

**Natural Resources Defense Council • Conservancy of Southwest Florida • National Parks
Conservation Association • Center for Biological Diversity**

February 3, 2021

Noah Valenstein, Secretary
Florida Department of Environmental Protection
Via electronic mail to: noah.valenstein@dep.state.fl.us

RE: Burnett Oil Company, Inc.'s Section 404 Clean Water Act/Environmental Resource Permit application nos. 323836-004 and 397879-002 to facilitate new oil drilling in the Big Cypress National Preserve and public records request under Chapter 119, Florida Statutes

Dear Secretary Valenstein,

The undersigned organizations have repeatedly written to the Department and the National Park Service, most recently on December 16, 2020, regarding our opposition to Phase I geophysical oil exploration for the Nobles Grade 3-D Geophysical Seismic Survey in the Big Cypress National Preserve (Preserve) by the Burnett Oil Company, and its failure to adhere to existing permit conditions and fully reclaim and properly monitor the related damage. We now write to express our opposition to the Department's issuance of permits under Section 404 of the Clean Water Act and Part IV of Chapter 373, Florida Statutes, or any other permits, that would authorize or facilitate new oil exploration or drilling in the Preserve.

On December 22, 2020, the Environmental Protection Agency (EPA) published in the Federal Register notice of its approval of the state of Florida's application to assume jurisdiction over the Clean Water Act's Section 404 permitting program.¹ Conservation organizations are challenging the EPA's actions in *Center for Biological Diversity v. U.S. Environmental Protection Agency*, Case No.: 21-cv-119 (D.D.C. January 14, 2021). Public comments submitted in opposition to the Department's request to assume this program highlighted concerns regarding the unlawfulness of the proposed program and the lack of analyses, consultation, and public disclosures that would normally occur under federal law, including the Clean Water Act (CWA), National Environmental Policy Act (NEPA), Endangered Species Act (ESA), and National Historic Preservation Act (NHPA).

We recently became aware of state 404 application nos. 323836-004 and 397879-002, submitted on January 22, 2021, by the Burnett Oil Company to the Department, for Section 404 Clean Water Act and Environmental Resource Permit authorization to construct oil well pads and access roads in wetlands in two new locations in the Big Cypress National Preserve. The undersigned organizations did not receive notice of any permit applications from the Department despite repeatedly requesting such notice in prior correspondence. We became aware of these permit applications as a result of an exploratory search of the Department's new Section 404 permit

¹ 85 Fed. Reg. 83,553 (Dec. 22, 2020).

program database. The website itself lists no public notices regarding any Section 404 permit. This lack of transparency is concerning and serves as an example of inadequate public notice under the state Section 404 permit program.

It is also unclear whether Burnett Oil has applied for a permit under Chapter 377, Florida Statutes, and we request clarity from the Department on this, as well as the status of obligations under the Endangered Species Act regarding the effects these activities will have on endangered and threatened species, including the Florida panther and Florida bonneted bat, and their critical habitats in the Preserve.

Existing Damage Caused by Oil Exploration in the Preserve Remains

As stated most recently in our December 16, 2020 letter, and, in other prior correspondence, we continue to have concerns about the success of the reclamation Burnett Oil has attempted thus far to reclaim the wetland damage caused by its seismic activities in the Preserve in 2017 and 2018, and the lack of compensatory mitigation for the loss of wetland function and endangered Florida panther habitat. Specifically, numerous issues remain with the oil company's monitoring of and reporting on the reclamation, and compensatory mitigation remains incomplete as of the date of this letter. We have shared numerous reports² written by our environmental consultants at Quest Ecology, Inc. Most recently, Quest Ecology reviewed the 2020 Reclamation Monitoring Report (dated October 2020) prepared by Turrell, Hall and Associates, Inc. on behalf of Burnett Oil and Quest Ecology continues to identify issues with the reclamation monitoring. To date, we have not received a response regarding the issues with Burnett Oil Company's monitoring raised by Quest Ecology.

The following is a summary of the damage to the Preserve caused by Burnett Oil Company's Phase I seismic survey, as documented by Quest Ecology:³

- Wetland soils were severely altered due to rutting and compaction caused by vibroseis and other off-road vehicles driving over them and then re-disturbed by subsequent reclamation attempts. The 33-ton vibroseis vehicles compacted and deeply rutted soils due to their sheer weight. The soils ruts created were almost 2-feet deep and up to 15-feet wide in places;

² See Quest Ecology, *Comments on Turrell, Hall and Associates, Inc.'s 2020 Reclamation Monitoring Report – October 20th, 2020 Burnett Oil Company's Nobles Grade 3-D Seismic Oil and Gas Exploration in the Big Cypress National Preserve* (December 15, 2020), available at: <https://www.nrdc.org/sites/default/files/quest-comments-monitoring-report-20201215.pdf>; Quest Ecology, *Summary of March 6, 2020 Site Assessment within Burnett Oil Company's Nobles Grade 3-D Seismic Oil and Gas Exploration area, Big Cypress National Preserve, Collier County, Florida* (March 15, 2020), available at: <https://www.nrdc.org/sites/default/files/final-quest-ecology-memorandum-20200306.pdf>; Quest Ecology, *Comments on Turrell, Hall & Associates, Inc.'s 2019 Reclamation Monitoring Report – August 30th, 2019 Burnett Oil Company's Nobles Grade 3-D Seismic Oil and Gas Exploration in the Big Cypress National Preserve* (January 3, 2020), available at: <https://www.nrdc.org/sites/default/files/quest-ecology-memorandum-2019-reclamation-monitoring-report-01032020.pdf>; Quest Ecology, *Seismic Survey Inspection Report, Big Cypress National Preserve* (June 2019), available at: <https://www.nrdc.org/sites/default/files/seismic-survey-inspection-report-20190615.pdf>; Quest Ecology, *Phase I Seismic Survey Inspection Report, Big Cypress National Preserve* (May 2018), available at: https://assets.nrdc.org/sites/default/files/seismic-survey-inspection-big-cypress-20180531.pdf?_ga=2.61695279.2044034844.1586532000-1336211018.1533580820.

³ *Id.*

- Despite their small size, dwarf cypress trees can range in age from 31 to 2,500 years. These trees provide important roosting sites and refuge from high water levels for birds and other wildlife. Nonetheless, dwarf cypress trees were cut or run over to make way for the vibroseis vehicles. Plant species and abundance within the representative seismic line inspected is significantly different from adjacent habitats not directly impacted by seismic survey activities—for example, dwarf cypress trees were observed in less than 1% of the seismic line, whereas these trees make up 50% of the plant cover in adjacent undisturbed habitats;
- Average total groundcover was around 5-10% within the seismic line inspected, as opposed to 40-60% in adjacent undisturbed habitats;
- Trees, shrubs, herbaceous species, and epiphytes (primarily consisting of Florida butterfly orchids and State-listed bromeliad species) were conspicuously absent within the seismic survey line observed compared to adjacent undisturbed habitats;⁴
- Dwarf pond cypress tree stumps that were cut with chainsaws by oil company crews—many exceeding two feet in diameter—were abundantly observed in the seismic line inspected and were not re-sprouting;
- Desiccation (drying out) of bromeliads and Florida butterfly orchids on the edges of the seismic lines due to removal of the adjacent dwarf cypress tree canopy important for maintaining temperature and moisture levels;
- Dwarf pond cypress tree seedlings were rarely observed in the seismic line inspected, although they were frequently observed in adjacent undisturbed habitats;
- The extent of torpedograss, a Category I invasive plant species in Florida, appear to have increased since the seismic survey activities began;
- Two native, but potentially nuisance plant species with the potential to spread once established—common reed and Carolina willow—were observed within the seismic survey line observed, suggesting that conditions are favorable for their continued growth and spread into other parts of the Preserve;
- Periphyton cover was significantly reduced within the seismic line observed compared to adjacent undisturbed habitats—periphyton is a critical component of the food web because it provides the primary food source for small consumers such as fish and invertebrates; and
- The oil company’s initial reclamation attempts of ground elevations impacted by vibroseis vehicles resulted in a difference of up to seven inches in some locations—the differences in ground elevations will have adverse effects on the natural recruitment of desirable native plants.

Despite Burnett Oil Company’s initial reclamation attempts, damage remains. Further, Quest Ecology identified problems with the representations made in the oil company’s initial monitoring report, many of which still remain, according to a second monitoring report, including:⁵

⁴ Notably, “reclamation” requirements include re-grading the soil ruts, but not the replanting of cypress trees or other destroyed or damaged vegetation. Vegetation is supposed to naturally recruit on its own.

⁵ Quest Ecology, *Comments on Turrell, Hall & Associates, Inc.’s 2019 Reclamation Monitoring Report – August 30th, 2019 Burnett Oil Company’s Nobles Grade 3-D Seismic Oil and Gas Exploration in the Big Cypress National Preserve* (January 3, 2020), available at: <https://www.nrdc.org/sites/default/files/quest-ecology-memorandum-2019-reclamation-monitoring-report-01032020.pdf>.

- The oil company is re-grading soils within 3 inches of adjacent undisturbed areas in places, as opposed to re-grading soil ruts to match original grade, as required by federal and state permits. Meaning, the Preserve is not the same as it was prior to the seismic testing, despite the oil company’s claims that there would be no long-term impacts;
- The number of monitoring stations within each designated reclamation area is not proportional to the length of the impacts caused by the oil exploration;
- The number and size of disturbed vegetation monitoring plots are insufficient to yield statistically significant results and do not include the full width of the seismic lines the oil company created;
- It’s unclear whether state and federal agencies will base the “success of the reclamation” on individual reclamation areas or the 110-square mile Phase I seismic survey area in its entirety;
- The center of the seismic line is the least disturbed area because it was located between the vibroseis vehicle tires, yet the disturbed vegetation monitoring is taking place there;
- The method for comparing the topographic elevations of adjacent undisturbed areas to reclaimed areas is “biased and inconsistent” with the oil company’s permits;
- Fundamental plant community attributes—such as species richness and diversity—between impacted and adjacent, undisturbed areas are not being disclosed; and
- Plant species are misidentified.

It is important for Burnett Oil Company to get the monitoring of the reclamation right from the start. Otherwise, subsequent years of monitoring will not be effective in identifying problems with the oil company’s reclamation attempts so they can be promptly corrected. In short, despite the oil company’s claims to the contrary, our scientific experts continue to conclude that long-term soil, hydrologic, and vegetation damage will persist as a result of Burnett Oil Company’s seismic survey activities.⁶

Impacts from Proposed Oil Development Must Not be Piecemealed

In addition to exploration, oil development (drilling and related infrastructure) can have long-lasting impacts. However, it appears that Burnett Oil Company may be piecemealing its permit applications to avoid analyzing and disclosing to the public the secondary and cumulative impacts of the forthcoming oil development, including drilling and any well stimulation techniques, such as hydraulic fracturing or acidizing. It appears from a review of the Department’s Section 404 permitting database that Burnett Oil Company is applying for authorization to fill wetlands to construct oil well pads and access roads at two new locations in the Preserve. However, we have not seen any related oil and gas permit applications submitted to the Department, or any federal access permits submitted to the National Park Service, to authorize oil drilling or other development, as of the date of this letter. Therefore, it appears that Burnett Oil Company is seeking authorization for direct wetland impacts associated with preemptive oil drilling activities (filling of wetlands to construct well pads and access roads), without disclosing the full impacts associated with oil development, including secondary and cumulative impacts. This approach thwarts

⁶ Quest Ecology, *Comments on Turrell, Hall and Associates, Inc.’s 2020 Reclamation Monitoring Report –October 20th, 2020 Burnett Oil Company’s Nobles Grade 3-D Seismic Oil and Gas Exploration in the Big Cypress National Preserve* (December 15, 2020), available at: <https://www.nrdc.org/sites/default/files/quest-comments-monitoring-report-20201215.pdf>.

informed and transparent environmental review and fails to provide the Department with the reasonable assurances required to issue permits for these activities. Impacts associated with oil development that can occur and must be analyzed here are as follows:⁷

A. Upstream (Well) Development Activities

- Development activities, including those associated with access roads, staging areas, seismic operations, as well as geophysical exploration including surveying/staking, land/tree clearing, explosives use, boring and vehicle traffic.
- Well field development activities, including those associated with production wells, well pads, drilling rigs, pump/well heads, reserve pits, storage tanks, fuel tanks, water tanks, electric equipment, drilling pipe storage, water wells, waterlines, surface water intakes, disposal wells, water impoundments, borrow pits, reserve pits, electric distribution lines, communication towers.
- Construction activities associated with well pads and ancillary features and onsite components, including but not limited to surveying/staking, land/tree clearing, grading, stormwater and erosion and sediment control infrastructure, wetland, stream and sensitive area mitigation/protection, trenching/boring, surface water pumping, spoil/debris, vegetation piles, vehicle traffic, drilling/well pad development and completion activities, office, control, utility, storage and maintenance structures incidental to specific projects.
- Production and operations activities, including those related to access roads, production, gas flaring, vehicle traffic, post-construction stormwater management, maintenance of well pads and ancillary features and components (including supporting infrastructure installation, repair and replacement, equipment upgrades, inspections and repairs, workovers and recompletions, minor amounts of soil disturbance, vegetation maintenance, road maintenance, etc.).
- Decommissioning and reclamation activities, including those associated with vehicle traffic, land/tree clearing, land excavation/backfilling, vegetation restoration and well plugging.

B. Midstream (Pipeline) Development Activities

- Construction of gathering, transmission and distribution pipelines and associated activities, including but not limited to access roads, staging areas, pipe storage/laydown areas, stream and water crossings, road borings, surveying/staking, land/tree clearing, stormwater and erosion and sediment controls, grading, trenching/boring, stockpiles, pipeline assembly, trench backfilling, vehicle traffic, revegetation and reclamation of surface impacts.
- Construction of surface features, including but not limited to access roads, staging areas and storage yards, booster, compressor and pump stations and related facilities, meter stations, mainline valves, pig launcher/receiver facilities, regular facilities, facilities to process, refine, stabilize and store natural gas and/or other hydrocarbons, communication towers, electric distribution lines, electric substations, capacitor stations, transformer

⁷ See U.S. Fish and Wildlife Service, *Oil & Gas Coalition Multi-State Habitat Conservation Plan*, https://www.fws.gov/northeast/PDF/OG_HCP_EIS_FAQs.pdf.

stations, office/control/utility/storage/maintenance structures incidental to specific projects, parking areas, cathodic protection, storage tanks.

- Operation and maintenance of pipeline and surface facilities, including but not limited to vehicle traffic, equipment upgrades, inspections and repairs/replacements, leak detection, pigging, painting, minor amounts of soil disturbance, vegetation maintenance to preserve the ROW [right-of-way], road maintenance, and odorization.
- Installation of new culverts/ditches, gas flaring, blow downs, and hydrostatic testing and discharge.
- Decommissioning and reclamation of pipeline and surface facilities, including but not limited to vehicle traffic, land excavation/backfilling, and vegetative restoration.

For example, as the photograph below shows, existing oil pads and associated roads in Big Cypress National Preserve are clearly visible in the landscape.



An oil pad and road near Raccoon Point in the Big Cypress National Preserve (January 2019)
Photo credit: Jonathan Milne, LightHawk

C. *Greenhouse Gas Emissions from Oil Development, including Downstream Activities, and Climate Change*

- A large and growing body of scientific research demonstrates, with ever increasing confidence, that climate change is occurring and is caused by emissions of greenhouse gases (GHGs) from human activities, primarily the use of fossil fuels. The 2018 Intergovernmental Panel on Climate Change (IPCC) Special Report on Global Warming of 1.5°C found that human activities are estimated to have caused approximately 1.0°C of global warming above pre-industrial levels, and that warming is likely to reach 1.5°C between 2030 and 2052 if it continues to increase at the current rate.⁸
- The 2018 United States Fourth National Climate Assessment found (NCA4), “that the evidence of human-caused climate change is overwhelming and continues to strengthen, that the impacts of climate change are intensifying across the country, and that climate-related threats to Americans’ physical, social, and economic well-being are rising.”⁹ Like the IPCC, the authors of NCA4 found that impacts are already occurring, concluding that “[t]he impacts of global climate change are already being felt in the United States and are projected to intensify in the future—but the severity of future impacts will depend largely on actions taken to reduce GHG emissions and to adapt to the changes that will occur.”¹⁰
- Both the IPCC and National Climate Assessment, respectively, acknowledge the role of fossil fuels in driving climate change.¹¹¹²
- Research shows that fossil fuels produced from U.S. federal lands are already a significant source of GHG emissions and that together, coal, oil, and natural gas produced on federal lands account for approximately 25 percent of the total fossil fuels produced annually in the United States.¹³
- Federal lands are also a critical carbon sink. The U.S. Geological Survey (USGS) found that in 2014, federal lands of the conterminous United States stored an estimated 83,600 MMT CO₂ Eq., in soils (63 percent), live vegetation (26 percent), and dead organic matter (10 percent).⁷⁹ In addition, the USGS estimated that Federal lands “sequestered an average of 195 MMT CO₂ Eq./yr between 2005 and 2014, offsetting approximately 15 percent of the CO₂ emissions resulting from the extraction of fossil fuels on Federal lands and their end-use combustion.”¹⁴ Here, surface disturbing activities from the oil development will likely reduce the Preserve lands carbon sequestration ability.

⁸ 2018 Intergovernmental Panel on Climate Change, *Summary for Policymakers, in Global Warming of 1.5°C: An IPCC Special Report on the Impacts of Global Warming of 1.5°C Above Pre-industrial Levels and Related Global Greenhouse Gas Emission Pathways, in the Context of Strengthening the Global Response to the Threat of Climate Change, Sustainable Development, and Efforts to Eradicate Poverty* 6 (Valérie Masson-Delmotte et al. eds., 2018) (attached) [hereinafter, *Summary of IPCC 1.5°C Report*].

⁹ U.S. Global Change Research Program, *Fourth National Climate Assessment: Volume II Impacts, Risks, and Adaptation in the United States* 36 (David Reidmiller et al. eds. 2018)[hereinafter, *NCA4*].

¹⁰ *Id.* at 32.

¹¹ 2014 Intergovernmental Panel on Climate Change, *Climate Change 2014 Synthesis Report: Contribution of Working Groups I, II, and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change* 46 (Rajendra K. Pachauri et al. eds. 2015) [hereinafter, *AR5*].

¹² *NCA4* at 76.

¹³ Matthew D. Merrill, et al., *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14: U.S. Geological Survey Scientific Investigations Report 2018-5131 6* (2018)[hereinafter, *USGS 2018 Report*].

¹⁴ *Id.* at 1.

- The Biden-Harris Administration recently issued an executive order acknowledging the climate crisis and the potential climate and other impacts associated with oil and gas activities on public lands,¹⁵ and a memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships.¹⁶
- The emissions associated with the production of fossil fuels from federal lands can be divided into two categories: (1) direct emissions associated with activities such as construction, drilling, completion, and well operation; and (2) indirect or “downstream” emissions associated with activities such as transportation, processing and end use of those fuels. Since direct emissions from production represent only a small proportion of the life cycle emissions from fossil fuels, agencies must analyze and disclose to the public both the direct and indirect effects for the entire supply chain. This includes emissions from exploration, development, drilling, completion (including hydraulic fracturing), production, gathering, boosting, processing, transportation, transmission, storage, distribution, refining, and end use.
- End uses of fossil fuels include combustion, which is the largest source of energy-related GHG emissions.¹⁷ Other end uses may result in oil or gas being used as a feedstock to create other products rather than being combusted. The creation and use of such products may also result in GHG emissions, and those emissions could be greater or lesser than the GHG emissions caused by combustion.

All of the aforementioned impacts must be analyzed and disclosed together, rather than in a piecemeal fashion.

Formal Government-to-Government Tribal Consultation is Required

Additionally, we understand that the areas of the Preserve encompassed in Burnett Oil Company’s new permit applications contain identified archaeological and culturally sensitive sites, and that the Miccosukee Tribe of Indians of Florida opposes these permit applications and have requested formal consultation. Formal consultation must also be initiated with the Seminole Tribe of Florida. We oppose any permit applications that adversely impact cultural and archaeological resources or impact the spiritual and cultural traditions of Native American tribes or interfere with sacred landscapes of indigenous peoples.

Public Records Request under Chapter 119, Florida Statutes

Finally, we found it difficult to locate and view all of Burnett Oil Company’s permit application materials on the Department’s state 404 permit MapViewer website and we could not locate any related documents through a project-specific search on the Department’s Oculus database, even though the 404 web page directs the public that files are available there. The documents we were

¹⁵ The White House, *Executive Order on Tackling the Climate Crisis at Home and Abroad* (January 27, 2021), <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>.

¹⁶ The White House, *Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships* (January 26, 2021), <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/26/memorandum-on-tribal-consultation-and-strengthening-nation-to-nation-relationships/>.

¹⁷ See Bureau of Land Management, *Supplemental Analysis for Greenhouse Gas Emissions Related to Oil and Gas Leasing in Utah*, DOI-BLM-UT-0000-2021-0001-EA (Oct. 2020) at 27.

able to locate thus far include the following: NPDES Discharge Control Plans and Details; Section A: General Information for All Activities; Tamiami Prospect; ERP/State 404 Environmental Supplement; and Stormwater Management System Engineering Supplemental Report. We request that the Department treat this as a public records request under Chapter 119, Florida Statutes, seeking any other records¹⁸ related to Burnett Oil Company's Section 404 and Environmental Resource Permit applications, including any correspondence with the Department. If these documents are readily available online, please advise. Please also contact the undersigned before doing anything that would cause the related costs or fees to exceed \$150.00.

Conclusion and Formal Meeting and Notice Request

Based on the foregoing, we fail to understand how Burnett Oil Company can demonstrate compliance with state and federal laws for issuance of the requested Section 404 Clean Water Act and Environmental Resource Permits. Therefore, we renew our request for a "time out" on further seismic, filling, drilling, or other related activities so that the Department, in consultation with the National Park Service, U.S. Fish and Wildlife Service, and Tribal governments can: (1) fully assess the existing damage caused by Burnett Oil Company's seismic testing and require completion of scientifically-based reclamation, monitoring, and compensatory mitigation for the damage that has already occurred; (2) request additional information on the secondary and cumulative impacts associated with new oil development; (3) analyze and disclose this information to the public and Tribal governments; (4) ensure Endangered Species Act obligations will be met; (5) engage in consultation under the National Historic Preservation Act; and (6) engage in meaningful government-to-government Tribal consultation. This is necessary for the Department to evaluate the full picture of the environmental damage already caused by Burnett Oil Company, and to analyze and disclose to the public whether the company can provide scientifically supported reasonable assurances to meet all applicable permit criteria for its proposed oil development activities.

We will continue to attempt to work with state and federal agencies to protect America's first National Preserve, which provides immeasurable values to the Everglades, Tribal and other frontline communities, public water supplies, tourism, wildlife, and the economy.¹⁹ To this end, we respectfully request a meeting with you to further discuss our grave concerns with the adverse impacts that have already occurred to Preserve resources as a result of oil exploration, and the additional adverse impacts that would likely occur if Section 404 and Environmental Resource Permits are issued allowing more oil development. We will also submit detailed comments once

¹⁸ "Records" means anything denoted by the use of that word or its singular form in the text of the Freedom of Information Act and includes correspondence, minutes of meetings, memoranda, notes, emails, notices, facsimiles, charts, tables, electronic data, Geographic Information Systems (GIS) data and shape files, aerial imagery and photography, data contained within cell phone applications, video footage, presentations, orders, filings, and other writings (handwritten, typed, electronic, or otherwise produced, reproduced, or stored). This request seeks responsive records in the custody of any Department office.

¹⁹ Frank Ackerman, Ph.D., Synapse Energy Economics, *Why Drill for Oil in Florida? Tiny Industry, Huge Risks* (2018), available at: https://www.nrdc.org/sites/default/files/why-drill-for-oil-in-florida-tiny-industry-huge-risks_2018-10-22.pdf.

we have had a chance to review all of Burnett Oil Company's permit application materials and any documents responsive to our public records request.²⁰

Finally, we request Department notification of all activity on the pending permit applications and renew our requests for the Department to notify us of any public notices and/or notices of intent to issue any Department permits to Burnett Oil Company. Please do not hesitate to contact us if you have any questions. Thank you in advance for your consideration.

Sincerely,

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²⁰ NRDC also has three outstanding Freedom of Information Act Requests from 2017 and 2018 pending with the National Park Service that have not been fulfilled.

cc:

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Stan Austin, Southeast Regional Director, U.S. Department of the Interior
Shannon Estenoz, Principal Deputy Assistant Secretary, U.S. Department of the Interior
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