



FLORIDA NATIVE PLANT SOCIETY

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Melbourne, FL 32902-0278

September 11, 2024

Rick Dolan, Director
Florida Forest Service
3125 Conner Boulevard
Tallahassee, Florida 32399-1650

Subject: Florida Native Plant Society Objection to Proposed Parcel Swap

Dear Director Dolan:

The Florida Native Plant Society (FNPS) has assessed the merits of a proposal to declare as surplus a 324-acre parcel of land in the Withlacoochee State Forest (WSF) in order to facilitate a swap of the parcel for a privately owned 860-acre stand of pine plantation (Jtmr Timber parcel) in Levy County. The Governor and Cabinet approved consideration of this proposal, as submitted by Cabot Citrus OpCo LLC, on June 12 contingent upon review and approval by both the Florida Forest Service (FFS) and the Acquisition and Restoration Council (ARC).

FNPS determined the parcel has substantial conservation value and therefore does not qualify to be declared surplus pursuant to §253.0341(1), F.S. FNPS also determined the proposed exchange would not result in a net conservation benefit. As such, we recommend FFS immediately suspend any further consideration of the proposal.

Our assessment included both field visits and a review of the Florida Forever Conservation Needs Assessment spatial data maintained by the Florida Natural Areas Inventory (FNAI). These data are used by the state to help identify and prioritize lands suitable for conservation through the Florida Forever land acquisition program. The following is a partial listing of the conservation and natural resource values associated with the parcel:

1) Contiguity with other publicly owned conservation land

The northern boundary of the parcel is contiguous with adjoining lands of the WSF for a distance of 0.9 miles (Map 1). Contiguity along the west boundary is interrupted solely by the width of the Suncoast Parkway (SR 589) right-of-way. In addition to enhancing wildlife habitat value and management efficiency, contiguity expands opportunities for natural resource-based recreational use. In contrast, the Jtmr Timber parcel in Levy County lacks any contiguity with public conservation land and is located 17 miles west of the nearest FFS managed lands at Goethe State Forest. It is doubtful any state agency would want to manage such an isolated parcel.

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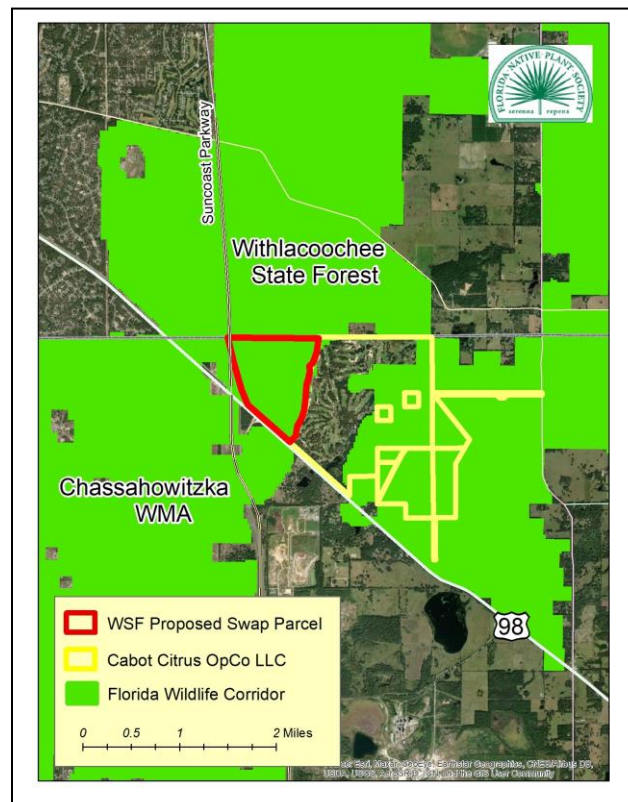
2) Significant habitat connectivity within the Florida Wildlife Corridor

The parcel is located wholly within the Florida Wildlife Corridor at a vulnerable pinch-point where a tenuous connection is maintained between the conserved lands of the Chassahowitzka Wildlife Management Area to the west, and those of the Citrus Tract of WSF (Map 2) to the north. The *Florida Black Bear Management Plan* (2019) states that habitat conservation in this Bear Management Unit "...should focus on establishing landscape connectivity between the Chassahowitzka bears and unoccupied, quality habitat in Withlacoochee SF...". Removing the parcel from protected status would substantially reduce this already tenuous connection, which provides the best remaining opportunity for maintaining connectivity between these conserved lands due to patterns of existing development and the intense development pressures in the region. In contrast, the Jtmr Timber parcel, while also within the Florida Wildlife Corridor, is in an area with little development pressure and many opportunities for preserving connectivity.



Map 1. Public Conservation Land

(Spatial data for conservation land boundaries and the Florida Wildlife Corridor from FNAI.)



Map 2. Florida Wildlife Corridor

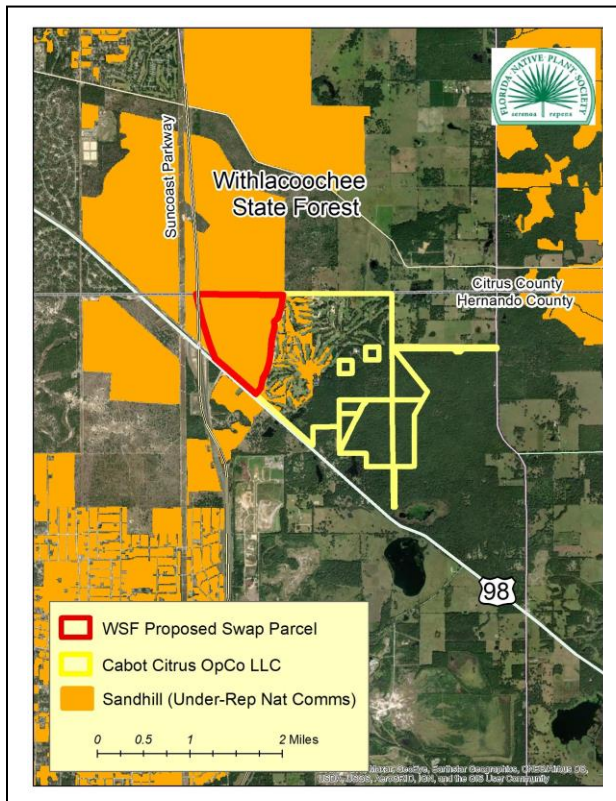
3) Overlap with sandhill component of Under-represented Natural Communities data
FNAI's Under-represented Natural Communities data distinguishes land areas important for the conservation of native plant communities that are insufficiently represented among currently protected conservation lands. Those data identify the parcel as sandhill (Map 3), and although it was converted to sand pine plantation while under previous ownership, field visits determined much of the remnant native vegetation remaining under the closed canopy of sand pine is

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representative of sandhill (e.g., turkey oak, sand post oak, sand live oak, saw palmetto, gopher apple, wiregrass, lovegrass, Adam’s needle, prickly-pear cactus, silk grass, blazing star, paint brush, and yellow buttons). A soils analysis indicated the entire parcel is underlain by Candler fine sands, which also are diagnostic of sandhill habitat. WSF is renowned for the exemplary sandhill habitat protected there and the management staff assigned to WSF have demonstrated a proficiency for restoring degraded sandhill, suggesting the parcel is ideally suited for sandhill restoration.

4) High (Priority 1) recharge value

The groundwater recharge value of the parcel ranks in the highest category (Map 4). High recharge values are indicative of sites that may be especially vulnerable to groundwater contamination. Conserving such sites precludes development that could be a source of future groundwater contamination. The parcel is in the Chassahowitzka springshed and less than 6 miles from the headsprings of this Outstanding Florida Spring. The Florida Department of Environmental Protection is currently updating the Basin Management Action Plan for the spring system to identify strategies and projects that will help ameliorate the nutrient pollution that has impaired its water quality. The current BMAP attributes >30 percent of the nutrient pollution contaminating the Chassahowitzka system to the fertilization of turf grass in the springshed. Protecting the parcel from development that would exacerbate nutrient pollution of the groundwater feeding the spring will contribute to the long-term protection of the spring system.



Map 3. Under-Represented Natural Communities
(Spatial data for Under-represented Natural Communities and Prioritized Recharge from FNAI.)

Map 4. Prioritized Recharge

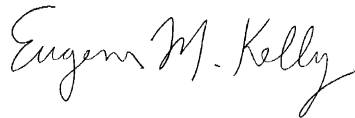
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A final point - a total of 13 gopher tortoise burrows were observed on the small portion of the parcel that was surveyed during our field visits. Coordinates for the burrows can be provided upon request.

In summary, our cursory assessment has documented conservation values sufficient to preclude any determination the parcel should be declared surplus. The parcel's role in maintaining landscape connectivity within the Florida Wildlife Corridor, in and of itself, justifies retention in public ownership.

It is easy to understand why Cabot Citrus OpCo LLC covets the parcel for development, but difficult to understand why FFS would even consider relinquishing ownership. The public has recently begun to doubt the state's commitment to land conservation. You have an opportunity to help restore the public's trust by demonstrating that private development interests are not driving the decision-making process. Please bring this ill-conceived proposal to a swift conclusion by simply acknowledging FFS will not support it.

Respectfully,

A handwritten signature in cursive script that reads "Eugene M. Kelly".

Eugene M. Kelly, President
Florida Native Plant Society

cc: Wilton Simpson, Florida Commissioner of Agriculture