



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.

June 7, 2010

Donald J. Quincey, Jr., Chairman
Suwannee River Water Management District
9225 County Road 49
Live Oak, Florida 32060

Subject: FNPS Objection to Proposed Surplus of Conservation Land by SRWMD

Dear Chairman Quincey:

The Florida Native Plant Society believes that an agency like the Suwannee River Water Management District (District) must have the ability to sell as surplus any lands it acquires that do not provide significant public benefit or harbor significant conservation value. However, the proposal currently under consideration by the District to sell as surplus approximately 279.62 acres of land is ill-conceived and the Society hereby asks that the proposal be rejected by the Governing Board at its meeting of June 8.

The attached maps (Figure 1-11) depict various spatial datasets that were developed by and for the state of Florida to support assessments of general and site-specific conservation value. They demonstrate convincingly that the great majority of the lands you are considering for surplus have significant conservation value that has either been overlooked or underestimated:

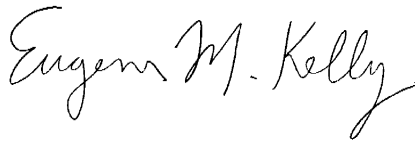
- 1) The Hunter Creek parcels have a combined land area of 120 acres and are contiguous with other conservation lands held by the SRWMD, including the extensive Bay Creek Conservation Area. These factors alone confer a value to wildlife that is sufficient to merit retention in public ownership. That value is corroborated by scores from the Florida Fish and Wildlife Conservation Commission's (FWC) Integrated Wildlife Habitat Ranking System data (Figure 1). However, the broader importance of these lands for conservation, including especially the maintenance of landscape connectivity, is confirmed in Figures 2 and 3, which depict the property's high Ecological Greenway ranking and its distinction as a CLIP Priority 1 site.
- 2) The 110-acre Santa Fe Oasis parcel maintains direct physical connectivity between the District-held Ichetucknee Conservation Area to the north and the FWC's Ft. White Wildlife and Environmental Area to the south. For this reason alone it should be retained in public ownership. However, it also scores high for habitat value, recharge value, and CLIP priority (Figures 4-6). We believe the District's analysis underestimates the importance of the property to both recharge and spring protection. The District's approach to gauging the property's

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- importance to spring protection depends on delineating a simple buffer around springs, which is inadequate because the quality of a spring's discharge is linked to recharge across the entire springshed. There are at least 5 springs within a 1-mile distance of the Santa Fe Oasis (Figure 5), making it likely the property is within the springshed of one or more of these springs.
- 3) The 42-acre Steinhatchee Rise parcel, which is contiguous with the District's Lower Steinhatchee Conservation Area, is identified as an Ecological Greenway Priority 2 Critical Parcel (Figure 7) and receives the highest possible CLIP aggregate ranking (Figure 8). The surplus of this parcel would also complicate the District's management of the remaining Lower Steinhatchee Conservation Area.
 - 4) Although the small size and disjunct location of some of the Falmouth North parcels suggests they should be evaluated for potential designation and sale as surplus, they also have significant habitat, recharge, and aggregate environmental values (Figures 9-11). We are not convinced by the District's report that these values have been evaluated appropriately and request that additional analysis be conducted, and/or additional justification be provided.

In summary, the Society is disturbed by the inadequate analysis that has been conducted to justify the sale of these lands based on the clear value of these lands for conservation and ask that the Governing Board deny the staff's recommendation that the lands be sold as surplus. Thank you for considering our concerns.

Respectfully,



Eugene M. Kelly, Policy Chair
Florida Native Plant Society

cc: Michael Sole, Secretary of the Department of Environmental Protection
David Still, SRWMD Executive Director
Joe Flanagan, SRWMD Director of Land Acquisition and Management
Charles Pattison, President, 1000 Friends of Florida
Manley Fuller, President, Florida Wildlife Federation

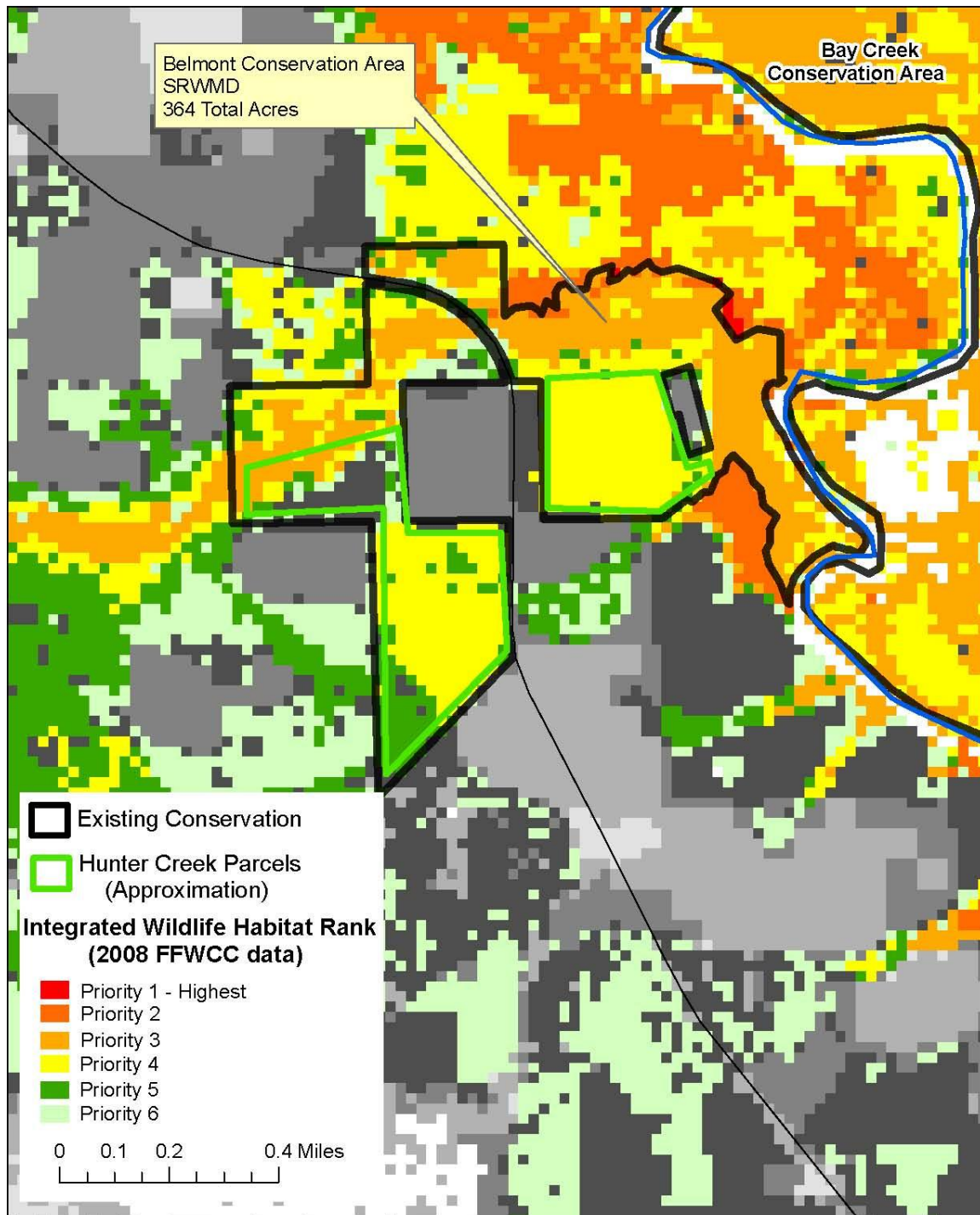


Figure 1. Integrated Wildlife Habitat Ranking System data for the Hunter Creek parcels. Data were developed by the Florida Fish and Wildlife Conservation Commission (FWC) and updated in 2008 to help state and regional agencies identify lands with significant wildlife habitat values. Only the 6 highest of 10 different priority levels are depicted in this map. Data distinguishing the location of existing conservation lands was downloaded from the Florida Natural Areas Inventory website (fnai.org).

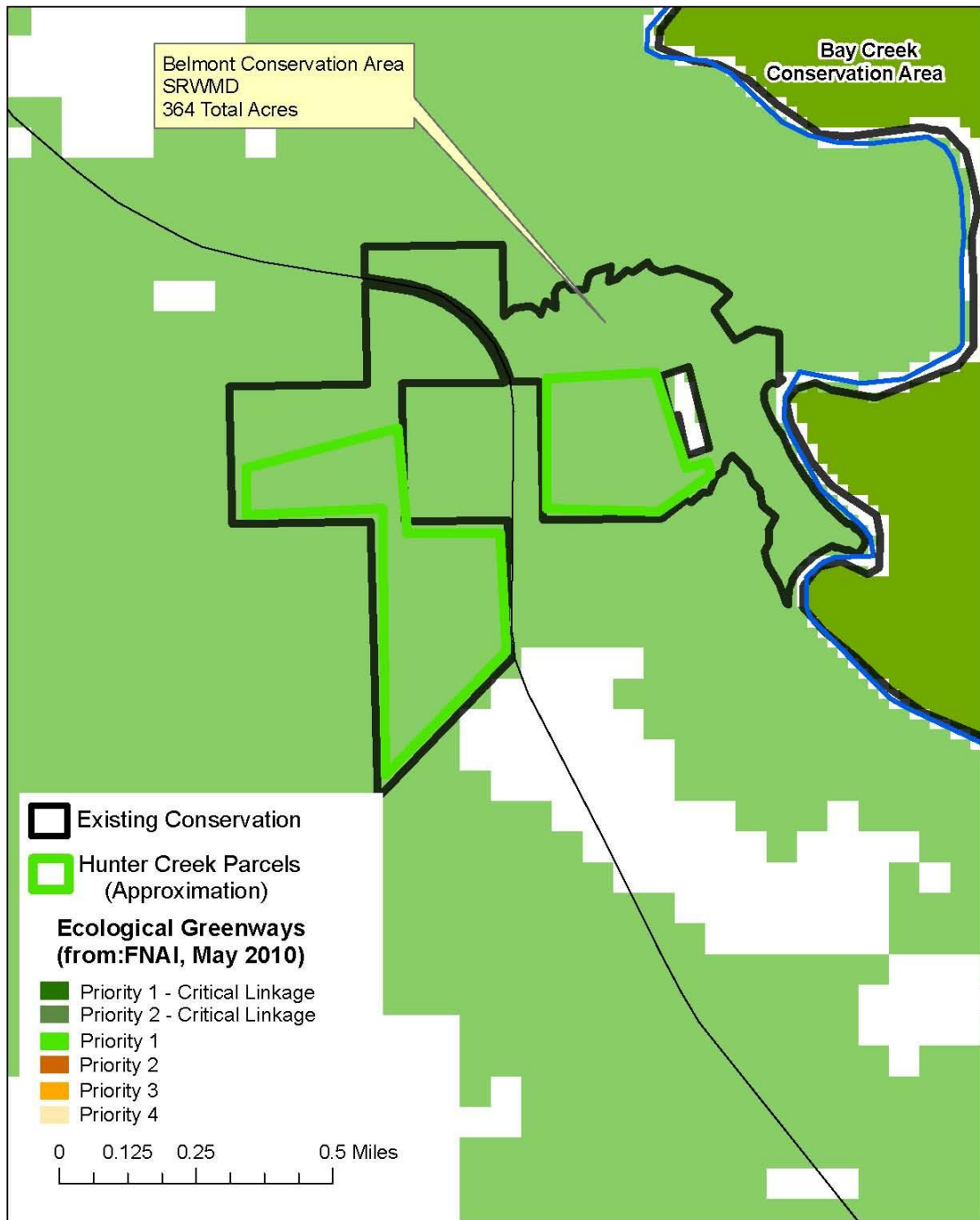


Figure 2. Ecological Greenway data for the Hunter Creek parcels. These data were developed to support the Florida Forever Needs Assessment and downloaded from the Florida Natural Areas Inventory website (fnai.org). The data prioritize lands based on site-specific ability to provide functional ecological connectivity among lands with conservation value. Only the 6 highest priority levels are depicted in this map. The Hunter Creek parcels are within a Priority 2 Critical Linkage. Data distinguishing the location of existing conservation lands was also downloaded from the Florida Natural Areas Inventory website.

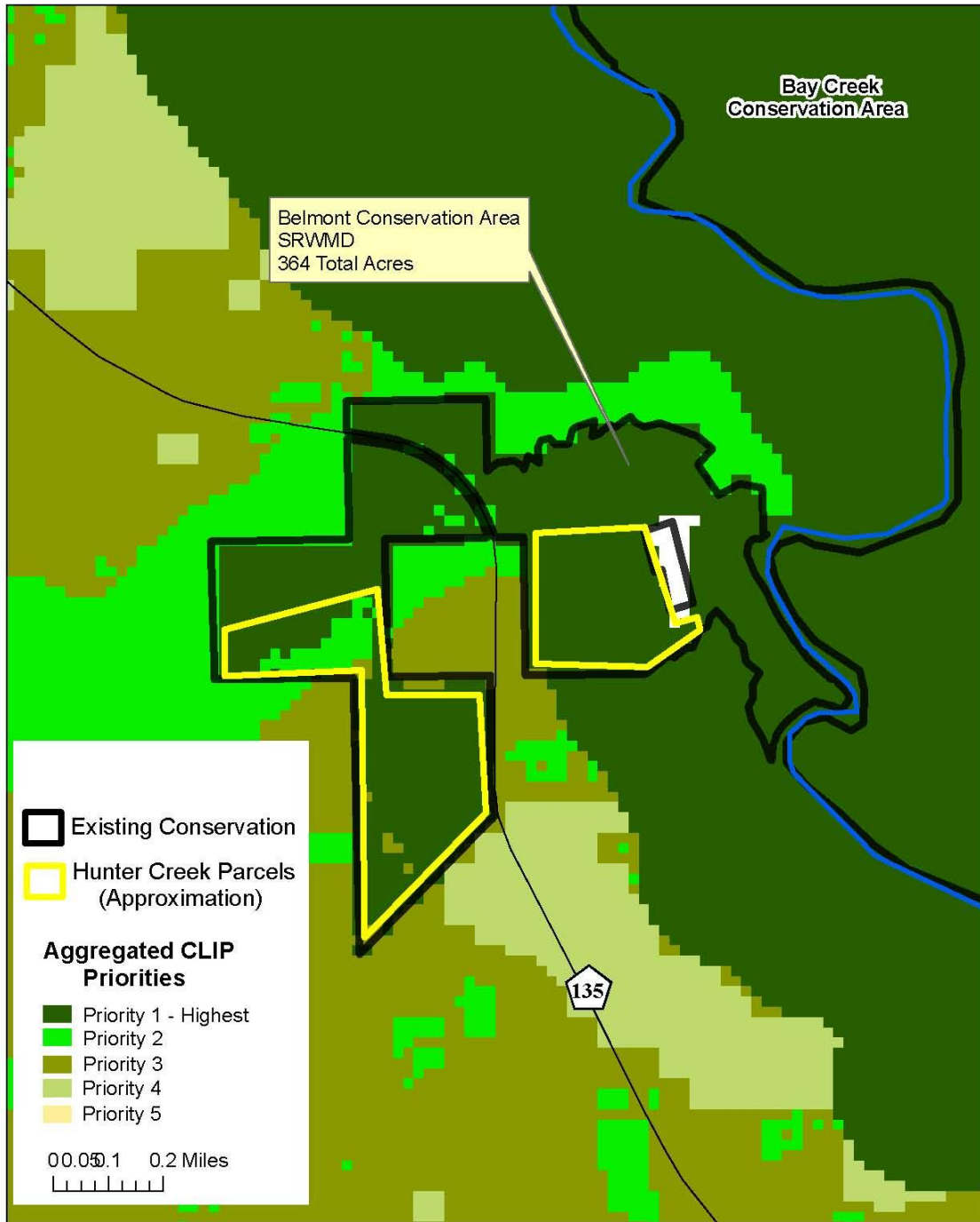


Figure 3. Aggregated CLIP Priority Map for the Hunter Creek parcels. The Critical Lands and Waters Identification Project (CLIP) developed a database on behalf of the Governor’s Century Commission for a Sustainable Florida to assist in assessing the natural resource values of lands and waters throughout Florida. The Aggregated CLIP Priority Map is a composite that depicts aggregated scores for all the base datasets within the database and includes measures of water management, habitat, and landscape integrity values. Data distinguishing the location of existing conservation lands was downloaded from the Florida Natural Areas Inventory website (fnai.org).

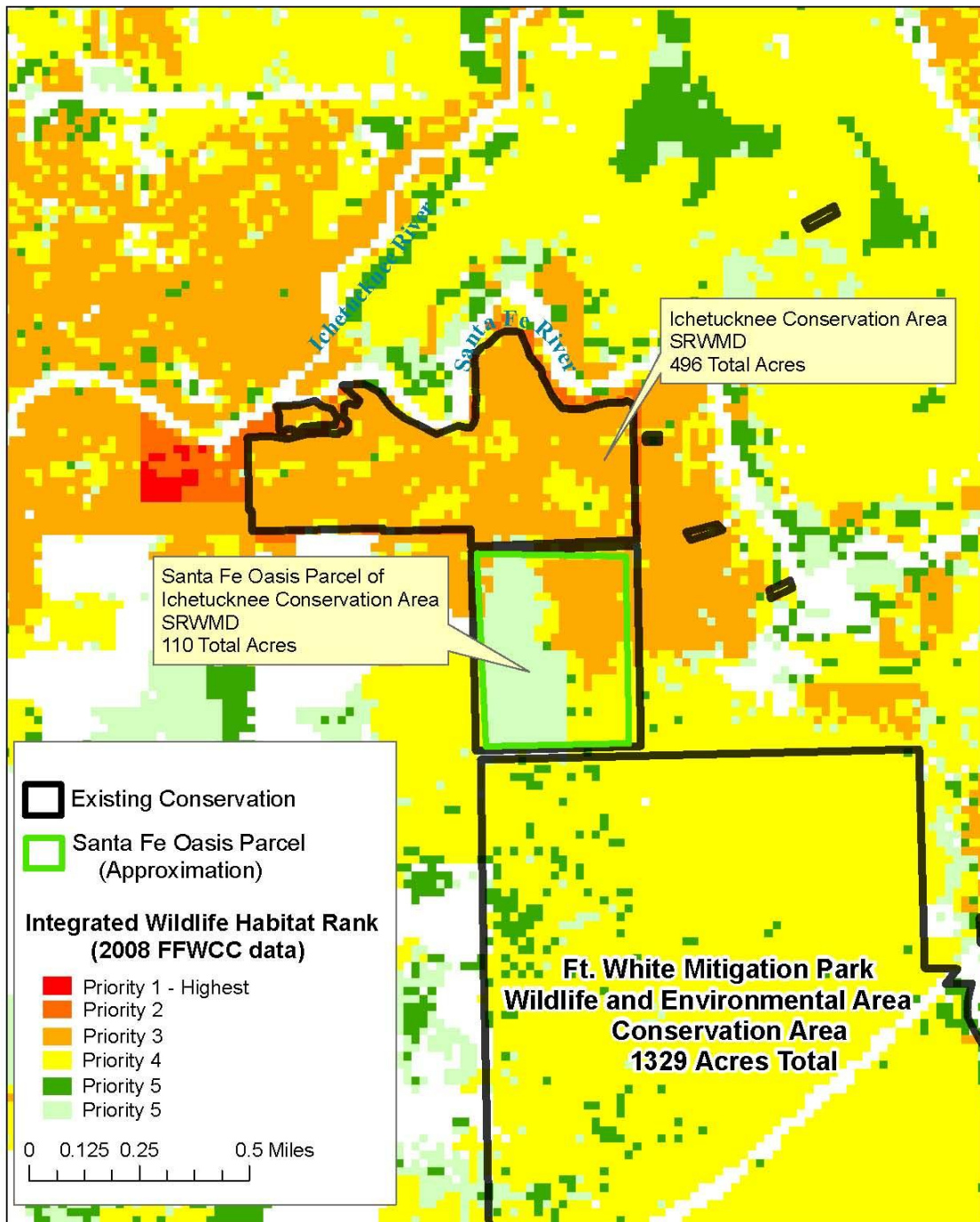


Figure 4. Integrated Wildlife Habitat Ranking System data for the Santa Fe Oasis parcel. Data were developed by the Florida Fish and Wildlife Conservation Commission (FWC) and updated in 2008 to help state and regional agencies identify lands with significant wildlife habitat values. Only the 6 highest of 10 different priority levels are depicted in this map. Data distinguishing the location of existing conservation lands was downloaded from the Florida Natural Areas Inventory website (fnai.org).

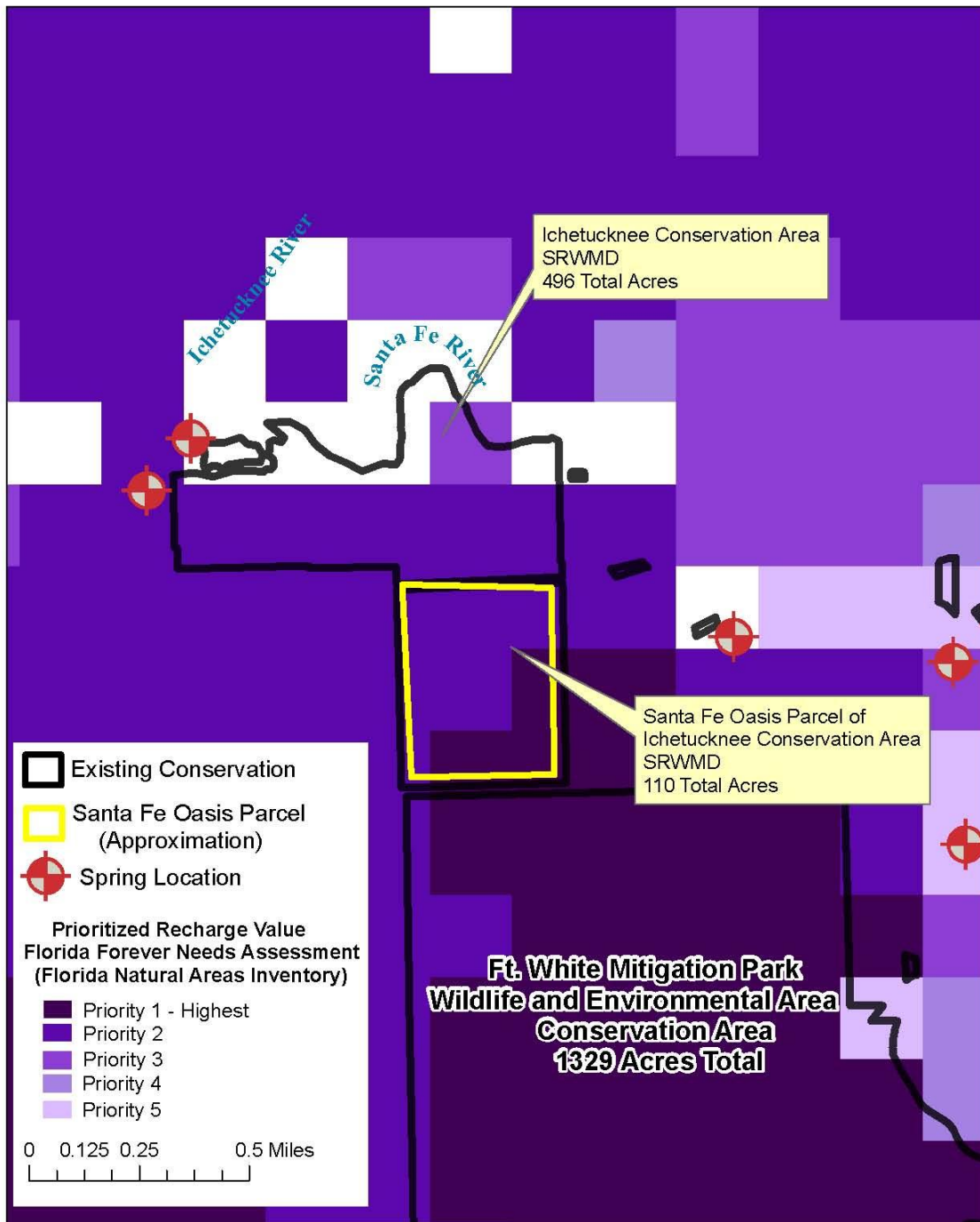


Figure 5. Prioritized Recharge Value data for the Santa Fe Oasis parcel. These data were developed to support the Florida Forever Needs Assessment and downloaded from the Florida Natural Areas Inventory website (fnai.org). Lands are prioritized on the basis of recharge potential. Data distinguishing the location of existing conservation lands was also downloaded from the Florida Natural Areas Inventory website (fnai.org).

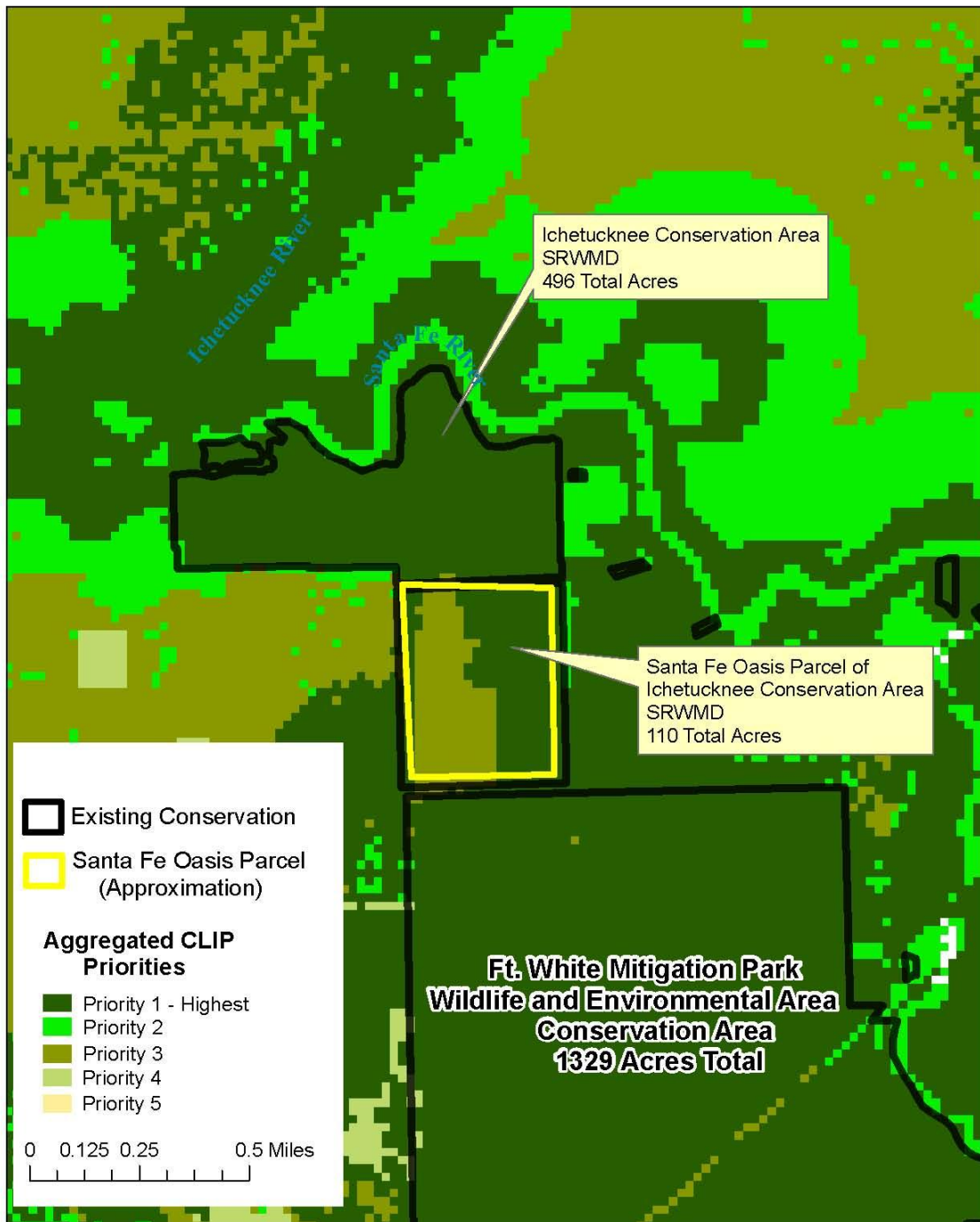


Figure 6. Aggregated CLIP Priority Map for the Santa Fe Oasis parcel. The Critical Lands and Waters Identification Project (CLIP) developed a database on behalf of the Governor's Century Commission for a Sustainable Florida to assist in assessing the natural resource values of lands and waters throughout Florida. The Aggregated CLIP Priority Map is a composite that depicts aggregated scores for all the base datasets within the database and includes measures of water management, habitat, and landscape integrity values. Data distinguishing the location of existing conservation lands was downloaded from the Florida Natural Areas Inventory website (fnai.org).

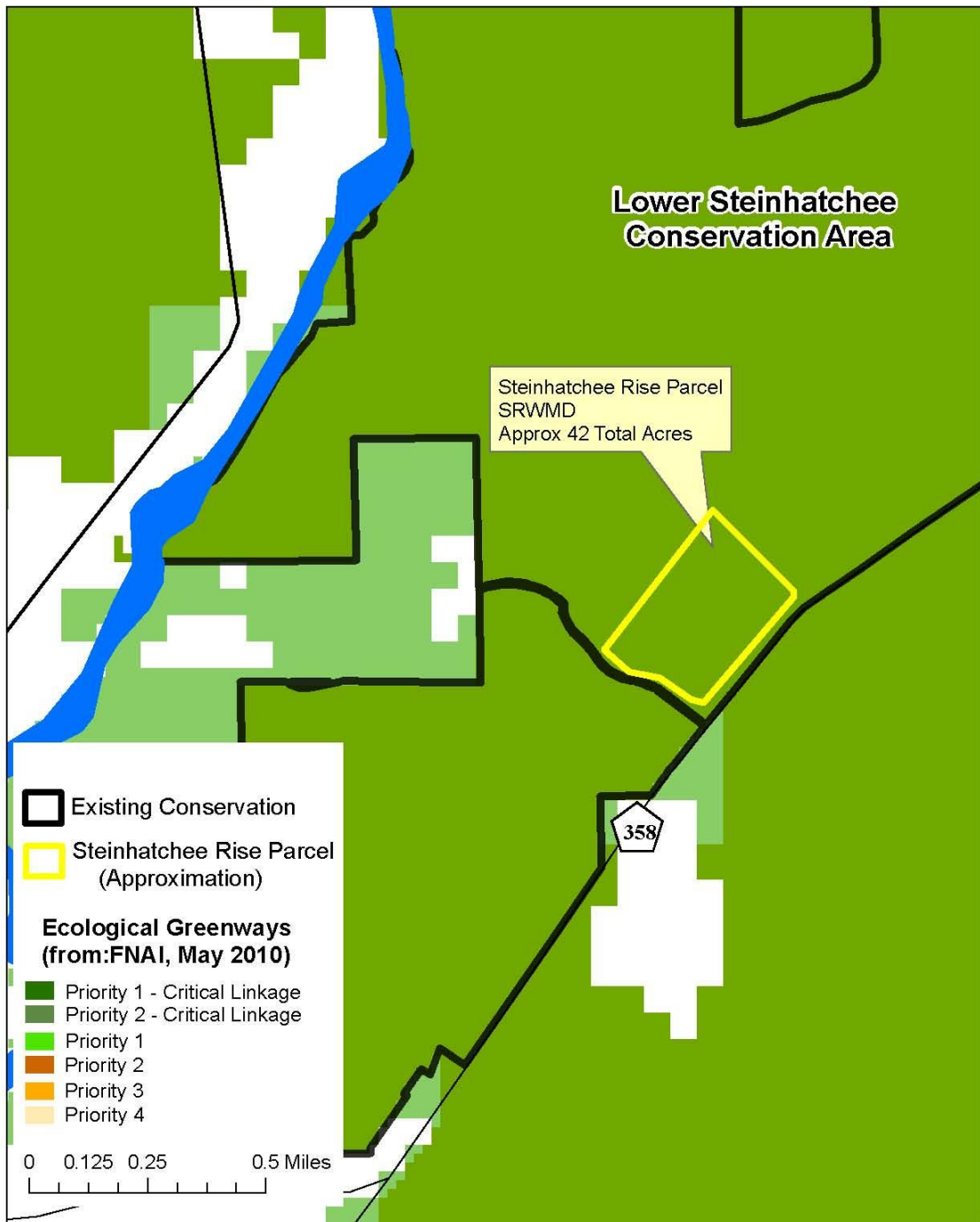


Figure 7. Ecological Greenway data for the Steinhatchee Rise parcel. These data were developed to support the Florida Forever Needs Assessment and downloaded from the Florida Natural Areas Inventory website (fnai.org). The data prioritize lands based on site-specific ability to provide functional ecological connectivity among lands with conservation value. Only the 6 highest priority levels are depicted in this map. The Steinhatchee Rise parcel is within a Priority 2 Critical Linkage. Data distinguishing the location of existing conservation lands was also downloaded from the Florida Natural Areas Inventory website.

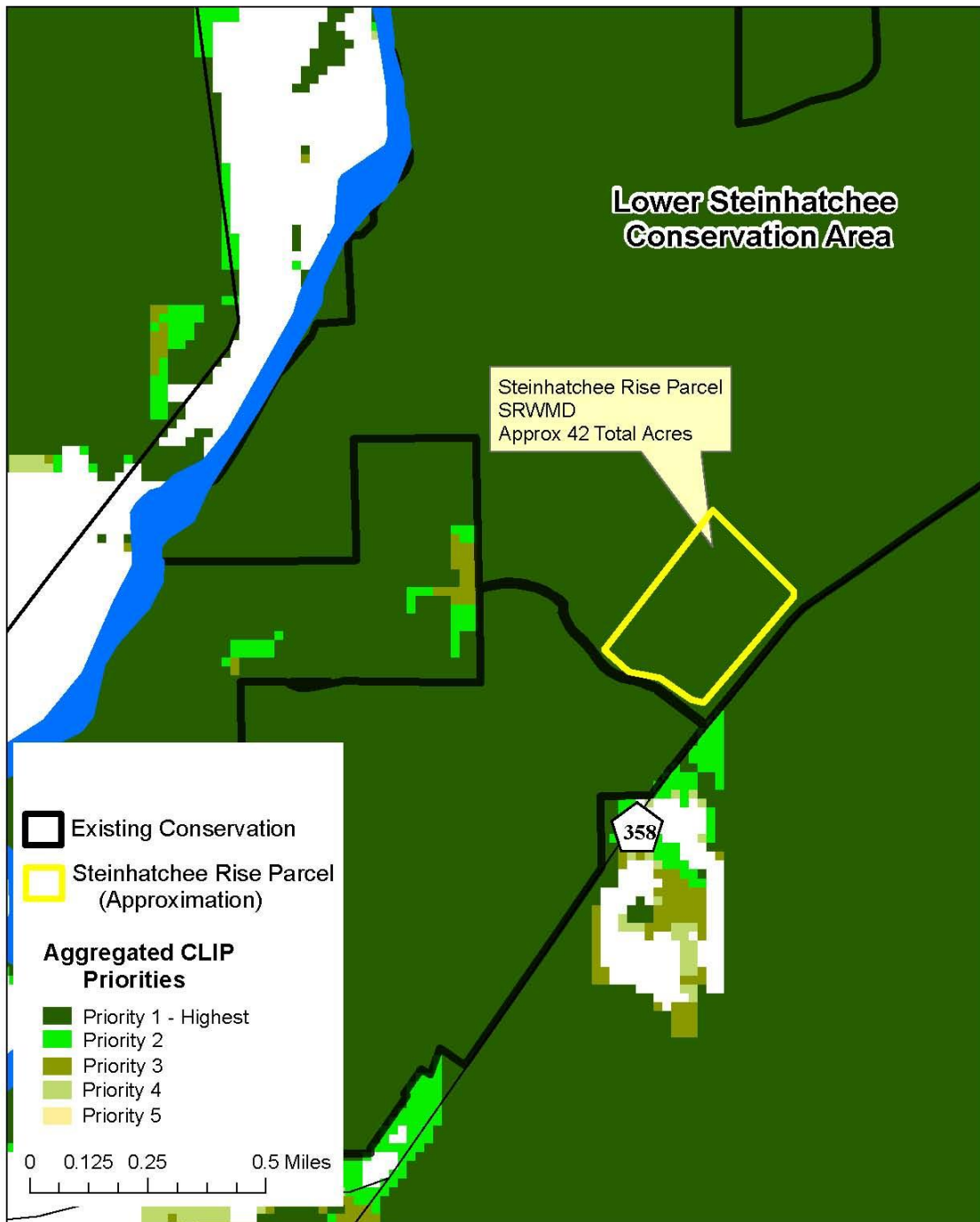


Figure 8. Aggregated CLIP Priority Map for the Steinhatchee Rise parcel. The Critical Lands and Waters Identification Project (CLIP) developed a database on behalf of the Governor’s Century Commission for a Sustainable Florida to assist in assessing the natural resource values of lands and waters throughout Florida. The Aggregated CLIP Priority Map is a composite that depicts aggregated scores for all the base datasets within the database and includes measures of water management, habitat, and landscape integrity values. Data distinguishing the location of existing conservation lands was downloaded from the Florida Natural Areas Inventory website (fnai.org).

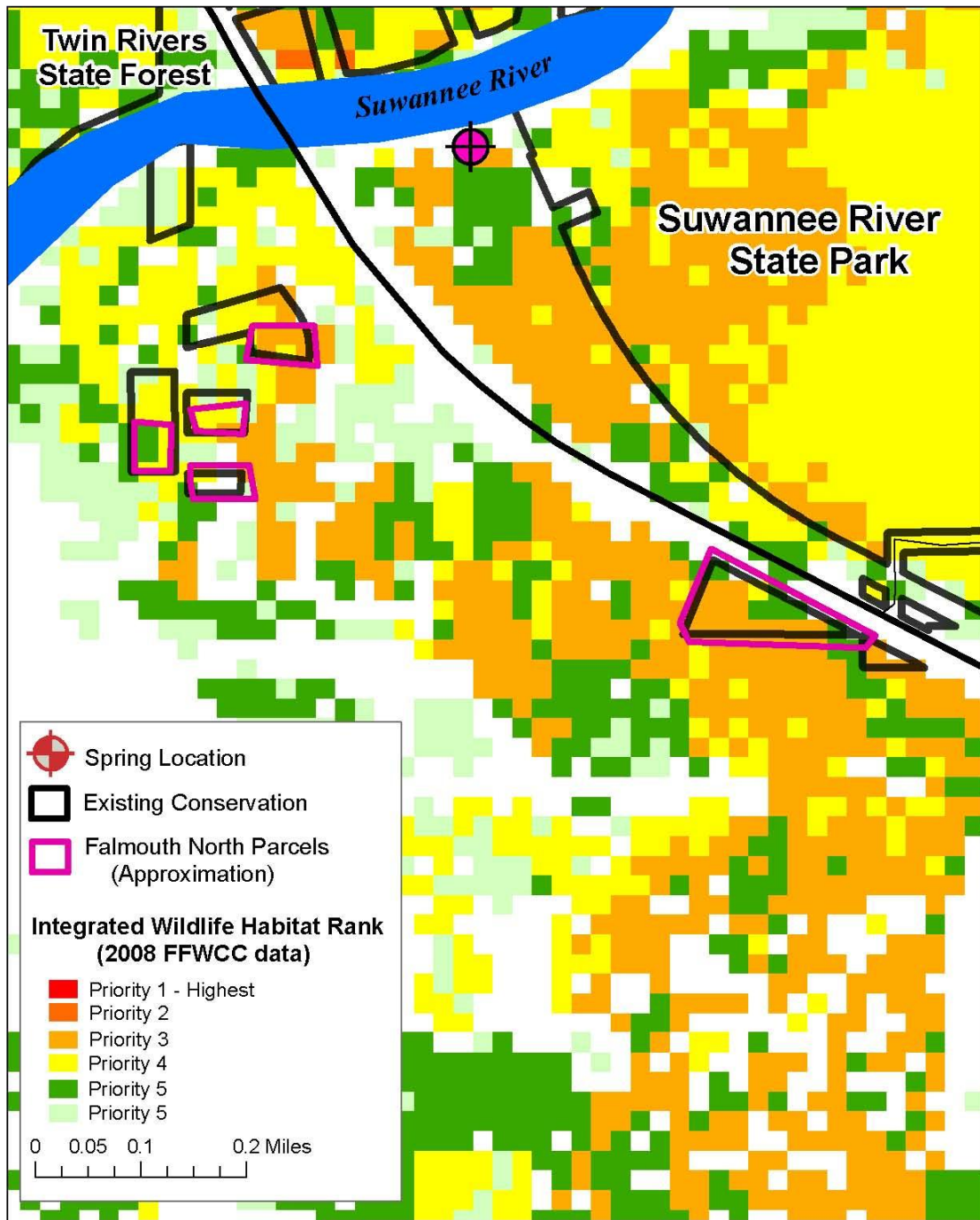


Figure 9. Integrated Wildlife Habitat Ranking System data for the Falmouth North parcels. Data were developed by the Florida Fish and Wildlife Conservation Commission (FWC) and updated in 2008 to help state and regional agencies identify lands with significant wildlife habitat values. Only the 6 highest of 10 different priority levels are depicted in this map. Data distinguishing the location of existing conservation lands was downloaded from the Florida Natural Areas Inventory website (fnai.org).



Figure 10. Prioritized Recharge Value data for the Falmouth North parcels. These data were developed to support the Florida Forever Needs Assessment and downloaded from the Florida Natural Areas Inventory website (fnai.org). Lands are prioritized on the basis of recharge potential. Data distinguishing the location of existing conservation lands was also downloaded from the Florida Natural Areas Inventory website (fnai.org).



Figure 11. Aggregated CLIP Priority Map for the Falmouth North parcels. The Critical Lands and Waters Identification Project (CLIP) developed a database on behalf of the Governor’s Century Commission for a Sustainable Florida to assist in assessing the natural resource values of lands and waters throughout Florida. The Aggregated CLIP Priority Map is a composite that depicts aggregated scores for all the base datasets within the database and includes measures of water management, habitat, and landscape integrity values. Data distinguishing the location of existing conservation lands was downloaded from the Florida Natural Areas Inventory website (fnai.org).