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AFFILIATED WITH THE NATIONAL WILDLIFE FEDERATION

September 6, 2022

Colonel James Booth
Commander, Jacksonville District
701 San Marco Blvd.
Jacksonville, Florida 32207

Re: Western Everglades Restoration Project Tentatively Selected Plan

Dear Colonel Booth:

The Florida Wildlife Federation (Federation), on behalf of approximately 100,000 members and supporters, writes to express concern over the Tentatively Selected Plan for the Western Everglades Restoration Project (WERP).

In brief, the siting of the Wingate Mill Stormwater Treatment Area (STA) at the Kissimmee Billie Strand Swamp (KBSS) is inconsistent with the WERP goal to “Promote plant and animal diversity and foster conditions for native species.” While an STA is designed to result in hydrological restoration, siting the Wingate Mill STA in KBSS will destroy an existing natural wetland and upland area that is vitally important to wildlife. This type of habitat is growing increasingly rare in modern Florida.

Not only is KBSS an ecologically significant wetland, it is also a recognized wildlife corridor with documented panther use (*see map*). Given the presence of old growth cypress swamp, pine islands and native prairies, the KBSS is not an environmentally appropriate location for the proposed Wingate Mill STA. The Federation recommends the Army Corps of Engineers (Corps) evaluate and determine an alternate location for the proposed STA in an area that has already been disturbed.

As part of this evaluation, the Federation recommends the Corps and agency partners conduct a comprehensive water quality analysis to address potential impacts to the downstream Big Cypress National Preserve (BCNP). While BCNP is outside of the project area, water transcends project boundaries and it would be prudent to consider project ramifications on downstream lands, especially as water quality in BCNP is superior to that of the Everglades system. In fact, BCNP is designated as an Outstanding Florida Water (OFW), which designation disallows any water quality degradation from its current state.

We suggest the evaluation also address water levels. It is well established from both WCA-2 and WCA-3A that exceedingly high-water levels can be destructive to pine islands, hardwood hammocks, deer and wading birds. As such, the evaluation needs to analyze water depth, flow rates, hydroperiod and water quality impacts if and where an STA is constructed for the WERP.

With public input over the last weeks, the Federation has been informed that Corps and South Florida Water Management District are reevaluating the Wingate Mill STA feature. The Federation is hopeful that through this evaluation, a much more suitable site will be decided upon for the STA, and one that avoids undisturbed natural areas.

The Federation looks forward to continuing collaboration with the Corps as WERP projects are considered and very much appreciate your consideration of our recommendations.

Please do not hesitate to contact me at 239-248-4494 or meredithb@fwfonline.org to discuss further.

Cordially,

A handwritten signature in black ink that reads "Meredith Budd". The signature is written in a cursive, slightly slanted style.

Meredith Budd
Regional Policy Director

cc: Lt. Col. Todd F. Polk, USACOE
South Florida Water Management District Board Members
Preston Robertson, FWF President & CEO
Franklin Adams, FWF Big Cypress Region Advisor