

**John E Wells, Jr**  
201 Front Street, Suite 202  
Key West, FL 33040

305-294-3288

Dear Mayor and City Commissioners;

At tomorrow's Commission meeting, you will discuss Item 32 pertaining to the Scope of Work setting parameters for Stantec Consulting in their water quality monitoring program. Please consider the following points pertaining to this issue:

1. The Scope of Work refers to monitoring turbidity in KW Harbor in conjunction with Chapter 80 of the City of Key West Code of Ordinances. Specifically, Exhibit A, para. 1.3, lists turbidity as a "pollutant." In addition, para. 3.2 implies turbidity is a pollutant. It is not.

Unless there has been a recent amendment to Chapter 80, turbidity is not listed as a pollutant in that document. It appears Exhibit A supersedes the Code of Ordinances. Is this Exhibit A intending to quietly alter Chapter 80?

2. Paragraph 3.4 discusses Cruise ship Discharge Compliance Strategy. Once again, the City appears to be trying to step into an area that is already well covered by Federal and State agencies. The City is neither qualified, experienced nor needed to address ship discharges.
3. It is well-known that the United States Coast Guard is the primary and overriding agency tasked with vessel discharge events. They are eminently experienced, funded, and equipped to detect, evaluate, mitigate and prosecute any vessel discharges, either intentional or accidental. There has never been a discharge of pollutants by any cruise ship in Key West waters.
4. The very first paragraph in the Scope of Work calls for the monitoring to "mirror prior data collection methodologies." If the City is intent on chasing the transient turbidity issue in Key West Harbor, it is incumbent on the Contractor to avoid the grievous methodology error of the prior Contractor, the College of the Florida Keys. Their placement of sampling devices on the "yellow man" bollard dolphin resulted in skewed and biased data as the sampling point is only 25-30 meters from a ship's bow thrusters. They weren't trying to monitor turbidity in the harbor – they were trying to libel cruise ships. The Contractor should devise better sampling strategies, including those to sample turbidity from natural high wind events.

KW Commission

1-5-26

p. 2

Mayor and Commissioners, I submit that the Scope of Work is a flawed document regarding issues directed at cruise ships. Isn't it past time for the Commission to move beyond "virtue signaling" to cruise ship opponents. They have already cost the City a great deal. As Dr. Crosby at Mote Marine said to you: cruiseships are not the problem.

Sincerely,

*John E Wells, Jr*

Ships' Agent (ret.)