



City of Sanibel

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August 9, 2021

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

Letter submitted electronically via: ANDREW.D.KELLY@USACE.ARMY.MIL

Re: LOSOM Preferred Alternative Optimization Plan

Colonel Kelly:

On behalf of the City of Sanibel and the Sanibel City Council, I thank you for your continued work on LOSOM and for your time spent meeting with stakeholders during your recent roadshow. It is not surprising to us that you heard broad support for addressing the stressful and damaging flows to the Caloosahatchee that would occur under Alternative CC. It is clear to most that an alternative that delivers more stressful and damaging discharges to the Caloosahatchee than LORS08 is far from equitable. The Caloosahatchee has borne the brunt of Lake Okeechobee discharges for far too long.

We applaud the Corps' stated goal to reduce stress to the Caloosahatchee River and Estuary and agree that the first step in achieving this goal is to limit regulatory releases in Zone D to 2,100 cfs at S-79. However, increasing regulatory releases to the St. Lucie Estuary only as a "last resort" is a clear statement by the Corps that you will continue to prioritize protection of the St. Lucie Estuary at the expense of the Caloosahatchee and Lake Okeechobee. With releases to the St. Lucie Estuary essentially off the table, the Corps' only remaining tool is to increase the interim storage of the lake. While the Herbert Hoover Dike Rehabilitation affords this opportunity, higher lake stages are in direct conflict with the goal of helping Lake ecology by addressing the duration and number of events above 17 feet. Higher lake stages also eliminate the Lake's marsh areas that provide wildlife habitat and perform critical nutrient uptake. Failure to include equitable releases to both estuaries in the Iteration 3 modeling is unacceptable and irresponsible.

In addition to the qualitative goals that were laid out today, it is critical that the Corps identify quantitative goals as well. As the west coast stakeholders have stated repeatedly, the adopted LOSOM must perform better than LORS08. Simply improving upon Alternative CC is not enough. To us, addressing the stressful and damaging flows to the Caloosahatchee means that when optimization is complete, what was once "Alternative CC" performs BETTER than LORS08 across all the performance metrics.

We remain extremely concerned that even after optimization the Caloosahatchee will still receive a greater total volume of water than we do currently under LORS08 and the greatest volume of regulatory discharges overall. This is clearly not an improvement for the Caloosahatchee. We are also frustrated that the Corps continues to suggest that this is due to more flows in the beneficial low and optimum ranges when Dr. Peter Doering's analysis clearly shows that this is not the case at all. Total flow volume in the harmful 2,600 to 4,500 cfs range increases by 37%; the number of months in which the mean monthly flow is in the stressful or damaging range increases by 25%. This will continue to have devastating impacts to our ecology and economy.

Finally, your commitment to communicate the Corps' release decisions based on flows at S-79 is much appreciated. However, I must state I found this to be vague. From the onset of the LOSOM process, the City of Sanibel has requested and stated the importance that ALL FLOWS to the Caloosahatchee be measured at S-79. It is critical that in addition to simply communicating flows at S-79, this change must be fully incorporated into LOSOM so that watershed runoff is accounted for when release decisions are made. As we have stated throughout this process, this is key to ensuring transparency to the public and that there is consistency and equity between flow measurements to the east and west coast estuaries.

Again, thank for your leadership through this challenging process and consideration of our input. The City of Sanibel remains committed to supporting a LOSOM plan which truly provides substantive performance improvements to the Caloosahatchee Estuary.

We are staying engaged and staying tuned.

Respectfully,


Holly D. Smith
Mayor, City of Sanibel

Cc: Eva Velez, Strategic Program Manager, U.S. Army Corps of Engineers
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Sanibel City Council
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John Agnew, City Attorney
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Holly Milbrandt, Natural Resources Director