



# Everglades Coalition

1000 Friends of Florida  
Arthur R. Marshall Foundation  
Audubon of Florida  
Audubon of Southwest Florida  
Audubon Society of the Everglades  
Broward County Audubon Society  
Caloosahatche River Citizens  
Association  
Clean Water Action  
Clean Water Network  
Collier County Audubon Society  
The Conservancy of Southwest  
Florida  
Defenders of Wildlife  
Earthjustice  
Everglades Law Center  
The Environmental Coalition  
Everglades Coordinating Council  
Environment Florida  
Florida Defenders of the  
Environment  
Florida Division of the Izaak  
Walton League of America  
Florida Keys Chapter of the Izaak  
Walton League of America  
Florida Keys Environmental Fund  
Florida Native Plant Society  
Florida Oceanographic Society  
Florida Sierra Club  
Florida Wildlife Federation  
Friends of the Everglades  
Izaak Walton League of America  
Last Stand  
League of Woman Voters of Florida  
Loxahatchee River Coalition  
Mangrove Chapter of the Izaak  
Walton League of America  
Martin County Conservation  
Alliance  
National Audubon Society  
National Parks Conservation  
Association  
National Wildlife Federation  
Natural Resources Defense Council  
The Ocean Conservancy  
The Pegasus Foundation  
Sanibel-Captiva Conservation  
Foundation  
Save It Now, Glades!  
Sierra Club  
Sierra Club Broward Group  
Sierra Club Loxahatchee Group  
Sierra Club Miami Group  
Tropical Audubon Society  
The Urban Environment League  
World Wildlife Fund

March 18, 2008

Secretary Tom Pelham  
Florida Department of Community Affairs  
2555 Shumard Oak Boulevard,  
Tallahassee, FL 32399-2100

VIA FACSIMILE: 850-921-0781

Re: *Everglades Agricultural Area – Area of Critical State Concern*

Dear Secretary Pelham,

The Everglades Coalition is an alliance of 47 national, state, and local organizations who advocate for the restoration, protection and enhancement of the greater Everglades ecosystem. In recent years, the Coalition has corresponded with the Department of Community Affairs and local governments regarding development issues within the Everglades Agricultural Area (“EAA”). In 2004, the Coalition urged the Governor and Cabinet and the Department of Community Affairs to consider the EAA for designation as an Area of Critical State Concern. We write today to renew that request and to urge the Department of Community Affairs to recommend the immediate establishment of a Resource Management Planning Committee to identify problems and strategies for solutions for several issues affecting the EAA.

In the last twenty-four months, Palm Beach County has received applications to mine over 15,000 acres within the EAA. Due to the EAA’s critical location and the sensitivity of surrounding lands, uses such as mining have the potential to undermine restoration efforts and cause environmental harm. Large scale mines limit options for restoring flow from Lake Okeechobee to the Everglades, can result in seepage from nearby environmental or water management features, and can negatively impact water quality.

In order to provide sufficient water to the Everglades during drought and to reduce damaging high volume discharges to the estuaries, significantly more land than has been identified in the current Comprehensive Everglades Restoration Plan will be needed in the EAA for water storage, water quality treatment, and conveyance of water south to the Everglades and Florida Bay. Uncertainties associated with the ability of Aquifer Storage and Recovery – a key component of the restoration plan - to perform to anticipated levels, the need to treat water prior to storage, the high operations and maintenance costs associated

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with this technology, and the lack of available land for surface storage elsewhere underscore the need to maintain maximum flexibility for restoration alternatives within the EAA. This need, combined with the potential for mines to cause significant environmental effects makes it even more critical to undertake a comprehensive analysis to understand the system-wide effects of mining on the region.

Additional incompatible uses have recently been proposed or approved within the EAA. The Palm Beach County Solid Waste Authority has proposed to site a solid waste municipal landfill within the EAA, directly adjacent to the Arthur R. Marshall Loxahatchee National Wildlife Refuge. In response to significant concerns expressed by Refuge staff and the environmental community, the Solid Waste Authority has undertaken an evaluation of alternative sites, but has not committed to relocate this use. A second landfill proposal, to store residuals from the Florida Crystals Okeelanta Co-generation Plant was approved by the County in 2007.

Other proposals that merit a comprehensive evaluation of their impacts to the region include a proposal to establish an “Inland Port” and the expansion of the biofuel industry.

An additional critical consideration is the longstanding need to revitalize the Glades communities. In its 2004 Evaluation and Appraisal Report process, Palm Beach County recognized this need, as well as the importance of maintaining agriculture within the remainder of the EAA. To accomplish this goal, and in furtherance of the County’s Tier System, the EAR recommended division of the EAA into two tiers: a Glades Communities Tier - which would direct revitalization efforts to this region, and an Everglades Protection Tier – which would recognize the importance of the EAA to Everglades Restoration, while maintaining agricultural land uses. Unfortunately, these modifications to the County’s tier system, while recommended in the EAR process, were never adopted into the Comprehensive Plan.

Given both the importance of the EAA to Everglades Restoration, and the broad range of issues currently affecting this region, the EAA clearly meets the criteria for ACSC designation. Pursuant to Chapter 380, Florida Statutes, ACSC designation is appropriate for areas containing, or having a significant impact upon, environmental or natural resources of regional or statewide importance – such as in this case, the Everglades, and for areas having a significant impact upon, or being significantly impacted by, an existing or proposed major public facility or other area of major public investment, including water management projects, such as in this case, the CERP.

A necessary step, prior to concluding that ACSC designation is necessary or appropriate is the establishment of a Resource Planning Management Committee (“RPMC”). The establishment of this committee would provide a highly beneficial forum for the County, relevant state agencies, the regional planning council, the water management district and affected stakeholders to identify and seek solutions to resolve existing, and prevent future, problems which may endanger the resources in the area.

It is within the legislative authority of the Department of Community Affairs to recommend establishment of an RPMC to the Administration Commission. The Everglades Coalition urges the Department of Community Affairs to make this recommendation so that the issues raised by currently pending large scale mining proposals, other potentially incompatible land uses, Everglades Restoration needs, and the imperative to revitalize and provide support to the Glades communities can be comprehensively resolved. Additionally, we are very pleased to support your draft Everglades

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protection language dated March 4, 2008, and ask that you let us know how we can best help you in having the Legislature approve this important statutory addition as soon as possible.

Sincerely,



Drew Martin  
Co-Chair



Mark Perry  
Co-Chair

Cc: Governor Charlie Crist  
Secretary Mike Sole, FDEP  
Michael Busha, TCRPC  
Palm Beach County Board of County Commissioners