



# Everglades Coalition

October 5, 2020

South Florida Water Management District Governing Board  
3301 Gun Club Road  
West Palm Beach, FL 33406

*Sent Via Email*

## **RE: Resolution No. 2020 – 1016 – iHeart Media, Inc. Radio Antennae Project**

Dear Chairman Goss:

On behalf of the Everglades Coalition, an alliance of 61 local, state, and national conservation groups focused on restoration and protection of the Greater Everglades, we urge you to not approve land use in the Bird Drive Recharge Area (BDRA) that would interfere with successful implementation of the Comprehensive Everglades Restoration Plan (CERP). We have concerns that the current proposal by iHeart Media and Entertainment to develop a radio antennae in the BDRA may present future conflicts with restoration. The proposed project site includes sensitive wetlands in western Miami-Dade County that are within the CERP footprint, on land that has been acquired for restoration purposes and has federal grant encumbrances for those purposes. We urge the Governing Board to deny any project that may interfere with achieving ecosystem benefits Congressionally authorized under CERP.

The Bird Drive Recharge Basin (Yellow Book component U) is a critical CERP project for the Southeastern Everglades. The purpose of the feature is to recharge groundwater and reduce seepage from Everglades National Park buffer areas by increasing water table elevations east of Krome Avenue. The project will also provide C-4 flood peak attenuation and water supply deliveries to the South Dade Conveyance System and Northeast Shark River Slough. Further, healthy ecology in the BDRA is critical for recharging groundwater, maintaining wetland viability, and providing habitat for threatened and endangered species such as the Florida bonneted bat, eastern indigo snake, wood stork, Everglade snail kite, Florida panther, and American crocodile. The Everglades Coalition strongly opposes non-restoration uses of project lands that compromise the integrity or success of CERP, especially when the land has been purchased specifically for restoration.

1000 Friends of Florida  
Angler Action Foundation  
Audubon Florida  
Audubon of Southwest Florida  
Audubon of the Western Everglades  
Audubon Society of the Everglades  
Backcountry Fly Fishers of Naples  
Calusa Waterkeeper  
Cape Coral Friends of Wildlife  
Center for Biological Diversity  
Conservancy of Southwest Florida  
Defenders of Wildlife  
“Ding” Darling Wildlife Society  
Earthjustice  
Environment Florida  
Everglades Foundation  
Everglades Law Center  
Everglades Trust  
Florida Bay Forever  
Florida Conservation Voters Education Fund  
Florida Defenders of the Environment  
Florida Keys Environmental Fund  
Florida Native Plant Society  
Florida Oceanographic Society  
Friends of the Arthur R. Marshall  
Loxahatchee National Wildlife Refuge  
Friends of the Everglades  
Hendry-Glades Audubon Society  
International Dark-Sky Association,  
FL Chapter  
Izaak Walton League of America  
Izaak Walton League Florida Division  
Izaak Walton League Florida Keys Chapter  
Izaak Walton League Mangrove Chapter  
Lake Worth Waterkeeper  
Last Stand  
League of Women Voters of Florida  
Martin County Conservation Alliance  
Miami Pine Rocklands Coalition  
Miami Waterkeeper  
National Audubon Society  
National Parks Conservation Association  
National Wildlife Refuge Association  
Natural Resources Defense Council  
North Carolina Outward Bound School  
Ocean Research & Conservation Association  
Peace River Audubon Society  
Reef Relief  
Sanibel-Captiva Conservation Foundation  
Sierra Club  
Sierra Club Florida Chapter  
Sierra Club Broward Group  
Sierra Club Calusa Group  
Sierra Club Central Florida Group  
Sierra Club Loxahatchee Group  
Sierra Club Miami Group  
South Florida Audubon Society  
Southern Alliance for Clean Energy  
The Florida Wildlife Federation  
The Institute for Regional Conservation  
The National Wildlife Federation  
Theodore Roosevelt Conservation  
Partnership  
Tropical Audubon Society

*Committed to full protection and restoration of America’s Everglades*

The Everglades Coalition acknowledges the land exchange component of this proposal, and its direct impact on the timely implementation of other CERP efforts in the region: iHeart Media and Entertainment is in ownership of key parcels of land needed for the Biscayne Bay Coastal Wetlands (BBCW) project. The applicant has proposed a transaction that would result in SFWMD ownership of the parcel needed for BBCW in exchange for land in the BDRA for construction of the proposed radio tower. Our community applauds and shares SFWMD's commitment to BBCW. At the same time, SFWMD must reject efforts to pit one CERP project against another. Successful implementation of both BBCW and BDRA will be essential to achieve full restoration of the Greater Everglades and to safeguard Florida's water supply. We cannot trade-off one project footprint for another.

It is notable that the Bird Drive Recharge Basin project will be included in the upcoming *Southern Everglades Study* by the U.S. Army Corps of Engineers, as referenced in the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) Project Management Plan. This report will likely refine the project goals and scope of BDRA project as it relates to future CERP implementation; the Everglades Coalition is particularly concerned about advancing permanent infrastructure within the footprint of BRDA as this restoration project is to be imminently studied.

Implementing restoration is essential for the future of the Greater Everglades and to safeguard Florida's water supply. Each CERP project provides unique ecosystem benefits, while also working within the larger system of infrastructure to maximize overall restoration success. Both BDRA and BBCW are essential projects and must be fully implemented for the health of the Southeastern Everglades. We again urge the Governing Board to deny any project that may interfere with achieving ecosystem benefits Congressionally authorized under CERP.

Sincerely,



Mark Perry  
Co-Chair



Marisa Carrozzo  
Co-Chair

*Committed to full protection and restoration of America's Everglades*