



Friends *of the* Everglades

January 29, 2024

Col. James Booth
District Commander
U.S. Army Corps of Engineers, Jacksonville District Jacksonville, FL 32207

Submitted via electronic mail to Western.Everglades@usace.army.mil

Re: Western Everglades Restoration Project

Dear Col. Booth:

In a March 28, 2023 letter, Friends of the Everglades expressed our concerns about the water-quality consequences of a proposal to remove the Wingate Mill Stormwater Treatment Area (STA) from the proposed Western Everglades Restoration Project (WERP) without offering an alternative that clearly produces that same result.

In the Draft Environmental Impact Statement issued Dec. 15, 2023, the Corps of Engineers and South Florida Water Management District have recommended a plan without the Wingate Mill STA or a comparable alternative. Friends of the Everglades remains concerned about the effects this will have on water quality in the ecologically delicate region of the Western Everglades. We previously asked for an analysis that would quantify the expected water quantity and quality flowing into Kissimmee Billy Strand and then into the Big Cypress National Preserve, an Outstanding Florida Water. The Corps and South Florida Water Management District chose not to do any water quality analysis on the Western Feeder Basin, even excluding from the report the analyses that led to sizing of the 4,050 acre Wingate Mill STA in ALTHR.

Rather than quantify the expected water quality in the proposed plan, the Corps and South Florida Water Management District simply assume that the Future Without Baseline will meet all water-quality standards, and therefore conclude there is no reason to include a second STA in the plan.

Moreover, the Corps and South Florida Water Management District assume all standards are met by merely adopting Best Management Practices and other source control programs. Yet there are no specific plans with expected reductions offered or even any other examples where such an approach has resulted in successfully meeting Outstanding Florida Water standards in South Florida.

The Draft Environmental Impact Statement has substituted assumptions and unsupported assertions for the quantitative assessment that would have allowed for an informed decision.

The loss of the STA also adversely affected quantities of flow into the Big Cypress.

Analyses in Appendix A, Annex 2 show decreased flows, hydroperiods and water levels in the Kissimmee Billy Strand and Big Cypress when the Wingate Mill STA is dropped. The plan sacrifices restoring water quantity even while ignoring the water-quality impacts. In addition, because of the location of the North Feeder STA, the plan diverts large volumes of water into Water Conservation Area 3A instead of restoring natural flow into the northern Big Cypress. The result is a missed opportunity for significant water-quantity and water-quality restoration of the Big Cypress National Preserve.

It is indeed unfortunate that so much of the recent public discourse on WERP has been filled with misinformation and *ad hominem* attacks, especially given the extensive analyses and professional conduct from your organization's capable staff. We advise you, however, to remain focused on the primary goal: Everglades restoration.

Restoration cannot succeed over the long term unless the water is clean — nor can it succeed if water quantity, timing, and distribution are distorted to dodge the responsibility for clean water. The proposed Western Everglades Restoration Plan falls short because of the decision to pass the water-quality problems to the next generation, which simply perpetuates the cycle of pollution, litigation, blame and runaway costs. As this plan progresses, we urge you to address the water-quality issues. Doing so would advance truly meaningful Everglades restoration.

Sincerely,

A handwritten signature in black ink, appearing to read "Eve Samples". The signature is fluid and cursive, with a large initial "E" and "S".

Eve Samples

Executive Director, Friends of the Everglades

Cc:

Adam Gelber, Director of Office of Everglades Restoration Initiatives, DOI

Steve Baisden, WERP Project Manager, ACOE

Mindy Parrott, Principal Federal Policy Analyst, SFWMD