



August 10, 2021

Colonel Andrew Kelly
Jacksonville District Commander
U.S. Army Corps of Engineers
701 San Marco Boulevard
Jacksonville, Florida 32207

Letter submitted electronically via Kelly, Andrew D (Drew) COL USARMY CESAJ (USA)
Andrew.D.Kelly@usace.army.mil

Re: LOSOM

Colonel Kelly,

Lee County closely followed the Army Corp's Web Meeting held on August 9th and continue to be frustrated with the direction of the "preferred alternative" and optimization process. Lee County remains profoundly disappointed with the starting point for optimization, and we continue to be concerned about how "optimization" will occur over the next two months.

While we appreciate your commitment to cap flows to the Caloosahatchee (CRE) in Zone D to 2,100 cfs in both wet and dry conditions, we are concerned and disappointed in your sequence to alleviate the increase in damaging discharges that results from your preferred alternative. Creating further harmful impacts to Lake Okeechobee is not acceptable. If the end result is a Lake Okeechobee that no longer has a healthy marsh system simply to maintain drastic benefits to the St. Lucie, the CRE will again suffer due to poor water quality in Lake Okeechobee. Further, driving the Lake lower as we are heading toward drought will only hasten water shortage and cut off flows entirely to the CRE when conditions are dry. We must reiterate our position that the CRE must not become the only outlet for flood control releases from Lake Okeechobee. Doing so, will continue to cause harm regardless of the cap to flows at S-79.

We continue to be dismayed that the Corps is still not using S-79 as in the Decision Tree, Part D in wet conditions. We are unclear as to how, if you continue to use S-77 in Part D, you can ensure that flows will be capped to 2,100 cfs when hydrologic conditions are wet. Oscillating between measuring at S-79 and S-77 will continue to place the CRE at risk for continued damaging discharges, especially if it remains the only outlet in wet conditions in Zone D.

Finally, we remain concerned about the total volume of water from the Lake to our estuary. Your misstatement in the meeting that under Alternative CC, the increase in total volume was a result of beneficial flows to the Caloosahatchee amplified this concern. As we have previously made clear, any increase in total volume of discharge results in increased nutrient loading to the CRE. As you are aware, there is a Total Nitrogen TMDL for the CRE in which stakeholders have dedicated significant financial contributions towards water quality projects, land acquisition, and programs to reduce pollutant loading. The total volume increases in Alternative CC did not come about because of beneficial flows nor is it the case that increasing beneficial flows necessarily increases the total volume.

The data shows that the overall increase in volume in Alternative CC was a result of damaging discharges, not the marginal increase in optimal flows. To avoid these misstatements in the future, it is essential that the Corps evaluate total volumes of flow in each flow range and incorporate more useful metrics of performance such as daily flows or mean monthly flows rather than the 14-day moving averages. By utilizing more transparent metrics we can all be clear on what the impacts, positive or negative, actually are to the Caloosahatchee.

Continuing down the path that you articulated has done little to alleviate our concerns. We continue to be frustrated by the process and the outcome. We sincerely hope that appropriate changes are made to achieve balance in Lake Operations.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Ruane". The signature is fluid and cursive, with a large initial "K" and "R".

Kevin Ruane, Chairman