



## City of Sanibel

800 Dunlop Road  
Sanibel, Florida 33957-4096

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May 12, 2021

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

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 balanced Lake Okeechobee System Operating Manual (LOSOM). We are extremely concerned and disappointed that after investing nearly two years in the process and providing detailed technical input and recommendations, four of the "balanced frameworks" presented to the PDT on May 7, 2021 are not balanced at all. These frameworks will have significant negative impacts on the Caloosahatchee and offer little hope that that Caloosahatchee will fare any better under LOSOM than it does currently under LORS08. This is unacceptable.

While we understand the Corps' intent over the next three weeks is to use the available modeling to make needed improvements to the "balanced frameworks," it is difficult to understand how this can be achieved given that the starting point is so highly unbalanced. We are discouraged by the lack of transparency by the Corps in how these "balanced frameworks" were developed and selected to move forward. We respectfully request the Corps be transparent as to why these framework alternatives were selected over alternatives with more demonstrated benefit to all stakeholders and why no framework was selected to reflect the west coast stakeholders' perspective of balance.

Additionally, as we have repeatedly stated, under any new lake operation schedule, flows to the Caloosahatchee must be measured at S-79 (Franklin Lock), not S-77 (Moore Haven). We believe this does not in any way tie the Corps' hands when it comes to making Lake Okeechobee regulatory releases, but it is critical to protecting the health of the Caloosahatchee, provides consistency in the measurement of discharges made to both estuaries, and it ensures transparency for the citizens of Sanibel and SWFL.

It is also imperative that the PDT and all stakeholders have sufficient time to review and understand the Iteration 2 modeling results, prior to selection of the final plan. If this cannot be achieved given the current timeline, the Corps must be willing to alter the timeline to allow for a thorough and complete review.

From the beginning, we have recognized 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, the Caloosahatchee cannot continue to bear an unfair share of the burden and harm for a flood control system that was not intended to benefit Lee County, and that has at times been devastating to the health of our estuary, our economy, and our way of life. Today, the elevation of Lake Okeechobee is higher than it was at this time in 2018; an algae bloom is present covering more than 500 square miles. While LOSOM cannot change conditions in the short-term, it is the tool for improving conditions in the Caloosahatchee and throughout the system for the next ten years. We look forward to the selection of a LOSOM plan that will provide truly balanced solutions for all stakeholders.

Respectfully,



Holly D. Smith  
Mayor, City of Sanibel

Cc: Representative Byron Donalds, District 19  
Representative Greg Stube, District 17  
Governor Ron DeSantis  
Chairman Chauncey Goss, South Florida Water Management District  
Executive Director Drew Bartlett, South Florida Water Management District  
Chairman Kevin Ruane, Lee County Board of County Commissioners  
Sanibel City Council