



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 purposes¹.

*"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](#)

The Everglades Coalition is a 501(c)3 alliance of local, state, and national conservation organizations dedicated to the full protection and restoration of America's Everglades.

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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

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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