



# EVERGLADES COALITION

November 15, 2024

Drew Bartlett  
Executive Director  
South Florida Water Management District  
3301 Gun Club Rd,  
West Palm Beach, FL 33406

Sent via email to [drew.bartlett@sfwmd.gov](mailto:drew.bartlett@sfwmd.gov)

## **RE: Public-Private Partnerships and the Everglades Agricultural Area**

Dear Director Bartlett,

We write on behalf of The Everglades Coalition, nearly 60 organizations dedicated to protecting and restoring America's Everglades with a 12.2-million-constituent network of followers, regarding the unsolicited proposal submitted for the "Southland Water Resource Project," a plan to mine approximately 8,631 acres north of the Everglades Agricultural Area (EAA) Reservoir and Stormwater Treatment Area (STA). While the proposal was withdrawn from the South Florida Water Management District procurement process, the applicant expressed intent to continue pursuing it, requesting the District issue a "Letter of Project Identification." This request appears to reference Policy 2.3-e of the Palm Beach County Comprehensive Plan which strictly limits mining within the EAA:

*"Within the Agricultural Production Future Land Use designation, mining may be permitted **only** to support public roadway projects or agricultural activities, or water management projects associated with ecosystem restoration, regional water supply or flood protection, on sites identified by the South Florida Water Management District or the U. S. Army Corps of Engineers where such uses provide viable alternative technologies for water management." (emphasis added)*

**We urge the District to NOT supply the applicant with the requested letter.** First, the District has no means to properly evaluate the project. Because the Southland unsolicited proposal project was withdrawn, it has not been reviewed by District staff. A project of the type proposed has not previously been identified by the District as part of a water management project associated with ecosystem restoration, regional water supply or flood protection, and there is nothing to suggest that the applicant's request is supported by anything other than the applicant's desire to secure approval from the County of a commercial mine under the guise of a public water management project.

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As the District identified in its October 3, 2023, correspondence to the applicant, there are many questions associated with the project that must be answered. These questions pertain to: “potential mining operations impacts, seepage impacts and appropriate buffer zones to the EAA Reservoir Project’s STA and Reservoir, determination if geology supports an in-ground reservoir, regional water availability, drought operations, and canal conveyance capacity in the Miami Canal”, as well as an understanding of the plan for long term ownership, and operations and maintenance costs.

We agree with the need to answer these questions and additionally suggest the need to evaluate and clearly understand and quantify the project’s expected benefits and/or impacts to the environment, hydrology and water quality of the region. We also urge the District, when evaluating mining projects in the EAA, to ensure the financial structure of and the economic efficiencies achieved by any such proposal are guaranteed by security bonds or other equivalent mechanisms, and that assurances are in place to hold the District’s taxpayers harmless from long-term maintenance or remediation costs for the project. The District should further evaluate the qualifications and experience of the private entity that submits the proposal and the entity’s ability to perform the project and provide assurance that the project will be completed, maintained and effective in achieving its stated objectives. None of these questions can be answered without a detailed analysis conducted by District staff which must be done before the District can determine whether the project would be viable and meet the Everglades restoration needs of the taxpaying public. To be clear, there is no indication that the District or the U.S. Army Corps of Engineers has identified anything similar to the project proposed in this location as a functional part of any water quality or hydrological restoration plan for the Everglades.

The mining application submitted to the Florida Department of Environmental Protection presents the project as both a mining operation and a water supply reservoir. It claims that water stored during the wet season would be used to support Everglades restoration. However, when those benefits would occur is not clear, as the mining operation would not be completed until approximately **45 years from now**. The application to Palm Beach County is seeking approval for an excavation construction schedule with an anticipated completion date of 2069.

We are greatly concerned about the impact and precedent of allowing private mining activities to dictate the future of Everglades restoration in the EAA. Because Palm Beach County’s Comprehensive Plan contains clear language limiting mining in the EAA — language that has been judicially tested and strictly interpreted by the courts — it would be tempting for mining companies to seek to frame their commercial mining operations as “water resource projects” in an attempt to circumvent the Plan’s limitations. If the District issues documents like the requested “Letter of Project Identification,” without analyzing a potential project’s true impacts and benefits, the EAA’s future role in Everglades restoration could be reduced to scattered excavations chosen by mining interests, with water storage becoming a possible secondary function — only available once mining operations are completed, decades from now in the far distant future. We urge the District to carefully consider the long-term implications of such proposals and to prioritize comprehensive, science-driven restoration planning.

Next, while this specific proposal is not currently active, we anticipate similar proposals may surface in the future. **We urge the District to initiate and complete, along with its federal and other partners, a restoration plan for the EAA that determines the locations, nature, size and scope of water management features necessary to complete the successful restoration of the Everglades.** Only upon completion of

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such a plan can it be determined where and whether any mining operations can facilitate, and not dictate and limit, restoration planning. We urge the District to decline to provide piecemeal letters of support for any mining operation in the EAA until such a process and plan is complete.

We cannot allow the future of Everglades restoration planning in the EAA to be determined by commercial mining operations labeling the large holes they leave in the ground as water storage or management projects. Successful restoration of the Everglades cannot be at the mercy of the vagaries of the market for aggregate in the EAA and the self-interest of mining companies; nor is it in the public's best interests to work around mining activity that limits or substantially delays maximum Everglades restoration options.

We thank you for your consideration.

Sincerely,



Mark Perry  
Co-Chair



Kelly Cox  
Co-Chair