



*The mission of the Florida Native Plant Society is to promote the preservation, conservation, and restoration of the native plants and native plant communities of Florida.*

February 14, 2011

Cheri Ehrhardt, Natural Resource Planner  
United States Fish and Wildlife Service  
Everglades Headwaters Proposal  
Post Office Box 2683  
Titusville, Florida 32781-2683

Subject: FNPS Support for Everglades Headwaters NWR and Perpetual Easements

Dear Ms Ehrhardt:

The Florida Native Plant Society (Society) wishes to express its enthusiastic support for the proposal to establish an Everglades Headwaters National Wildlife Refuge (Refuge) in the upper Kissimmee River watershed, inclusive of the proposal to conserve additional lands through the purchase of conservation easements.

In order to effectively conserve the native plants and native plant communities of Florida, we must conserve places where the natural processes that shaped and sustained them can be perpetuated. The Refuge proposal embraces the kind of holistic, integrated, landscape-scale approach that is required to achieve such an outcome. The protection of these lands, in combination with the hydrologic restoration envisioned in the Preliminary Project Proposal, will produce benefits that extend well beyond the footprint of the Refuge and complement the goals of the Comprehensive Everglades Restoration Plan.

Our support for the proposal is not without qualifications. We believe the lands protected through this proposal should be contiguous with existing conservation lands in the Upper Kissimmee to the greatest extent possible to fill gaps within the existing network and maximize long-term habitat values of the Refuge. The Society is also opposed to non-permanent forms of protection, such as the use of leases, payments for ecosystem services, and any other non-perpetual vehicles for land conservation. The only alternative to a fee-title purchase of ownership that should be considered during implementation of this proposal is permanent conservation easements.

We appreciate the opportunity to comment on the merits of the new Refuge. Please keep the Society informed as this proposal progresses and let us know if there is anything we can do to support the Service in this ambitious endeavor.

Respectfully,

Ann Redmond, President  
Florida Native Plant Society

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