

## **Seminole Tribe of Florida Supports the Western Everglades Restoration Project**

The Seminole Tribe of Florida (Tribe) continues to support the Western Everglades Restoration Project as an opportunity to provide historical restoration of hydrology within the Big Cypress Reservation's sensitive natural areas targeting the southwestern portion of the reservation, known as the Native Area. The Seminole Tribe seeks action by the federal and state governments to address the decades-worth of collective harm to the Big Cypress Reservation in part caused by the Central and Southern Flood Control Project. The Western Everglades Restoration Project (WERP) provides an opportunity to provide the additional hydrology needed to restore these habitats. Specifically, the Tribe supports WERP Alternative H for the Tentatively Selected Plan (TSP) with a strong commitment for proper implementation of monitoring associated with an "Adaptive Management Plan."

The Seminole Tribe supports the following project features and approaches developed over 3+ years of Tribal consultation and stakeholder meetings:

**Wingate Mill STA:** The Tribe supports the plan to route surface water flows in natural areas/sloughs from the area northwest of the Reservation into the Wingate Mill STA. Once treated within the STA, the water would be released to sheetflow through cypress polishing cells to produce "cypress-ready" water. Water quality must be clearly shown to be equivalent to that in the Native Area before it will be allowed to be introduced into the Native Area. To address the water quality needs of the Native Area, the Tribe requests that through Adaptive Management, a five-year pre-project implementation monitoring program be completed and used to determine if these polished waters can be directed into the Native Area. If the Native Area water quality cannot be met, additional infrastructure may be necessary to divert water flows around the Reservation to the south.

**North Feeder Canal:** The Tribe supports plugging the North Feeder Canal at the north boundary of the Reservation. The planned North Feeder STA would treat the highly polluted North Feeder water and the treated water would be diverted into STA 5/6 and eventually into WCA 3A. In addition, if the L-28 Interceptor Canal is plugged/backfilled south of the Reservation border, additional flood control measures may be needed.

**Ecological Monitoring Plan:** The Tribe supports a community-based "species of significance" approach in order to broaden the ecological monitoring to include appropriate community-based species. We need to look at what supports the species through the food web. The intent of the analysis should be to develop healthy systems to support the community-based species.

**Adaptive Management:** As part of all the elements above and to be applied throughout the planning, design, construction, and operation of WERP, the Tribe supports the development and implementation of an "Adaptive Management Plan." Regarding the deliveries of water to the Tribe's Native Area, a five-year pre-project implementation monitoring program will be required to assure protection of the Native Area.

**Standard CERP Constraints:** Specifically, the Tribe is concerned about maintaining flood control on the Big Cypress Reservation, including in the Hunting Adventures. And the Tribe wants to clarify that any water received on the Reservation for restoration will not be considered as part of the Tribe's Entitlement allocation. The Seminole Tribe's Tribal Historic Preservation Office (THPO) office does not have sufficiently detailed information regarding neither the boundaries of the projected Area of Potential Effect (APE), nor the types of effects and disturbance the project will produce. Both of these are necessary before the THPO can effectively consult on possible project impacts to on- and off-reservation cultural resources associated with WERP. As the project progresses, USACE should initiate efforts to survey and identify any cultural resources that may be affected by this undertaking.