

COMMITTEE OF THE ISLANDS
P.O. BOX 88
SANIBEL, FLORIDA 33957

July 29, 2021

Colonel Andrew D. Kelly
The U.S Army Corps of Engineers, Jacksonville District

Re: Modifications needed to Alternative CC to LOSOM

Dear Colonel Kelly:

These comments are submitted in behalf of Committee of the Islands (COTI), a Florida not-for-profit corporation based in Sanibel. Since its founding in 1975 COTI has had as its mission protection of the environment on our barrier island community and surrounding marine resources including the Caloosahatchee estuary.

We understand Alternative CC has been selected as the next step in developing the Lake Okeechobee System Operating Manual (LOSOM). We are concerned that as currently drafted Alternative CC would continue a pattern of excessive harm to the Caloosahatchee:

- The Caloosahatchee will continue to be the primary outlet for Lake Okeechobee.
- Total volume of water delivered to the Caloosahatchee will increase, providing unwanted nutrients for harmful algal blooms.
- It would increase the frequency and duration of harmful flow events to the Caloosahatchee, thereby impacting salinity and harming species that are sensitive to salinity fluctuations.
- Flows continue to be measured at the Lake instead of the estuary during wet conditions.

The point at which flows are measured is critical if fairness is to be achieved. All flows to the Caloosahatchee should be measured at the Franklin Lock (S-79) so that watershed runoff is factored in when decisions are made on how much water is released to the Caloosahatchee at the estuary. Flows to the St Lucie are currently measured at S-80, the estuary. Similar treatment must be accorded the Caloosahatchee if balance is to be achieved.

We ask you to incorporate the following changes to Alternative

CC in the interests of fairness and transparency: - Measure all discharges to the Caloosahatchee at the Franklin Lock (S-79).
- Cap discharges made in Zone D to a maximum of 2,100 cfs at S-79.
- Distribute flows across all outlets during rainy season.
- Provide for beneficial dry season releases to the Caloosahatchee and the Everglades.
- Minimize or eliminate the back flow of nutrient rich water from the EAA to the Lake.

If LOSOM is to be transparent and balanced toward all stakeholders, shared adversity must be woven into all aspects. For far too long the Caloosahatchee has born a disproportionate share of adversity from Lake Okeechobee releases. Now is the time correct that imbalance.

Respectfully submitted,
Committee of the Islands
Lawrence M. Schopp
President