



July 7, 2021

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

Colonel Kelly,

On behalf of Lee County, the City of Sanibel and the City of Cape Coral, who have been working together over the last year through the Lake Okeechobee System Operations Manual (LOSOM) process, we are writing this letter to provide comment on the Iteration 2 plans. We are thankful for the work that your staff has done to this point and the direction this is moving in. To be clear, LOSOM is of major importance to us in Lee County as it is the most significant water quality improvement we can see happen over the next few years, with the exception of the C-43 Reservoir and EAA Reservoir. Unlike these Reservoirs however, LOSOM has the potential to have immediate positive impact on our environment. If we get this wrong, the ecological effects on the Caloosahatchee could forever alter our system.

Unity with the east coast previously expressed by many stakeholders for Plan CC was predicated on the proposed modification to cap flows at S79. While Plan CC may have been a starting point for discussion, changes would be essential before we could be supportive. As currently written, there are only marginal benefits in the number of the highest volume discharges and yet there is a significant increase in overall flood control discharges to the Caloosahatchee. In fact, Plan CC in its current form puts a larger overall burden of flood control releases on the Caloosahatchee Estuary, more so than any other plan alternative. According to our analysis, the number of days where flow will be in the harmful 2,600 to 4,500 cfs range will jump by 40%. Proposed modifications to send more water south that have been presented to us do little to nothing to alleviate this problem. Looking at the data these flows would lead to multiple successive years where we have harmful discharges for 50% of the time. This type of management would simply be devastating for our ecology. Plan CC, if chosen, must address these imbalances.

Plan CC must be modified to limit discharges in Zone D to 2,100 cfs at S-79, in accordance with the 2020 RECOVER optimal flow range. As stated in prior correspondence, the Caloosahatchee should not shoulder a larger burden of flood control releases than it does under LORS 08. According to our

modeling and all of the modeling we have seen to date there is no way to achieve this unless both estuaries receive some amount of flow in Zone D rather all of the flow going to the Caloosahatchee. Under that scenario, we could be supportive of Plan CC. Doing this would also more equally distribute the benefits of flow that would be sent south of the Lake.

Plan EE1 has some very positive aspects, and we appreciate the Corp's effort here in thinking outside the box to shift toward a "target Lake stage approach" with the flexibility to make changes based on climate conditions. Not only does it have an overall better balance of flood control releases to the Caloosahatchee Estuary, but the highest volume discharges drop by 50%. We are highly supportive of this. Unfortunately, the flows, less than 457 cfs increase slightly under Plan EE1. Periods of prolonged low flow are often the most difficult for our fisheries to recover from. If Plan EE1 is chosen, the negative impact on flows <457 cfs must decrease.

After the PDT Meeting on June 30th, we took a deeper look at Plan BB and acknowledge its benefits for the Caloosahatchee, especially in the 2,100-6,500 cfs range and the optimal flow range. As we move into Iteration 3 and the optimization of the chosen Lake regulation schedule, whichever plan is chosen we must alleviate the shortcomings mentioned above and flows to the Caloosahatchee must be measured at S-79 rather than S-77. Our ecological performance is measured at S-79 and it is simply more transparent to our residents in understanding the impact of decision making and the proposed Lake schedules.

Plans BB, EE1 and possibly CC could all have positive benefits to the Caloosahatchee Estuary but still need substantial optimization to provide more balance and eliminate the negative impacts that are currently present. It is important to note that these negative impacts will be exacerbated in the three years prior to completion of the C-43 Reservoir and therefore cannot go unaddressed. We appreciate the work you have done to date and look forward to seeing further improvement as this process moves forward.

Sincerely,



Kevin Ruane, Chairman  
Lee County Board of County Commissioners



John Gunter, Mayor  
City of Cape Coral



Holly Smith, Mayor  
City of Sanibel

Cc: Drew Bartlett, SFWMD Executive Director  
SFWMD Governing Board