removed from the draft before the report is finalized.

Moreover, FDOT has already been told to install the culverts, although FDOT has informed the SFWMD that this will require trenches that would have to be excavated (instead of jack and bore), potentially delaying completion of I-75 widening. This violates the agreement between all parties that the science and final report would dictate whether additional culverts were justified, necessary and should be installed.

The Study does not Adequately Evaluate Restoring Flows to the South Branch of the Estero River Directly.

It is acknowledged throughout the report that the South Branch of the Estero River, the Estero Bay tributary, needs restoration of additional flows. The Update Study determined that the estimated historical peak flows to the South Branch of the Estero River were approximately 1,613 cfs.¹⁶ It also determined that the simulated flows for the South Branch of the Estero River under current conditions are 58 cfs (5-year) to 130 cfs (100-year).¹⁷ As a result, the Update Study concludes that "there is less flow for the South Branch of the Estero River" "likely the result of constrictions in the channel downstream of I-75", such as "fill in the floodplain associated with a parking lot of recreational vehicles of residents in Corkscrew Woodlands." However, the report does not properly evaluate this as an alternative, acknowledging that "Impacts to the Corkscrew Woodlands neighborhood (just west of I-75 and adjacent to the South Branch) will have to be evaluated carefully for alternatives involving re-direction of flows

¹⁶ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 1-20

¹⁷ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 4-11

to the South Branch of the Estero River.”¹⁸ Restoring flows to the appropriate creek system should be paramount, with the necessary modeling and analysis to determine the feasibility and cost of doing so. Therefore, rather than recommending the redirection of the flows from the South Branch of the Estero to Halfway Creek, there should be further analysis as to whether it would be feasible to restore those flows directly to the South Branch of the Estero where they belong.

The Update Study Does Support and Acknowledge the Need for Additional Culverts under I-75 at the juncture with Spring Creek

The Update Study determined that the estimated peak flow to Spring Creek at US 41 was 336 cfs.¹⁹ It did not specify peak flow to Spring Creek at I-75. It states that the measure flow in Spring Creek at US41 in the 1995 storm was 44 (s. branch) and 4 (n. branch) with 2009 conditions producing 20 (s. branch) and 15 (n. branch). Therefore, though more analysis would be necessary for refinement and to determine the appropriate amount to be conveyed to Spring Creek under I-75 – it is evident that additional flows would be restorative and are justified. Thus, we would support the idea that once further modeling is done to determine the amount of additional flows necessary to restore Spring Creek to historical levels, then the installation of those culverts should be pursued. These culverts should be blocked until all necessary downstream improvements are made to ensure their safe operation and a weir could be placed upstream to ensure they do not adversely impact the hydrology of upstream wetlands.

The Conservancy of Southwest Florida's Recommendations for Finalizing the Update Study Report

- 1) The SFWMD should not pursue or continue to request FDOT to install the I-75 culverts at Halfway Creek as they are unnecessary, wasteful, and potentially harmful to both upstream and downstream wetland and water resources. As demonstrated by the Update, the proposed I-75 culverts do not produce any reduction in flooding in Bonita Springs and are unnecessary to restore historical flows to Halfway Creek. In addition to the cost to FDOT (and taxpayers), the current recommended alternative would cost about \$10.3 million without the expense of the culverts themselves (\$8-10 million estimated) - providing no substantiated benefit and creating further potential harm to up and downstream wetland and water resources.
- 2) Remove inaccurate statements from Update Study, including references that the 1999 SLCWP recommended proposed culverts under I-75 at Halfway Creek and that the permit allows construction of proposed culverts not at the number and design supported by the complete and accepted final study report.
- 3) Remove recommendation of additional 200 cfs flows south to the Cocohatchee Slough until similar analysis and modeling is done with regard to the impacts to Cocohatchee wetland target stages and Cocohatchee River target flows to ensure that the additional flows would be consistent with the historical flow regimes of the system and would not diminish the hydrology of the wetlands within the Cocohatchee Slough.
- 4) Conduct further analysis of how to implement direct restoration of additional flows to the South Branch of the Estero River.
- 5) Retain recommendation for additional culverts into Spring Creek consistent with the target flows for Spring Creek in the Update Study (in lieu of original proposed I-75 culvert that was never installed when I-75 was constructed and blocked until downstream improvements are completed in order to ensure their safe operation).

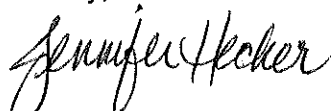
¹⁸ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 4-13

¹⁹ South Lee County Watershed Plan Update Final Report – May 14, 2009 DRAFT. Page 1-20

- 6) Analyze potential installation of weirs or other water control structures around existing I-75 culverts to address the existing drainage impacts of their operation on the wetlands east of I-75 in the Edison Farms property while maintaining base flows necessary to support downstream wetland systems.

We respectfully request that the South Florida Water Management District discontinue requesting a permit modification to require FDOT to install the I-75 culverts at Halfway Creek as they have been demonstrated to be unnecessary, wasteful, and potentially harmful to both upstream and downstream areas. We would also request that the SFWMD staff and governing board ensure that this report is revised with recommendations based on science. Doing so will provide confidence to community stakeholders that infrastructure investments are being placed where they will provide the greatest regional benefit, and in such a way as to protect our exceptional natural resources, which are the foundation of our sustainability and quality of life as Southwest Floridians. Thank you for your time and consideration of our comments.

Sincerely,



Jennifer Hecker
Natural Resource Policy Manager

- cc: Carol Wehle, SFWMD
Chip Merriam, SFWMD
Ricardo Valero, SFWMD
SFWMD Governing Board Members
Secretary Kopelousos, FDOT
Stan Cann, FDOT
Johnny Limbaugh, FDOT
Lee County Commissioners
Wayne Daltry, Lee County
Roland Ottolini, Lee County
Bonita Springs City Council