



March 19, 2021

Colonel Andrew Kelly, District Commander  
United States Army Corp of Engineers, Jacksonville District  
701 Marco Boulevard  
Jacksonville, Florida 32207

Re: LOSOM

The Honorable Colonel Kelly,

On behalf of the Lee County Commission and the Cities of Cape Coral, Estero, Fort Myers, Fort Myers Beach, Sanibel and Bonita Springs (pending approval by the City Council at their meeting March 24, 2021), we are writing to express our concerns about the current level of Lake Okeechobee as we approach the rainy season and to provide our thoughts on the Lake Okeechobee System Update Manual (LOSOM) that the US Army Corps of Engineers (Corps) is undertaking. We thank you for the work that you and your staff are putting into both managing Lake Okeechobee levels and developing LOSOM and we appreciate the opportunity to provide input on these processes.

We are very concerned about the current level of Lake Okeechobee. At present, the lake sits at just under 15 feet. This is more than 2.6 feet higher than it was at this time during the past two years. This is very concerning given the impacts that our communities experienced in 2018 as a result of damaging discharges from the lake and the harmful algal blooms that impacted the Caloosahatchee River and estuary, our canals and inland waterways, and coastal waters. Our communities in Lee County reported nearly \$300m of economic impact in lost revenue as a result of the harmful algal blooms in 2018. Our local businesses are just now beginning to recover from the impacts of the COVID-19 pandemic and we see light at the end of the tunnel. We cannot afford to compound the impacts to our communities with high-volume discharges from the lake. We strongly urge the Corps to evaluate all options for moving water out of the lake, to the south, east, and west, and better balance the various project purposes of the Central and Southern Florida Project.

The development of LOSOM and a new regulation schedule is a critical step to improve ecological conditions for Lake Okeechobee, the Caloosahatchee Estuary and the St. Lucie Estuary while ensuring adequate water supply for those users dependent upon the Lake. This interim schedule will be the bridge to greater ecological improvements that will be achieved through completion of the Comprehensive Everglades Restoration Plan (CERP). While interim, the new schedule should be a marked improvement taking into consideration the restoration of the Kissimmee River, the rehabilitation of the Herbert Hoover Dike, and the planned completion and operation of the C-43 West Basin Reservoir and the C-44 Reservoir and Stormwater Treatment Area.

As the Corps has progressed through the LOSOM process various computer models have been used to evaluate scenarios for operating the system in a manner that would be best for any one user group. Examination of the results of these modeling “runs” continues to indicate that developing a schedule to the sole benefit of a particular user group would have detrimental impacts on other users. Now, more than ever, it is imperative that the Corps design models and plans that will work to benefit all stakeholders as much as possible.

The restoration of the Caloosahatchee depends on limiting the frequency of damaging high flows while providing necessary low flows. Currently, the Caloosahatchee Estuary suffers from both excessive high flows during the rainy season and inadequate flow during the dry season, with both situations leading to an increased frequency of a salinity imbalance in the estuary and Harmful Algal Blooms. These conditions take an extreme toll on our natural systems and an immeasurable hit to our economy that is based on the health of our unique ecosystems. Based on current lake levels, there is a good chance that the Caloosahatchee will again be impacted by high-volume releases from the lake this rainy season.

We fully understand that the limitations of the current system do not allow for any one stakeholder to realistically achieve even near-perfect conditions through development of LOSOM. What we do ask and expect out of the process is that the Corps recognizes that while the Caloosahatchee and the residents of Lee County realize minimal benefits from the Central and Southern Florida Flood Control project we should not continue to suffer the bulk of the adversity. **LOSOM should therefore improve conditions in the Caloosahatchee Estuary beyond those expected from the C-43 Reservoir.**

We will continue to provide input to the Corps as we carry on with the LOSOM process. From the beginning, our charge has been to look for ways and means that will provide for balanced solutions for all stakeholders. We will continue to work with you towards that goal. All of us, as stewards of the resource, should do no less.

Thank you for considering our comments and we look forward to working with you and the Army Corps of Engineers to find a path forward that is equitable for all stakeholders impacted by Lake Okeechobee operations. While the work may not be easy, the potential for lasting benefit to Florida’s ecosystems and millions of Floridians is well worth the effort.

Sincerely,



Kevin Ruane, Chairman  
Lee County Commissioners



John Gunter, Mayor  
City of Cape Coral



Katy Errington, Mayor  
Village of Estero



Kevin Anderson, Mayor  
City of Fort Myers



Ray Murphy, Mayor  
Town of Fort Myers Beach



Holly Smith, Mayor  
City of Sanibel