



# Protect. Educate. Inspire.

"Ding" Darling Wildlife Society - Friends of the Refuge

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

June 23, 2021

Dear Colonel Kelly,

The Army Corps of Engineers is in the final stages of developing and evaluating 6 scenarios with the goal of choosing one that will form the basis of LOSOM. We recognize that when creating LOSOM it won't be possible to satisfy all of the needs of the various stakeholders. However, we believe that, in order for this process to be deemed a success, LOSOM must be regarded as balanced by the majority of stakeholders. For this to happen:

1. Each stakeholder must see improvements on the issues that are critical to them compared to LORS 08.
2. Each stakeholder should experience roughly the same amount of benefit.
3. No stakeholder should experience notably more harm than do the other stakeholders.

At the June 17<sup>th</sup> PDT meeting, the Army Corps used a radar chart which contained a single score which indicated how well each of the 6 scenarios meets each of the various project objectives. We commend the Corps for taking this approach because while this is not a perfect tool, it does enable the Corps to demonstrate how each of the various scenarios achieves the goals listed above i.e. that each system or stakeholder group experiences roughly the same amount of benefit and/or harm.

At the June 17<sup>th</sup> PDT meeting the Corps also stated that in addition to analyzing how plans perform on average over the period of record, the Corps will also analyze each plan relative to how it performs under extreme conditions, such as droughts, hurricanes, or other types of regional flooding events. We commend the Corps for this as we strongly believe that the final evaluation of each of the six scenarios should be based on a combination of how well each plan performs on average and under extreme conditions.

We look forward to continuing to work with you to create a LOSOM that is widely regarded by stakeholders as being truly balanced.

Sincerely,

**Sarah Ashton**  
"Ding" Darling Wildlife Society  
Board President

**John Lai**  
Sanibel and Captiva Chamber of Commerce  
President & CEO