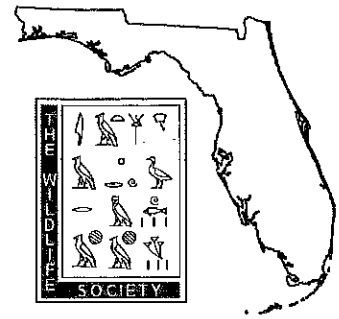


Florida Chapter
THE WILDLIFE SOCIETY
www.fltws.org



29 October 2013

Ms. Marianne S. Gengenbach, Administrator
Office of Environmental Services, Division of State Lands
Florida Department of Environmental Protection
3900 Commonwealth Blvd., MS-100
Tallahassee, FL 32399-3000

Dear Ms. Gengenbach:

The Florida Chapter of The Wildlife Society (FLTWS) is a non-profit conservation organization of wildlife professionals, educators, and students dedicated to sustainable management of wildlife resources and their habitats in Florida. With approximately 250 members, the FLTWS is recognized as a proactive group that promotes wildlife research and management, and develops positions on natural resource issues based on sound biological data and principles. Our parent organization, The Wildlife Society, has over 10,000 members and is the certifying body for wildlife biologists in North America.

FLTWS does not agree that Florida Forever's conservation land acquisition program should be funded by selling conservation lands that have already been acquired. Although there may be tracts that are "no longer needed for conservation purposes", the false implication is that acquisition efforts since the 1980s have resulted in a large amount of conservation land that should be returned to the private sector and the tax base. We do not believe this is true. However, we welcome the process designed to identify surplus lands because we feel it will show that the amount of land truly unnecessary for conservation is, in fact, very small, and certainly not worth \$50 million.

Before the identification of surplus lands proceeds further, the term "no longer needed for conservation purposes" (Chapters 253.034 and 373.089 F.S.) should be defined more clearly. Certainly, any acquired lands that are essentially in a natural state should never be considered "surplus", as they undoubtedly retain conservation value to native wildlife and plants, and especially protected species, even if they are disjunct from primary management tracts leased to state managers. We recognize the plight of managing agencies regarding staffing and funding for proper management of the lands leased to them, but feel that the justification for designating lands as surplus should be stronger than "no longer needed for conservation purposes." Therefore, FLTWS's position is that any and all tracts or acreage should be removed from the surplus lands list if they:

- are within or adjacent to federal, state, local government, or private (e.g., Nature Conservancy) conservation zones, critical habitat or other designations, including


- Areas of Critical State Concern and all other such designations and protections the State has previously recognized;
- were bought in conjunction with other conservation land acquisition programs (e.g., water management districts, local government programs, private cooperators);
 - are within areas covered by Florida's plan prepared under the federal Coastal and Estuary Land Conservation Program (CELCP), and covered by Chapter 380.21(4), F. S.;
 - are lands that have the potential to serve as habitat mitigation tracts for past development that negatively impacted wildlife (e.g., Hilochee tracts adjacent to I-4 that could serve USDOT and FLDOT when constructing wildlife underpasses);
 - are particularly unique habitats with plants and wildlife that are inextricably tied to these habitats (e.g., the tropical hardwood hammocks in the Keys that are essentially a non-renewable resource with 1,500-year-old trees).

In addition to those above, there might be other criteria that should be considered before land is designated for sale as surplus. FLTWS may suggest removal of specific tracts from the surplus list as the process proceeds.

We recognize the difficulties inherent in this exercise, and appreciate the efforts of the staffs at DEP and Division of State Lands, the members of ARC, as well as the staffs at the managing agencies. As difficult as the process is, we feel it is a good effort that will result in significant information for upcoming land-use decisions.

Thank you for your consideration. Questions or comments may be addressed to Erin Myers, FLTWS President (erin.myers@fltws.org) and/or Rebecca Bolt, Conservation Committee chairperson (rebecca.bolt@fltws.org).

Sincerely,



Erin Myers, President
Florida Chapter of The Wildlife Society