



## City of Sanibel

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March 18, 2021

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

Re: Balance in LOSOM

Dear Colonel Kelly:

On behalf of the Sanibel City Council, thank you for the opportunity to participate in the Corps' critically important effort to develop a new Lake Okeechobee System Operating Manual (LOSOM). While we recognize that CERP is ultimately the tool for achieving balance in the system, in the interim, LOSOM offers a rare opportunity for the Corps to engage with stakeholders to improve the current operations of Lake Okeechobee and maximize the benefits achieved by new infrastructure soon to be operational, including the rehabilitation of the Herbert Hoover Dike, the Kissimmee River Restoration Project, the C-43 West Basin Storage Reservoir (WBSR), and the C-44 Reservoir and Stormwater Treatment Area.

It is apparent through thorough evaluation of the initial array (i.e., those plans that provide maximum benefit to one part of the system) that operating the Lake Okeechobee system for any single interest has a negative effect on another. For the Caloosahatchee generally, runs most beneficial to other resource areas are either too wet or too dry for the Caloosahatchee, resulting in an unacceptable number of high flow (>6500 cfs) events (e.g., St. Lucie Estuary ecology plans, Lake Okeechobee ecology plans) or an unacceptable number of low flow (<457 cfs) events (e.g., water supply plans, navigation plans).

While reducing the frequency of damaging high and low flows is the overarching restoration goal for the Caloosahatchee Estuary, we recognize that achieving perfect conditions for the Caloosahatchee to the detriment of other parts of the system is an unrealistic expectation and the opposite of a balanced approach. However, we also urge the Corps to ensure that the Caloosahatchee no longer bears an unfair share of the burden for a flood control system that was not intended to benefit Lee County, but that has at times been devastating to the health of our estuary, our economy, and our way of life.

As the Corps has already begun engaging stakeholders to consider the key components of a balanced plan, we appreciate this opportunity to provide input on what we find to be the critical aspects of a balanced plan for the Caloosahatchee. Compared to the present condition under LORS2008, LOSOM offers the opportunity to achieve progress in reducing both high and low flows to the Caloosahatchee. We expect LOSOM to preserve and improve upon the benefits of the C-43 WBSR that are achieved even with no change to the operation schedule (i.e., future without-FWO). While the major benefit of the C-43 WBSR will be to reduce low flow conditions during the dry season, it is also anticipated to achieve reductions (~10%) in high flow conditions during the rainy season. Additional improvements to high flow conditions due to the diversion of regulatory Lake discharges to other areas of the system are also evident in the future without condition. LOSOM must build upon these improvements. If the adopted plan fails to perform as well or better than the FWO, the Caloosahatchee is likely to experience more harmful conditions than it does under the current regulation schedule, particularly for the period between the implementation of LOSOM (2022) and operation of the C-43 WBSR (2025).

Thank you for considering our comments. We highly value the opportunity to participate in the LOSOM process and seek to balance all the project purposes equally. We look forward to continuing to work with you and the Army Corps of Engineers, and the other stakeholders to formulate a balanced plan that achieves desired improvements across all objectives.

Respectfully,



Holly D. Smith  
Mayor, City of Sanibel

Cc: Sanibel City Council  
Judith Zimomra, City Manager  
John Agnew, City Attorney  
Scotty Lynn Kelly, City Clerk