

Neal McAliley
Shareholder
(305) 530-4039 Direct Dial
nmcAliley@carltonfields.com

Atlanta
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January 29, 2024

Ms. Melissa Nasuti
U.S. Army Corps of Engineers
701 San Marco Blvd.
Jacksonville, Florida 32207
Email: Western.Everglades@usace.army.mil

Via Email

Re: Comments of Bergeron Everglades Foundation on Draft Project Implementation Report for the Western Everglades Restoration Project

Dear Ms. Nasuti:

We are writing to provide the comments of the Bergeron Everglades Foundation on the draft Project Implementation Report (“PIR”) for the Western Everglades Restoration Project (“WERP”). This letter supplements previous comments by the Foundation and its representatives, including our August 10, 2022 letter to Colonel James Booth.

The Bergeron Everglades Foundation is a nonprofit organization whose mission is the restoration, conservation and protection of the beloved Everglades ecosystem and the wildlife that call it home – from sawgrass to seagrass. Its vision is to maintain a flourishing and sustainable ecological balance, preserve the integrity of its diverse ecosystems, and safeguard the rich tapestry of biodiversity and cultural heritage. The Foundation envisions a future where the Everglades’ natural beauty is cherished and protected, leaving a lasting legacy for countless generations to come. It is committed to inspiring a deep connection with the Everglades, fostering a sense of responsibility and deep desire to preserve it forever. Through the Foundation’s unwavering commitment to advocacy, environmental education, policy work, monitoring of legislation, research and wildlife conservation programs, it strives to protect the Everglades, fostering a harmonious existence between humans and nature.

The Foundation is very supportive of the overall proposal for WERP. The Big Cypress region and western Everglades is an important part of the South Florida ecosystem. The landscape in this area is different than areas further east, with a mosaic of wetlands, uplands, forests, and open prairies. In this mosaic are some pristine natural areas that have been protected by their isolation from major roadways and water management infrastructure. The region also is one of the few places in South Florida where high quality natural areas coexist with low intensity agricultural activities such as ranching, and it is the home to people who want to live in harmony with the land. The Foundation supports efforts to improve the ecological

health of this area while preserving a rural way of life. As regards the Tentatively Selected Plan (“TSP”) for WERP, the Foundation supports the project elements in Regions 1, 3, and 4.

The Foundation has significant concerns with the Corps’ proposals for Region 2, and in particular, the area in the West Feeder Basin around the Wingate Mill Canal in southern Hendry County. This area is west of the Seminole Tribe’s Big Cypress Reservation and north of the Big Cypress National Preserve (“BCNP”). The area is served by the Wingate Mill Canal, which drains to the West Feeder Canal, which in turn connects to the L-28 Interceptor Canal. Unlike most of the other portions of the WERP project area which are in public or tribal ownership, most of the properties in this Wingate Mill area are privately owned. Some of the relevant features of this area are shown below in Figure A.8 from the draft PIR.

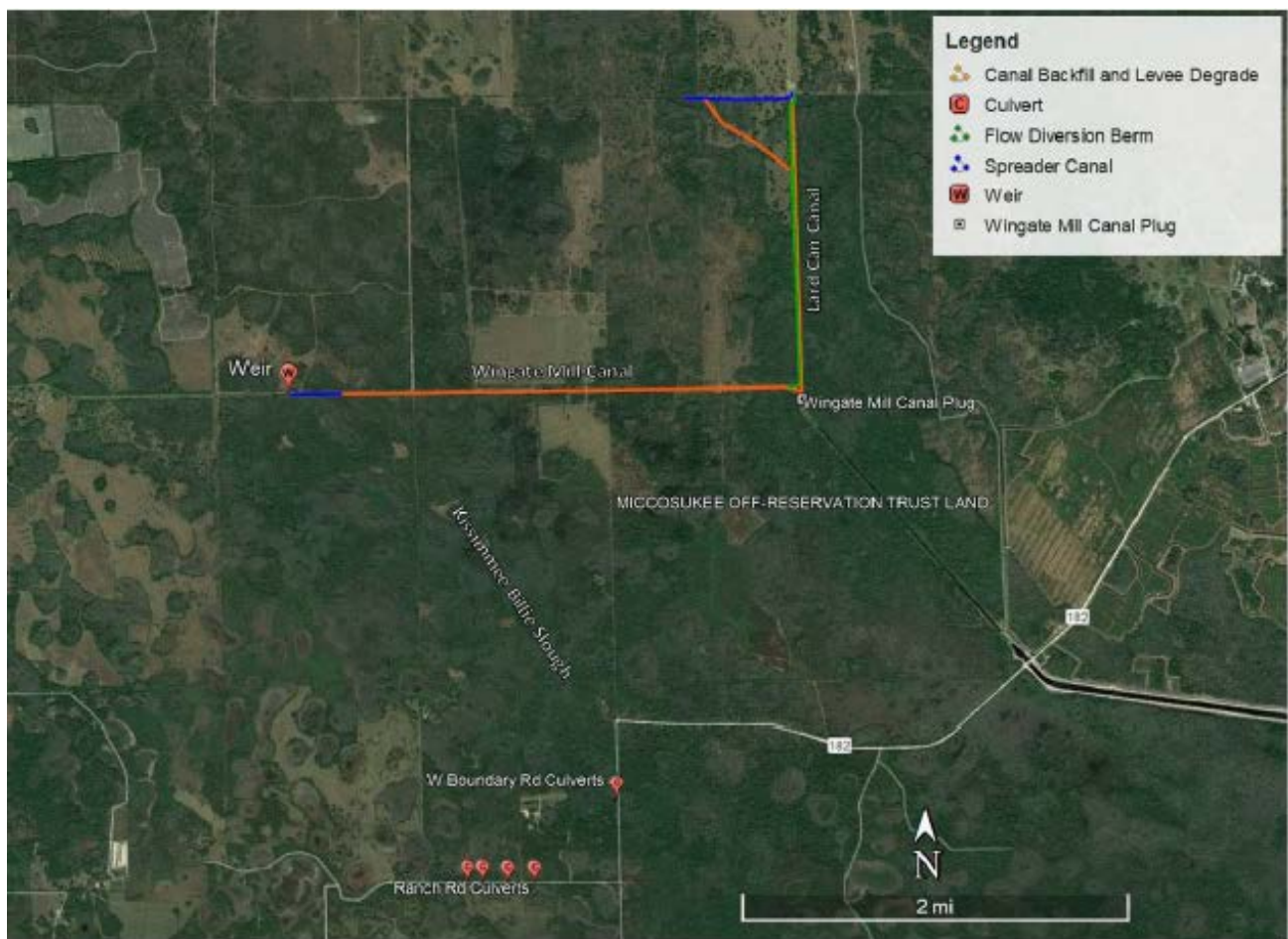


Figure A-8. Wingate Mill Canal Plug Location

The most important natural feature of the Wingate Mill area is the Kissimmee Billie Strand, shown above in Figure A-8. This is a linear, forested wetland that runs in a north-northwest to south-southeast direction. The northernmost portions of Kissimmee Billie Strand are on private property, with more southerly portions located on the Seminole Tribe lands and the Big Cypress National Preserve. (In Figure A-8, the area labeled “Kissimmee Billie Slough”

all is on private property; the Seminole Tribe's property starts at the West Boundary Road.). The strand is hydrated only by rainfall, because the agricultural areas to the north are drained by the Wingate Mill Canal which sends its water to the West Feeder Canal and L-28 Interceptor. This means that essentially, no phosphorus is introduced to this area as a result of human activities.

The Kissimmee Billie Strand in this area is simply breathtaking. It is a pristine strand that was never impacted to the same extent as most of the Big Cypress watershed. This means that there are 500-year old trees in a mature palustrine forest, among the very oldest trees in South Florida. Here is a photograph of one of the ancient cypress trees there:



The strand is teeming with wildlife, including Florida panthers, black bears and other endangered species. The video accessible at this link was taken in the strand west of the Seminole Big Cypress Reservation and shows Florida panthers using the property: https://www.dropbox.com/scl/fo/3j5a5hc893v65p5uzm0b1/h?dl=0&preview=STC_0021+2.MOV&rlkey=1zmg00ndr99t5npr7pop7jass. The photograph below (taken by Carlton Ward, Jr.) shows a black bear in the same privately-owned portion of Kissimmee Billie Strand.



Most people do not know about this area because it is in private ownership, but its beauty and ecological importance rivals any other location in South Florida. This area may not be managed by the National Park Service, or controlled by a Native American Tribe, but it is every bit as deserving of protection.

It seems that the Wingate Mill area has been an afterthought in the WERP plan development process. The original focus of Comprehensive Everglades Restoration Plan (“CERP”) projects in this area was to address environmental issues further east and south, by increasing the amount of water delivered to the western side of Water Conservation Area 3A and BCNP, and also by reducing phosphorus levels in water delivered from the L-28 Interceptor to areas of the Miccosukee Tribe’s reservation. In more recent years, the focus of WERP planning has been to prioritize and satisfy requests by stakeholders downstream, including the Seminole Tribe, Miccosukee Tribe and BCNP. The Bergeron Everglades Foundation has no objections to stakeholders wanting to protect their lands; they are no different in this respect than any other property owner. However, in working to satisfy requests related to downstream areas, WERP planners have overlooked the ecological values of the West Feeder Basin in general, and the Wingate Mill area specifically.

Unfortunately, the TSP appears to use the Wingate Mill area as a dumping ground for features designed to benefit downstream stakeholders. In particular, because the Seminole and Miccosukee Tribes want to decrease phosphorus concentrations in downstream canals, project planners have decided to solve the problem by treating the Wingate Mill area as a water quality sacrifice zone. The original TSP called for building a Stormwater Treatment Area directly on top of the northern portion of Kissimmee Billie Strand in the Wingate Mill area, which would have completely destroyed the old growth wetland forest. The Bergeron Everglades Foundation raised concerns about this in previous comments, and asked that the Corps relocate the Stormwater Treatment Area. The revised TSP removes the Stormwater Treatment Area from the Kissimmee Billie Strand, but does not move it to a better location. Instead, the TSP has been revised to simply send the high phosphorus water directly into the Kissimmee Billie Strand, in the expectation that it will be clean enough by the time it gets to the BCNP downstream. This will be the first time that polluted water from the drainage canals will be directed into this pristine and untouched natural area, because those canals currently drain into the West Feeder Canal.

The Foundation is very concerned about this new plan for the Wingate Mill area, and believe that the draft PIR does not adequately consider or disclose effects of this new plan there. We summarize our concerns regarding water quality and flooding effects below.

I. The Draft PIR Does Not Adequately Address Water Quality Concerns in the Wingate Mill Area

The draft PIR's discussion of water quality in the Wingate Mill area is completely inadequate. To start with, the document does not clearly describe water quality conditions there today. There is only limited data from the Wingate Mill Canal itself, which apparently was collected years ago over a short period of time and may not be representative of current conditions. No data is presented regarding phosphorus levels in the Kissimmee Billie Strand today, which presumably are much lower because it is a pristine natural area that currently receives no significant surface water inflows from the upstream canal. Basic water quality information is simply missing.

Even with the limited data provided in the draft PIR, it is clear that there are serious concerns about the quality of water in the Wingate Mill Canal. The draft PIR indicates that average total phosphorus concentrations are in the range of 32-42 ppb. Draft PIR, at 6-62. The Florida Department of Environmental Protection ("FDEP") has determined that average phosphorus levels downstream should not exceed 13 ppb based on a formula that takes into account annual variability. *Id.* The draft PIR also indicates that phosphorus levels should be no higher than 17 ppb in the BCNP. Draft PIR, at 6-62. Excessive phosphorus concentrations cause imbalances in natural populations of flora and fauna that undermine the aquatic ecosystem. The Seminole Tribe obviously sees existing phosphorus levels as being a major problem, because at their request the TSP will block all flow from the Wingate Mill Canal to the West Feeder Canal. The TSP also is largely intended to stop further phosphorus-induced imbalances downstream and to remediate vegetation in areas that have received excessive nutrients in the past. Sending phosphorus-enriched water to natural Everglades marshes is undoubtedly a major problem and wholly inconsistent with the purpose of CERP to "restore, preserve and protect the South Florida ecosystem while providing for the other water-related needs of the region, including water supply and flood protection."

Yet, the draft PIR has no discussion of the environmental effects of sending phosphorus-enriched water for the first time into the Kissimmee Billie Strand in the Wingate Mill area. There is no discussion of how phosphorus levels would change there. There is no discussion of the assimilative capacity of that forested wetland. There is no discussion of how adding

phosphorus will change the natural flora, what changes might occur to the periphyton mat that is the base of the food chain, or how those changes will affect aquatic and terrestrial species. These deficiencies certainly merit further review.

There also is no discussion about whether the TSP will cause a violation of Florida water quality standards in this area. The Corps' Programmatic Regulations provide that a Project Implementation Report must "[c]omply ... with applicable water quality standards." 33 CFR § 385.26(a)(3)(iv). The draft PIR acknowledges that the narrative nutrient standard applies in the Wingate Mill area. Draft PIR, at 2-4. The narrative nutrient standard provides that "In no case shall nutrient concentrations of a body of water be altered so as to cause an imbalance in natural populations of aquatic flora and fauna." Fla. Admin. Code 62-302.530. The draft PIR identifies total phosphorus concentrations of 11-12 ppb as a "restoration target," which suggests that this is a numeric interpretation of the narrative standard in this area. See, e.g., Draft PIR, at 3-6, 3-8. The draft PIR also states that the FDEP has developed a "placeholder" phosphorus concentration in the BCNP of 17 ppb, which presumably also is some type of numeric interpretation of the narrative standard. Draft PIR, at 6-62. Regardless of whether 13 ppb or 17 ppb is the numeric interpretation of the narrative standard for the Wingate Mill area, it is clear that the TSP will cause a violation. According to the draft PIR, the Wingate Mill Canal has average phosphorus concentrations over 30 ppb. *Id.* at 6-62. The introduction of that water for the first time into the Kissimmee Billie Strand presumably would cause an imbalance in violation of the narrative nutrient standard.

Even worse, the TSP treats the Kissimmee Billie Strand in the Wingate Mill area as a *de facto* treatment area. The draft PIR explicitly acknowledges that part of its strategy to meet water quality standards downstream is to allow phosphorus to get trapped in the Kissimmee Billie Strand before it reaches the BCNP and Tribal lands downstream. Draft PIR, at ES-6, 3-26. The draft PIR states that "[a]s water is re-routed through this natural flow-way [Kissimmee Billie Strand in the Wingate Mill area], additional TP uptake is expected to further reducing [sic] TP loads by up to 45-50% before entering downstream BCNP, the Seminole Big Cypress Reservation, or other downstream areas as determined by the regulatory agencies." *Id.* at 6-63. This means, of course, that FDEP is assuming that phosphorus will be left behind in the Kissimmee Billie Strand along the way, where it will change this pristine ecosystem. See *id.* at 6-39 (referring to "increased nutrient loading" in areas downstream of the plugged Lard Can and Wingate Mill Canals). What is left unstated is that the Corps is simply moving the area of phosphorus enrichment from tribal lands further downstream into the Wingate Mill area.

It is shocking that the Corps and SFWMD would once again treat this pristine natural area as a dumping ground for water quality concerns. The goal of Everglades restoration is to protect and restore natural areas, not degrade them. We are unaware of any other place in South Florida where the agencies are seeking to provide water quality treatment by sending dirty water to a pristine natural area. Nevertheless, the draft PIR appears to assume that sacrificing water quality in the Kissimmee Billie Strand is acceptable because it is not owned by the Tribes or a government agency. That is just wrong. The Kissimmee Billie Strand is a significant natural feature that deserves the highest level of protection regardless of ownership.

The draft PIR does mention that upstream source controls may reduce phosphorus levels discharge into the Kissimmee Billie Strand, but the discussion is completely inadequate. There is no discussion of any specific source control and their likely environmental effects. The draft PIR does not identify where specifically in the upstream basin the phosphorus is coming from, how phosphorus levels could be reduced, and how source controls might affect the environment and long-standing agricultural activities. The cure may be worse than the disease,

so the PIR should discuss exactly what “source controls” might entail. We must be certain that any proposed plan prevents any condition that could lead to environmental degradation.

The draft PIR’s characterization of the source controls as “non-WERP features,” *e.g.*, Draft PIR, at ES-18, is no excuse for the lack of analysis. The Corps’ Programmatic Regulations require that a Project Implementation Report show that a project will “[c]omply ... with applicable water quality standards.” 33 CFR § 385.26(a)(3)(vi). If the Corps’ project does not include the features necessary to ensure compliance with water quality standards, then that violates the regulation.

National Environmental Policy Act (“NEPA”) regulations require agencies to analyze “connected actions” in a single environmental impact statement. 40 CFR § 1508.25(a)1). “Connected actions” are actions that are “closely related,” including those that “[c]annot or will not proceed unless other actions are taken previously or simultaneously,” and actions that “[a]re interdependent parts of a larger action and depend on the larger action for their justification.” *Id.* The source control measures are “connected actions” because they clearly are essential to WERP’s success and would be implemented specifically because of WERP. *E.g.*, Draft PIR, at 3-26. Even if the Corps does not want to be responsible for the costs of the source controls, it violates NEPA not to analyze them in the PIR.

There also is no indication that the source control measures will be effective at sufficiently reducing phosphorus levels. The draft PIR indicates that the efforts are already “underway,” and generally states that they consist of “enhanced water quality monitoring,” “increased data analysis and reporting,” “voluntary and cost share Best Management Practices improvements,” and “Environmental Resource Permit Compliance and Regulatory Strategy.” Draft PIR, at 2-7. If these source control efforts are already underway, and phosphorus concentrations remain three times higher than required, then it seems apparent that they are not solving the problem. This should be no surprise, because “monitoring” (taking samples) and “reporting” (issuing paper reports) do nothing to actually improve water quality in the real world. Moreover, the draft PIR does not identify what “Best Management Practices” are currently in place, what “improvements” will be implemented, how those “improvements” would reduce phosphorus levels, what “permits” are out of compliance, and what “regulatory strategy” will be developed. This kind of vague discussion inspires little confidence that existing source controls will have any meaningful effect.

We also question the ability of the SFWMD to impose additional source controls beyond those already implemented. The draft PIR states that the agency may “[p]lan, design and implement upstream water quality projects” and may initiate “[r]ulemaking for regulatory source control program.” Draft PIR, at 2-7. Nowhere does the document state what kind of projects would be designed and implemented, where they would be located, what legal authority the agency has to implement them, how they would be paid for, or any other information that would allow one to conclude that these projects actually will happen. The draft PIR also does not indicate how the SFWMD has rulemaking authority to impose additional requirements on agricultural activities that are implementing best management practices approved by the Florida Department of Agriculture and Consumer Services. See Fla. Stat. Section 403.067(7)(c)(3). Even if the SFWMD had authority and money to act, a promise that the agency will come up with a plan in the future is little comfort when the Corps is gambling with the ecological health of a pristine natural area. The pie-in-the-sky rhetoric in the draft PIR provides no assurances that the state will in fact reduce phosphorus concentrations to a level that would be protective of the Kissimmee Billie Strand.

The draft PIR needs a substantially improved analysis of water quality concerns before the Corps asks Congress to authorize these features of WERP.

II. The Draft PIR Does Not Adequately Analyze and Fails to Address the Effects of Increasing Water Levels in the Area Near the Wingate Mill Canal

The draft PIR also is deficient in its discussion of the effects of increasing water depths in the Wingate Mill area. We are concerned both regarding the effects on natural areas as well as effects on agricultural activities.

A. Effects of Increasing Water Depths in Natural Areas

As an initial matter, the draft PIR does not appear to disclose how much the TSP will deepen water levels in the Kissimmee Billie Strand and nearby natural areas in the vicinity of the Wingate Mill Canal. Looking at the document, we do not see where the Corps specifically identifies average water depths today, average water depths with the TSP, and how the TSP might increase maximum water levels in high water years. This is important, because history has shown that high water events in the Everglades can cause mass die-offs of wildlife such as deer if there is no high ground for animals to take refuge. If the TSP has the effect of eliminating the high ground in these events, there could be significant negative effects to flora and fauna. The public needs to know the details to assess the effects of the proposal.

The draft PIR relies on a hydrological model that estimates changes in water depths in different cells of a grid. The grid covers most of South Florida, so it has a gross scale. Each cell appears to cover several square miles, which means that in this part of South Florida a single cell necessarily includes very different types of areas. The Wingate Mill area is a mosaic of different types of natural areas, from cypress strands with deeper water to upland areas to transition areas in between, and all of these areas can be located within a short distance from one another. A cell in a computer model that includes different types of natural areas might show average water levels across the entire cell, but we question whether it can show changes in water depths in the different types of areas within the cell. For example, water will concentrate in areas of lower elevation, which could mean that average water depths in low spots could change more than the average water depth across the entire cell. This kind of gross scale model therefore provides little detailed information about how water levels will change.

Putting aside the scale of the model, there are other significant flaws to its use. The model was recently updated to add cells in the area covered by WERP, including the Wingate Mill area. It is our understanding that agency personnel have been candid that the model is not yet reliable in the newly added areas, and the SFWMD is currently issuing contracts so that the model can be refined to be more accurate. If the agencies are questioning the accuracy of the model, then it should not be used as the primary basis for estimating the hydrological effects of the TSP.

Any hydrological model also has to include assumptions about how water control structures are operated in order to estimate water depths and water flows in different conditions. The TSP has some critical unknowns regarding project operations, because it relies in part on indigenous knowledge of the Seminole and Miccosukee Tribes. See, e.g., Draft PIR at 6-27. The draft PIR states that “the gated structures included in the TSP that control surface water flow into the Native Area [will] be operated pursuant to indigenous knowledge (IK) as determined by the STOF to ensure that WERP provides environmental benefits in this area.” Draft PIR, at ES-9. This apparently means that the Seminole Tribe will be able to close the water control structures at the downstream end of the privately-owned portion of the Kissimmee

Billie Strand at the Tribe's sole determination based on undisclosed criteria. This means that the Corps does not even know the operational criteria to use in modeling the effects of the TSP, and the model cannot predict what is going to happen to water levels west of the Big Cypress Reservation.

We are astounded that the Corps and SFWMD would even consider giving an individual stakeholder control over a public project feature, especially when that stakeholder could use its control to benefit it at the possible expense of other stakeholders and the fragile environment. We are very concerned that in high water conditions, the Seminole Tribe could use this control to block water flow from the Kissimmee Billie Slough to the reservation and flood out the private property upstream. The Bergeron Everglades Foundation respects the rights of the Seminole and Miccosukee Tribes to manage their lands as they deem appropriate, but does not agree that they should be able control conditions on other property owners' lands or negatively affect the environment.

Even if the draft PIR accurately showed how much water levels will change in the Wingate Mill area, the document lacks detailed discussion of the effect of increasing water depths in these natural areas. The effects of increasing water depths in each type of area is different: strands may be able to handle greater water depths without significant ecological changes, while areas of higher elevation may be much more affected. We looked for information about how the TSP would change vegetative and wildlife communities in the specific natural areas between the Wingate Mill Canal and the Seminole Tribe's property, but could not find it in the draft PIR.

This is a concern for the Foundation because the Kissimmee Billie Strand in the Wingate Mill area has been cut off from surface water inflows for half a century. The upstream area also has received drainage from the West Feeder Canal, Wingate Mill Canal, and the Lard Can Canal, all of which have lowered water levels. This means that the plants and animals in the Kissimmee Billie Strand have been become used to lower water levels. Like it or not, the floral and faunal community has evolved to match the conditions that have existed there for decades. Suddenly increasing water levels in this area could have significant effects, such as causing a shift in the types and proportions of plants and animal species. The Corps should not make major changes to such an incomparable wonder as the Kissimmee Billie Strand without fully understanding and addressing those effects.

The reference to performance measures in the draft PIR is not enough. The performance measures are very generic and appeared to have been prepared by people who are focused primarily on areas further south, e.g., the BCNP. These performance measures simply assume that higher water levels are better than lower water levels, without any kind of distinction between the type of area affected or the absolute volume of water that may be present in location. This kind of gross-scale tool does not take into account how vegetative and faunal communities in this specific area may change as a result of increasing water depths.

The draft PIR, as written, does not provide the information needed to demonstrate that the TSP will cause more good than harm in the natural areas near the Wingate Mill Canal. Good faith attempts, suppositions and expectations cannot replace facts and knowledge when dealing with the future of our environment.

B. Flood Protection Effects on Agricultural Areas

We also are concerned about the effects of the TSP on flood protection in the West Feeder Basin. The draft PIR indicates that the TSP will increase water levels on agricultural

lands in West Feeder Canal Basin. See, e.g., Draft PIR, at 5-2 to 5-3, 5-18, 6-39. The draft PIR discussion of this issue is problematic.

The L-28 Interceptor and Feeder Canals are part of the Central and Southern Florida Project. Congress authorized those features not just to provide drainage to the Seminole Big Cypress Reservation, but also to provide drainage to nearby private lands. The 1963 design memorandum that is the basis of these features stated that “the area served by the Interceptor and Feeder Canals would include most of the western portion of the Big Cypress Seminole Indian Reservation, plus privately owned agricultural land lying north and west of the Indian Reservation.” Central and Southern Florida Project, Supplement 40 -- Detailed Design Memorandum for the Levee 28 Interceptor and Feeder Canals, page 3 (Aug. 23, 1963). This is not a small area: the design memorandum indicated that the drainage area served by the West Feeder Canal would cover 109 square miles.

The proposed TSP is inconsistent with this original Congressional authorization. The plan would redesign the West Feeder Canal in a manner so to serve the Seminole Tribe’s Big Cypress Reservation and nobody else. This means that the privately-owned properties west of the reservation will no longer be served by the project, and that the TSP will increase flooding on agricultural lands. The Corps cannot change a civil works project to no longer serve an original project purpose without authorization from Congress. *Environmental Defense Fund v. Alexander*, 467 F.Supp. 885, 899 (N.D. Miss. 1979). The Foundation is disappointed that nowhere in the draft PIR is there an acknowledgement that the Corps is abandoning an original project purpose, because this should be disclosed to Congress before asking for authorization of the WERP.

To the extent that the Corps is relying on the authority provided in WRDA 2000, the plan appears to violate that statute’s Savings Clause. The Savings Clause provides in relevant part:

“Maintenance of Flood Protection. – Implementation of the Plan shall not reduce levels of service for flood protection that are –

(i) in existence on the date of enactment of this Act; and

(ii) in accordance with applicable law.”

WRDA 2000, § 601(h)(5)(B). On its face, this language indicates that the Corps cannot implement a project under the authority of CERP that will reduce levels of service for flood protection. The Corps appears to believe that it can avoid compliance with the Savings Clause by taking property rights (such as fee title or flowage easements) through eminent domain. See, e.g., Draft PIR, at 6-75. Yet, nothing in the Savings Clause talks about eminent domain, and if the Corps could avoid a violation of the Savings Clause by simply taking private property, then the prohibition in the Savings Clause would be meaningless. The Foundation would understand if the Corps were to purchase properties from willing sellers on a voluntary basis, but the proposal to use eminent domain would seem to be inconsistent with the Savings Clause.

The draft PIR also is inconsistent with the Savings Clause in the way it analyzes compliance. The Corps’ Programmatic Regulations require the agency to conduct a Savings Clause analysis by “consider[ing] the operational conditions included in the pre-CERP baseline ... to demonstrate that the levels of service for flood protection ... will not be reduced by implementation of the project.” 33 CFR § 385.37(b). The “pre-CERP baseline” means “the hydrological conditions in the South Florida ecosystem on the date of enactment of WRDA 2000,” which was December 11, 2000. *Id.* § 385.3. The regulation governing Project Implementation Reports similarly requires that those reports “[d]etermine ... that implementation

of the selected alternative will not reduce levels of service for flood protection that ... [w]ere in existence on the date of enactment of section 601 of WRDA 2000." 33 CFR § 385.26(a)(3)(xi). The draft PIR does not do this. Instead of comparing flood protection with the TSP to levels of service that existed in 2000, the draft PIR compares it to existing levels of flood protection, i.e., those in existence in 2024. See Draft PIR, at Annex B-3. This is completely inconsistent with the regulations. The draft PIR justifies its approach by referring to a draft guidance memo from 2007, but we do not understand how a memo can change a regulation. The Foundation believes that the Corps should follow the regulation on its books, not a memo. Since the draft PIR did not contain a comprehensive analysis, the Corps cannot say whether or not it has complied with the Savings Clause.

III. Conclusion

Thank you for considering the comments of the Bergeron Everglades Foundation. Once again, the Foundation supports the project as a whole, and has no objection to the proposed features outside of Region 2. However, the Corps and SFWMD clearly need to do more work before finalizing any proposed features in the Feeder Basins, especially the Wingate Mill area in southern Hendry County. We look forward to continuing to engage with the agencies on this important project. As Alligator Ron always says, long live the Everglades!

Sincerely,