Everglades
Law Center, Inc.
Defending Florida's Ecosystems and Communities

March 6, 2025

Lisa Amara
Zoning Director
Palm Beach County
2300 N Jog Road
West Palm Beach, FL 33411-2741

Subject: Southland Project and Comprehensive Plan Compliance

Dear Ms. Amara,

On behalf of Friends of the Everglades, we write to provide important context regarding the Southland Project and its compliance with the mining criteria for the Everglades Agricultural Area ("EAA") under Palm Beach County's Comprehensive Plan. We urge the County not to advance this project until the South Florida Water Management District ("SFWMD" or "District") has completed its evaluation pursuant to the District's Unsolicited Proposal Process and Section 255.065 Florida Statutes, and to recognize only the execution of a Comprehensive Project Agreement, if any, as evidence that the District has identified the project as a viable water resource initiative.

In November 2024, the Everglades Coalition, an alliance of nearly 60 local, state, and national organizations dedicated to restoring America's Everglades, wrote to SFWMD (letter attached) to express concerns that the Southland Project could set a harmful precedent for private, commercial mining operations being framed as public water resource projects, potentially undermining the integrity of Everglades restoration efforts while opening the door for similar proposals in the future. The Coalition letter also noted that while the Southland Project was initially submitted to SFWMD as an unsolicited proposal in July of 2024, it was later withdrawn by the applicant in September of 2024 before any public discussion or formal evaluation by the District. Given the lack of review, the Coalition urged SFWMD to withhold issuing a "Letter of Project Identification" for the project until a full, transparent evaluation is conducted to assess its long-term impacts on restoration, water availability, and regional water management.

On December 24, 2024, Southland resubmitted its unsolicited project proposal to SFWMD, and on December 31, 2024, SFWMD responded with a letter to project representative Matt Eidson, stating that the project would "likely" provide viable alternative technologies for water management and treatment. However, the letter also made clear that further engagement, technical review, coordination with Palm Beach County and the Florida

Department of Environmental Protection, as well as potentially significant project modifications would be necessary before SFWMD would make any final determination regarding its support of the project.

The December 31 letter further states:

> *"By way of this letter, the District concludes the first step in the unsolicited proposal process. While you pursue permits, the District will continue to work with you through the next steps in the project evaluation process which includes estimating an evaluation fee, formulating evaluation criteria, and fulfilling public engagement requirements."*

The SFWMD unsolicited proposal process[1] establishes a framework for evaluation, and only upon its conclusion can the District determine whether a project qualifies as a viable water resource initiative. Because SFWMD had completed only Step 1 as of December 31, the letter cannot reasonably be considered an identification of the project as meeting that standard.

Although SFWMD has stated that no final determination has been made, Southland representatives have repeatedly characterized the December 31 letter as an endorsement of the proposal as a water resource project. This is evident in multiple comments and responses in the County's Development Review Officer (DRO) process, as shown below.

> **DRO Comment: From Planning 2/13/2024:** *"Please submit a revised letter from the appropriate agency that claims the project for water resources. The one submitted by the SFWMD only acknowledges the current request and that further information is required. . . The only way to clearly demonstrate compliance/consistency with the*

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[1] The district's unsolicited proposal process contains seven steps:

Steps 1-**2**- Entails the creation and submission of a project proposal that demonstrates how the project meets the definition of a Qualifying Project under section 255.065(1)(i), Florida Statutes, along with an application fee. In **Step 3** the District determines whether the project meets the definition of a Qualifying Project under state law, whether it will move forward with evaluating the Unsolicited Proposal, and whether the District will consider any additional proposals for a similar project. This step involves the payment of additional fees, the establishment of Evaluation Criteria to evaluate the project as well as possible Governing Board review. **Step 4** provides procedures for considering and ranking additional proposals for any similar projects and requires a public meeting for the Evaluation and Selection Committee to discuss and rank all proposals based on the specified evaluation criteria. If the District determines not to accept additional proposals, then the procedures require two public meetings before the Governing Board and / or the Evaluation and Selection Committee. As a result of the second meeting, the Committee will make a written recommendation containing the evaluation results and a Public Interest Determination Report which must be published in the Florida Administrative Register for at least 7 days. **Steps 5 -7** involve negotiating and entering into a project agreement relative to an unsolicited proposal. If additional proposals were accepted, the District may negotiate with these entities in ranked order until negotiations successfully result in an executed project agreement.

FLUE policy, is to provide the documentation that clearly states the intent of the project from the agency claiming the project for those purposes."

Southland Response: *"See SFWMD letter from Drew Bartlett, Executive Director of the SFWMD dated 12/31/24, which confirms that the SFWMD has reviewed the proposed water resource project in accordance with the PBC Comprehensive Plan Requirements and has identified the proposed site as a water resource project having the ability to provide viable technologies for both water management and water treatment for ecosystem restoration complementary to the EAA Reservoir complex and surrounding infrastructure."*

The December 31 letter, however, does not 'claim the project for water resources', nor does it indicate that SFWMD has completed its evaluation. Instead, it explicitly states that further steps are required before any such determination can be made.

More recently, in Southland's February 13, 2025, DRO resubmittal (Minor DRO Resub 5), Planning staff again requested documentation from the appropriate agency explicitly identifying the project as a water resource initiative:

Comment 1, from Planning: Per 10-28-24 resub: *"Please submit a revised letter from the appropriate agency that claims the project for water resources. The one submitted by the SFWMD only acknowledges the current request and that further information is required...The only way to clearly demonstrate compliance / consistency with the FLUE policy, is to provide the documentation that clearly states the intent of the project from the agency claiming the project for those purposes."*

Southland Response: "*Please see letter from Drew Bartlett to Matt Eidson dated December 31, 2024."*

However, as noted previously, the December 31 letter does not identify the Southland project as an approved water resource project. It simply acknowledges receipt of the proposal and outlines the next steps in the evaluation process.

In another instance, Planning staff directly asked whether the project had been formally presented to the SFWMD Governing Board or included in long-range planning efforts.

DRO Comment from Planning 11/04/2024: "*Has the project been presented to the SFWMD Governing Board? Has it been added to their long range plans?"*

Southland Response: "*The project was presented to the SFWMD Governing Board in October 2023. Additionally, the subject site is identified by the SFWMD as having the ability to provide viable technologies for both water management and water treatment for ecosystem restoration consistent with the SFWMD long range plans, SB 10 and other SFWMD Everglades Restoration plans."*

While the applicant states that the project was 'presented to the SFWMD Governing Board in October 2023,' a review of the video from this meeting (at the 44-minute mark) demonstrates that the referenced ‘presentation’ consisted of a single representative of the applicant speaking for approximately 1 minute and 20 seconds during general public comment about his company’s internal initial evaluation of the proposed project.

This item was not publicly noticed on the agenda, there was no presentation or staff report related to the project, and there was no discussion or analysis by District staff or the Governing Board.

Furthermore, because the project has never been formally presented to the SFWMD Governing Board, approved by the District, or even evaluated by SFWMD staff, the project has not been added to any SFWMD long-range plans for Everglades restoration or otherwise—contrary to the representations of the applicant.

Due to concerns about how Southland has characterized the December 31 letter, the Coalition sent a follow-up letter to SFWMD on February 7, 2025, requesting official clarification of the District’s position regarding the project. See attached letter.

At the February 14, 2025 SFWMD governing board meeting, (at the 31 minute mark), Executive Director Drew Bartlett clarified the District’s position on the Southland project, (transcript attached) and reiterated that SFWMD has not yet made a determination on the project’s ultimate viability.

> *“After staff review and vetting, if staff concludes it is a viable storage and treatment project that will provide regional benefits and it will not impact the construction or operation of the EAA Reservoir project, the staff will bring the project to the Board for [its] consideration before entering into what's called a Comprehensive Agreement as outlined in Florida statutes.*
>
> *We project that the staff review of this proposal will happen over the next year. If staff concludes that it is viable and does not conflict with the EAA Reservoir Project, only then will the District staff bring it to the Board for your consideration.”*

On February 21, 2025, SFWMD formally responded to the Coalition’s second letter (attached), reinforcing Director Bartlett’s February 14, 2025 remarks and reaffirming that the District’s evaluation remains ongoing and that no final determination has been made.

> *“We will now turn our attention to thoroughly evaluating the project proposal. If staff concludes that it is a viable storage and treatment project that will provide regional benefits, and that it will not impact the construction or operation of the EAA Reservoir Project, District staff will bring the project to the Governing Board for consideration before entering into a Comprehensive Agreement pursuant to Florida Statute.*

The District will follow our Unsolicited Proposals Process, developed pursuant to the Public-Private Partnerships Statute of Florida, to consider the Southland Water Resource Project."

In reviewing this project, SFWMD is bound by Section 255.065, Florida Statutes, which establishes extensive review and analysis obligations before an unsolicited proposal project can be approved. This includes evaluating financial feasibility, regulatory compliance, environmental impact, and long-term operational responsibilities to ensure the project serves a legitimate public purpose. Agencies are not required to approve any unsolicited proposal and may reject one at any point before executing a Comprehensive Project Agreement.

For these reasons, an executed Comprehensive Project Agreement is the only meaningful benchmark for determining whether SFWMD has identified the project as a viable water resource initiative. Until that agreement is in place, key aspects of the project—such as scope, feasibility, regulatory compliance, financial terms, and mitigation of harm—remain unresolved, and any assumption of approval would be premature.

Given the potential for project changes during SFWMD's review, the County should also refrain from considering any form of contingent or conditional approval before the execution of the Comprehensive Project Agreement. Any early approval, even if conditional, risks becoming outdated or misaligned with the final project. Premature consideration undermines the integrity of the regulatory process, exposes the County to unnecessary controversy as well as significant legal and procedural risks, and creates the possibility of approving a project that SFWMD ultimately rejects. If negotiations between Southland and SFWMD fail before an agreement is executed, the County could find itself having approved a mining operation that the District declined to accept.

There is no benefit to the County in approving the project before an executed Comprehensive Project Agreement, nor does waiting impose harm on the applicant. Section 255.065(7)(a), Florida Statutes, explicitly requires that no development may begin until an agreement is in place, meaning that County approval prior to that point serves no practical purpose. Any premature approval would be unnecessary at best and problematic at worst, particularly if the project changes or fails to secure final approval from SFWMD.

We appreciate the thoughtful review that County staff is conducting regarding this project. While Palm Beach County retains the sole authority to determine whether the Southland Project meets the Comprehensive Plan's strict criteria for mining within the EAA, SFWMD is responsible for evaluating unsolicited proposals for alignment with restoration and water management objectives. It is essential that SFWMD be allowed to complete its evaluation before any conclusions are drawn about the project's viability as a water resource initiative.

Past decisions on mining in the EAA have faced intense scrutiny with outcomes that reinforce the need for a careful and thorough review. Given this history, it is all the more critical that the County ensure its decision is based on a final determination by SFWMD that the project will, in fact, serve a valuable water resource purpose and not harm adjacent restoration features. Accordingly, **we urge the County to recognize only an executed Comprehensive Project Agreement between Southland and SFWMD as sufficient evidence that the District has identified the project as a viable water resource initiative and to not grant any conditional or contingent approvals prior to that point.**

Thank you for your time and careful consideration of this matter. Please include this letter and attachments within the project file.

Sincerely,

Lisa Interlandi
Everglades Law Center
561-310-2772
lisa@evergladeslaw.org

Cc: Whitney Carroll, Executive Director, PBC Planning, Zoning and Building Department
Thuy Shutt, PBC Planning Director
Deborah Drum, PBC Environmental Resources Management Director
Patrick Rutter, PBC Deputy County Administrator
Drew Bartlett, SFWMD Executive Director
SFWMD Governing Board
Eve Samples, Executive Director, Friends of the Everglades
Richard Grosso, Esq.

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

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.

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

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

EVERGLADES COALITION

February 7, 2025

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

Sent Via Email to dbartlett@sfwmd.gov
CC: SFWMD Governing Board

RE: Southland Water Resource Project

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, requesting that the South Florida Water Management District clarify the statements made in its December 31, 2024, letter regarding the Southland Water Resource Project, which suggested that the project "will likely provide viable alternative technologies for both water management and water treatment for ecosystem restoration." As the District has not yet completed a full technical evaluation, these statements could be misinterpreted as an endorsement of the project. Additionally, we request that this matter be brought before the Governing Board for public discussion to ensure transparency and allow for stakeholder input before any further review of the project.

As you are aware, Palm Beach County's Comprehensive Plan (Policy 2.3-e) prohibits commercial mining within the Everglades Agricultural Area unless it is exclusively for one of three identified purposes[1].

> "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***

[1] See:
1000 Friends of Florida and Sierra Club, v. Palm Beach County and Bergeron;
1000 Friends of Florida, Sierra Club, and Florida Wildlife Federation, v. Palm Beach County and Rinker Materials of Florida, Inc., d/b/a Cemex;
United States Sugar Corporation and SBG Farms, Inc. v. 1000 Friends of Florida, Sierra Club, Florida Wildlife Federation, and Palm Beach County, Appellees

> ***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)

Since at least as early as last summer, Southland has been seeking a "Letter of Project Identification" from SFWMD to classify its mining proposal as a water management project, a necessary requirement for consideration under Palm Beach County's Comprehensive Plan.

The Everglades Coalition wrote to the District in November 2024 requesting that no such letter be issued because Southland's unsolicited proposal, initially submitted in July and later withdrawn in September, had not been publicly vetted, evaluated by staff, or previously identified by SFWMD as part of an authorized water management project. The Everglades Coalition did not receive a response to its letter.

Southland resubmitted its unsolicited proposal to SFWMD on December 24, 2024, and on December 31, 2024, the District responded, identifying the project as a "Qualifying Project" under Section 255.065(1)(i), Fla. Stat. (Step 1 of the SFWMD Unsolicited Proposal Process). The District's letter went beyond the SFWMD Unsolicited Proposal Process, however. Relative to the mining restrictions in Palm Beach County's Comprehensive Plan, it states:

> Based on an initial review of the project and subsequent discussions, **the District believes that, at this time, on the identified site, connected to a District canal with the right configuration, the project will likely provide viable alternative technologies for both water management and water treatment for ecosystem restoration** complimentary to the EAA Reservoir complex and surrounding infrastructure. With a completed connection to STA 5/6, the project would provide more capacity to maintain those constructed wetlands during the dry season and complement several other concurrent water management projects currently underway. (emphasis added)

It is unclear if the District intended this correspondence to constitute the District's official determination that the Southland project will serve as a viable water management project associated with ecosystem restoration, regional water supply, or flood protection such that it would qualify for further consideration under Palm Beach County's Comprehensive Plan. However, the letter makes clear that significant additional technical questions about the project remain to be addressed.

The District previously identified significant unanswered questions about the project, including potential mining impacts, seepage risks, geological suitability, water availability, drought operations, canal capacity, and long-term ownership and maintenance costs. Beyond these, we are deeply concerned by the precedent of allowing mining companies to dictate the future of Everglades restoration, particularly combined with the lack of long-term restoration planning for the EAA that could identify the general location, nature, size, and scope of water management features necessary to complete the successful restoration of the Everglades.

The SFWMD unsolicited proposal process establishes a clear process for evaluation and it is at the conclusion of that process, not prior to, that the SFWMD could determine whether a project constitutes a viable water resource initiative. As SFWMD had not yet completed or even initiated this analysis, the December 31 letter contains conclusions which are premature and risk being misinterpreted as an

endorsement. We are aware that Southland has already submitted the December 31 letter to the Palm Beach County Zoning Department in support of its application, where it could be misconstrued as the official approval from SFWMD.

We are disappointed by the timing and lack of transparency of the unsolicited proposal's resubmittal on Christmas Eve, when SFWMD offices were closed, and SFWMD's response on New Year's Eve, as well as the failure to bring this item to the Governing Board to allow public consideration, engagement and discussion on an issue of significant public concern. The uncertainty of how the District's correspondence will be interpreted by both Southland and Palm Beach County compounds these concerns.

The Everglades Coalition requests the District immediately clarify the statements made in the December 31 letter to confirm that the ultimate determination relative to the project's viability will be made only after the District completes its full technical evaluation. Before further SFWMD review of the project, the Coalition requests that this matter be brought before the Governing Board for public discussion and to ensure that decisions regarding the project are based on a transparent evaluation with input from all stakeholders.

We thank you for your consideration.

Sincerely,

Mark Perry
Co-Chair

Kelly Cox
Co-Chair

Transcript of SFWMD Executive Director Bartlett Comments re: Southland at SFWMD Governing Board meeting - 2/14/2025

Director Bartlett: "The first thing I'd like to do today is address the Southland Reservoir proposal, as you know last year Phillips and Jordan approached the District with a proposal to build storage on private land in the Everglades Agricultural Area.

Now, for context, in a water management system, storage is the critical component to conduct flood control without harming downstream resources, downstream water bodies. And once it's in the storage, of course, you have it during the dry season for water supply for people and the environment. So naturally when more storage opportunities present themselves the District will entertain the idea by doing our due diligence to see if those opportunities are meaningful and feasible. In this case, the District is interested in more storage and more treatment in this area to help manage Lake levels, help control harmful estuary discharge, and send more water South. However we cannot just jump into a proposal.

There is a process under state law to evaluate these proposals. It's called the Public Private Partnerships statute which provides guidance for evaluating unsolicited proposals and that's the process the District is using. The District's Unsolicited Proposals Process can be found on our website under Procurement and all the Unsolicited Proposals that the District has received can also be found on that website. I provided you a summary, a high level summary, of what that process is. I've got copies of, extra copies, if anyone in the audience would like one, but there's a more detailed explanation of that process on the website.

On that web page is the Southland Reservoir proposal and a letter written by District staff sent to Phillips and Jordan conveying where we were in our review and evaluation and the steps necessary to continue our evaluation. The letter does include language regarding the likelihood of the project that the company can use to engage Palm Beach County requirements. Palm Beach County is looking at it from a land use lens, but the Water Management District is looking at it purely from a water management lens.

Now while we have not conducted our full review, we do know that through our own experience that with the right engineering and configuration, storage and treatment can be accomplished in the area that will improve our operations for the benefit of the environment and people. Ultimately, after staff review and vetting, if staff concludes it is a viable storage and treatment project that will provide regional benefits and it will not impact the construction or operation of the EAA Reservoir project, the staff will bring the project to the Board for your consideration before entering into what's called a Comprehensive Agreement as outlined in Florida statutes.

We project that the staff review of this proposal will happen over the next year. If staff concludes that it is viable and does not conflict with the EAA Reservoir Project, only then will the District staff bring it to the Board for your consideration. At this time there's really nothing for you to review or approve. Matt Eidson from Philips and Jordan is in attendance if you have any questions regarding their proposal after I conclude my Executive Director's report. I'll be here to answer any process questions with Maricruz's support, and it just goes without saying, as always, we appreciate any engagement, any stakeholder engagement we get on any of our projects, including this project, from the public, the Board, anybody. It only makes projects better and I suspect you might get some engagement on this project. All right, that's all I have for the Southland Reservoir Proposal."

SOUTH FLORIDA WATER MANAGEMENT DISTRICT

February 21, 2025

Via Email: Kelly.Cox@audubon.org and MPerry@floridaocean.org

Mr. Mark Perry
Ms. Kelly Cox
Everglades Coalition
P.O. Box 1709
Stuart, FL 34995

Subject: Southland Water Resource Project

Dear Mr. Perry, Ms. Cox, and Everglades Coalition Members:

The South Florida Water Management District (District), along with its many partners and stakeholders, has made great progress in recent years on the Comprehensive Everglades Restoration Plan (CERP).

As you know, on January 10, 2023, Governor Ron DeSantis signed Executive Order 23-06, (*Achieving Even More Now for Florida's Environment*). With his order, the Governor called upon the District to make every effort to advance Everglades restoration projects to ensure meaningful progress over the next four years, including all CERP storage components within the Lake Okeechobee watershed. Executive Order 23-06 was issued exactly four years to the day after he signed Executive Order 19-12 (*Achieving More Now for Florida's Environment*), which resulted in record environmental funding, expedited Everglades projects, and water quality improvements.

To date, we have celebrated 75 ribbon cuttings, ground breakings, and major milestones on Everglades projects since 2019, and many of you have played a significant part in these celebrations.

The District is in receipt of the letter you sent on February 7, 2025, regarding the Southland Water Resource Project. At the February 13, 2025, Governing Board Meeting, I discussed the Southland Water Resource Project, including the letter we sent to Phillips and Jordan, Inc., as part of my remarks during the Executive Director's Report.

We will now turn our attention to thoroughly evaluating the project proposal. If staff concludes that it is a viable storage and treatment project that will provide regional benefits, and that it will not impact the construction or operation of the EAA Reservoir Project, District staff will bring the project to the Governing Board for consideration before entering into a Comprehensive Agreement pursuant to Florida Statute. The District will follow our Unsolicited Proposals Process, developed pursuant to the Public-Private Partnerships Statute of Florida, to consider

the Southland Water Resource Project. This process, and all unsolicited proposals submitted to the District, can be found at SFWMD.gov/Procurement.

We truly appreciate the Everglades Coalition's long-standing support for expediting storage and treatment opportunities through CERP and Restoration Strategies to help the Everglades, Lake Okeechobee, and our estuaries. The District remains keenly focused on significantly advancing the largest ecosystem restoration effort in the world with truly meaningful projects that benefit the people and the environment of South Florida.

Sincerely,

Drew Bartlett
Executive Director

c: SFWMD Governing Board Members