



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.

April 27, 2015

SUBJECT: Has Florida Already Conserved Too Much Land? Do We Properly Manage What We Own?

Dear Senator or Representative:

Much of the debate surrounding the distribution of Amendment 1 funds has revolved largely around whether Florida should conserve additional land through public acquisition. Many legislators have taken the position that Florida is not properly managing the land it already owns – so it would be irresponsible to purchase more. Some legislators go a step further and suggest our inability to properly manage what we already own is a clear sign we have already acquired too much land.

The Florida Native Plant Society (Society) has a firm position on this issue, and it is a position backed by an abundance of science and observable evidence. We ask that you consider the following facts as you continue your deliberations, now and in future years, about spending on the Florida Forever program.

Do we properly manage what we already own?

Our public lands represent a huge public investment, and a well-managed investment should appreciate in value. It would be foolhardy to keep buying land while failing to safeguard what we already own. The agencies responsible for safeguarding that investment should be held accountable. To that end:

- A land management plan must be prepared for every state owned conservation property and meet the minimum requirements established by law (Sections 253.034(5) and 259.032(10), F.S.)
- Each property must undergo a land management review every five years. The reviews are performed by teams of experts representing the state agencies and must also include a private landowner and/or a citizen representative from a private conservation organization
- The reviews must determine: 1) Is the property being managed for the purpose of its acquisition?; and 2) Is it being managed in accordance with the management plan?
- Of 462 reviews coordinated by the Division of State Lands, only 7 failed to meet all statutory requirements for a success rate of 98%; 5 of the 7 subsequently passed in a follow-up review.

Two other measures of the quality of land management in Florida:

- We have the most active and successful prescribed fire program in the southeast, and are recognized as a model for fire management by other states; and
- Florida's state park system is the only 3-time Gold Medal winner for having the finest state park system in the nation.

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If you can share specific examples of inadequate attention to land management, we would welcome hearing about them, because they should be addressed and the Society will stand with you on that point. Representatives of the Society have served on many of the land management review teams because we recognize the fundamental importance of good land management. To date, all we have heard are broad-brush statements about inadequate management. If your examples are a result of inadequate funding (i.e., staffing, equipment, or other resources), then they underscore the Society's position that Amendment 1 funds should be used to supplement existing sources of funding for our land management programs.

Has Florida already conserved too much land?

One argument against conserving more land contends that Florida doesn't even know what lands have already been protected. While it can be difficult to hit a moving target, we succeed very well at maintaining an up-to-date inventory of public lands (<http://fnai.org/webmaps/ConLandsMap/> and http://fnai.org/PDF/Maacres_201502_FCL_plus_LTF.pdf). Is that current inventory of lands sufficient to conserve Florida's natural resources in perpetuity? Will it satisfy the needs and desires for our posterity and allow them to enjoy the same quality of life that we enjoy today as Floridians? There is much evidence indicating the answer to that question is an emphatic "no", including:

- There are 133 animal species and 534 plant species designated as threatened or endangered.
- A 2010 assessment determined that 80% of our rivers, 90% of our lakes, and 97% of our estuaries are impaired because they cannot meet established water quality standards.
- Urban sprawl consumed approximately 768,000 acres of habitat and working landscapes (forests and ranches) between 2000 and 2010, or nearly 2% of the entire state.

What do such trends tell us? How do we address the challenges those trends represent if we dismiss land conservation as an important tool to counter them? The Society contends that we cannot.

We've already acknowledged the tremendous investment our portfolio of conservation land represents. Buying land is expensive, and decisions about which lands to buy should be guided by science, practical considerations, and ensuring the public gets the best bang-for-the-buck with its land acquisition dollars. For decades, Florida's land conservation programs have recognized the need for accountability and have consistently refined the processes necessary to impose and exhibit such accountability. The Florida Forever 5-Year Plan (http://www.dep.state.fl.us/lands/FFAnnual/March_2014FloridaForever.pdf) and the rigorous scientific analyses that underpin the Florida Forever Conservation Needs Assessment (http://fnai.org/PDF/FFCNA_TechReport_v4_01.pdf) demonstrate such accountability. Both are continually updated and help identify which lands should be conserved, and why. Would the land:

- Protect important habitat for imperiled plant and animal species? (see *Strategic Habitat Conservation Areas** and *Rare Species Habitat Conservation Priorities*)
- Protect rare or sensitive habitat types that are not already sufficiently conserved? (see *Under-represented Natural Communities*)
- Protect a connection between nearby lands and help create an ecologically functional network of linked lands? (see *Significant Landscapes, Linkages and Conservation Corridors*)
- Conserve a "working forest" that could remain in private ownership and be effectively protected by a conservation easement? (see *Sustainable Forest Management*)

- Conserve a floodplain area that protects homes and other private property by storing floodwater while also protecting valuable wildlife habitat? (see *Natural Floodplain*)
- Protect water sources important for people and/or nature? (see *Surface Water Protection; Functional Wetlands* and *Aquifer Recharge*)
- Protect coastal lands important to our tourism industry, coastal wildlife and quality of life? (see *Fragile Coastal Resources*)
- Provide other “people” values, like significant recreational opportunities or protection of cultural and archaeological sites? (see *Recreational Trails* and *Significant Archaeological Sites*).

*The underscored items are separate analyses within the Florida Forever Conservation Needs Assessment.

It would be difficult to find anyone, anywhere, who has done a better than Florida at using the best available science and practical, real-world considerations to help guide its land conservation priorities and ensure accountability to the taxpayers. **This should be a source of pride to our legislature!**

It’s often said we are each entitled to our own opinions, but not to our own facts. The challenge policymakers often face is the need to make decisions with limited factual information to guide them. However, if the legislature is basing its opposition to increased funding for Florida Forever on a contention that we have failed to properly manage the land we already own, or that we have already conserved sufficient lands to meet conservation objectives, then we submit you are basing your position on your own set of facts – a set of facts that does not comport with reality!

The Senate’s polling of Floridians clearly demonstrates that the Society’s position is consistent with the intent of the overwhelming majority of voters who made Amendment 1 law. We hope you are open to considering all the evidence that additional work remains to be done before Florida can claim to have protected a functional network of conservation lands, and that you will recognize the outstanding job public land managers are doing to protect our public lands and make them available for the people to enjoy. It should then be easy to reach a consensus on Amendment 1 spending. Dedicate a majority of the funds to land acquisition and use the remainder to provide supplemental funding for land management and advance other pressing conservation objectives - like accelerating restoration of the Everglades and reversing the degradation of our springs and estuaries.

Thank you for considering our concerns. We stand ready to assist you in any way possible. Please do not hesitate to contact us if you require additional information or explanation of our position.

Respectfully,

Anne C. Cox

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