

SFWMD
Land Assessment
Upper Lakes Region

Additional Public Comments
received
January 11-February 18, 2013



February 18, 2013

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Ray Palmer
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33406
rpalmer@sfwmd.gov

RE: South Florida Water Management District (SFWMD), Land Assessment of the
Upper Lakes Region

Dear Mr. Palmer:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed the 2013 SFWMD Land Assessment for the Upper Lakes Region. The following comments are provided as technical assistance for your consideration.

Project Description

The SFWMD is conducting a comprehensive assessment of its fee-simple land holdings. This assessment is intended to ensure that the current and future use of these lands fulfill the core missions of the SFWMD and support other important state policy objectives. The assessment process is being conducted in phases, beginning with the Upper Lakes Region of central Florida. The SFWMD's fee-simple land holdings for the Upper Lakes Region consist of Tibet-Butler Preserve, Shingle Creek, Lake Marion Creek and Reedy Creek, and the SUMICA property. Together, these lands comprise approximately 20,000 acres of land currently held in conservation.

Ecological Context for the Upper Lakes Region

In 1994, FWC assessed the security of rare and imperiled species on existing conservation lands in Florida. This report, *Closing the Gaps in Florida's Wildlife Habitat Conservation System* (Cox et al. 1994), used wildlife data in Geographic Information Systems (GIS) to assess the protections afforded to 62 focal species and identify important habitat areas in Florida that had no conservation protection. These areas came to be known as Strategic Habitat Conservation Areas (SHCA), which are delineated into five classes based upon Heritage ranking criteria developed by The Nature Conservancy, the Natural Heritage Program Network, and the Florida Natural Areas Inventory. This methodology was originally developed as part of the Critical Lands and Waters Identification Project (CLIP) for the Century Commission for a Sustainable Florida. FWC has since provided an update to its initial *Closing the Gaps* report called *Wildlife Habitat Conservation Needs in Florida* (Endies et al. 2009). SHCA are noted in portions of Shingle Creek, Reedy Creek, and Lake Marion Creek, and are located adjacent to Tibet-Butler Preserve and SUMICA. Most of the SHCA are classified as Priority 2 for the Florida black bear, Florida scrub-jay, Florida snail kite, sand skink, short-tailed hawk, and striped newt. GIS data from Cox et al. (1994) was also used to identify biodiversity hotspots in Florida, coinciding with overlapping focal species

habitat. Based on this analysis, FWC estimates that most of the Upper Lakes Region support 7 or more focal species.

The East Central Florida Regional Planning Council also conducted a GIS exercise as part of its *Strategic Regional Policy Plan* report. The *Policy Plan* recognizes open space and natural resources as green infrastructure important to wildlife and the public. The *Policy Plan* also addresses the protection of regional natural resources and indirect ecosystem service benefits generated by conservation lands and private rural lands. Collectively, the GIS data generated by the *Policy Plan* was used to identify some of the natural resources of regional significance in central Florida. Some of the natural resources of regional significance include regional committed conservation areas such as Shingle Creek, Lake Marion Creek and Reedy Creek, as well as FWC's biodiversity hotspots and the Florida Natural Areas Inventory for rare species habitat conservation priorities. These areas are within or adjacent to the land assessment areas for the Upper Lakes Region.

Land Assessment Areas for the Upper Lakes Region

Tibet-Butler Preserve

The Tibet-Butler Preserve (Preserve) is a 438-acre parcel located on the southwest shoreline of Lake Tibet, designated an Outstanding Florida Water by the Florida Department of Environmental Protection. The Preserve is host to the Vera Carter Environmental Center, which is operated and managed by the Orange County Parks Department. The Vera Carter Environmental Center offers a variety of nature-based exhibits and ongoing environmental programs that focus on Florida's plants, animals, and natural resources. Some of the environmental programs include courses in basic bird-watching, birding hikes, local history of Native American heritage, and public outreach to discuss on-going restoration projects in the area. The Preserve also offers more than four miles of interpretive hiking trails and elevated boardwalks that radiate from the Environmental Center and traverse into natural communities such as cypress swamps, freshwater marshes, upland scrub, and pine flatwoods. These trails are part of the De Soto trail system and Site E106 of the Great Florida Birding and Wildlife Trail, a project lead and supported by FWC.

The Orange County Parks Department has compiled a list of wildlife species observed within the Preserve. Based on this list, observed wildlife include 98 bird, 21 mammal, 30 reptile, and 15 amphibian species (Orange County, pers. comm., 2013); among the observed wildlife, 16 species are classified by federal and state agencies as endangered, threatened, or species of special concern. The federal- and state-listed species include gopher tortoise, Sherman's fox squirrel, Florida pine snake, Eastern indigo snake, Southeastern American kestrel, Florida mouse, Florida sandhill crane, little blue heron, snowy egret, tricolored heron, white ibis, and wood stork. Florida black bear and bald eagles have also been observed on the Preserve. The Florida black bear was delisted by FWC in June 2012; however, it is still protected by provisions of Chapter 379, Florida Statutes, and Chapter 68A-4.009, Florida Administrative Code. The bald eagle was also delisted by federal and state agencies, but remains protected under the federal Bald and Golden Eagle Protection Act and state rule 68A-16.002, F.A.C. FWC has identified

habitats adjacent to the Preserve as Strategic Habitat Conservation Areas (Cox et al. 1994; Endries et al. 2009), a product of the Critical Lands and Waters Identification Project (CLIP).

The FWC's Invasive Plant Management (IPM) Section is responsible for coordinating and funding two statewide programs controlling invasive/exotic plants in public conservation areas and waterways, including Lake Tibet. In 2011 the IPM Section treated Lake Tibet for hydrilla, which is an invasive/exotic aquatic plant easily spread by boats. The treatment of hydrilla and other invasive/exotic aquatic plants is necessary for the health of Florida's waters and to enable continued recreational boating and other aquatic activities.

Shingle Creek Swamp

Shingle Creek swamp is one of four primary hydrologic sources for the Kissimmee Chain of Lakes, which forms the headwaters of the Kissimmee-Okeechobee-Everglades watershed system. Historically, the swamp was part of an extensive floodplain forest dotted with upland islands and pine flatwoods. The remnant area still supports a diversity of habitat types including mixed hardwood swamps, pine flatwoods, cypress swamps, oak hammocks, wet prairies, and depression marshes. Approximately 60 percent of the Shingle Creek swamp is considered wetlands, most of which is within the 100-year floodplain of Shingle Creek. Uplands include prairie and flatwoods adjacent to wetland communities. SFWMD manages the uplands with prescribed fire; FWC staff assists the SFWMD with its prescribed fire activities.

SFWMD maintains an inventory of wildlife species that have been observed within Shingle Creek swamp. The list is provided in the Shingle Creek Management Area Five-Year General Management Plan (SFWMD 2010a). Based on this list, wildlife reported in Shingle Creek swamp include 106 bird, 9 mammal, 27 reptile, 13 amphibian, 20 fish, and 48 butterfly species; among the observed wildlife, 19 species are classified as endangered, threatened, or of special concern. These species include gopher tortoise, Sherman's fox squirrels, Florida sandhill crane, limpkin, little blue heron, snowy egret, tricolored heron, white ibis, and wood stork. Bald eagles have also been observed on or over Shingle Creek swamp. FWC also notes that the mouth of Shingle Creek near Lake Tohopekaliga has gained a reputation as a prime location for anglers to catch black crappie.

FWC has identified the area in and around Shingle Creek swamp as a "Priority Wetland for Listed Species," essential to the long-term survival of wetland dependent vertebrates that are endangered, threatened, or of special concern (Kautz et al. 1994). Shingle Creek swamp has also been identified by FWC as a "Biodiversity Hotspot," which corresponds to the number of focal species with potential habitat occurring at each location in the area (Endries et al. 2009). This data is part of CLIP and FWC's Cooperative Conservation Blueprint, a statewide collaborative effort to identify the state's most important conservation priorities.

Lake Marion Creek and Reedy Creek

Lake Marion Creek and Reedy Creek consist of lowlands and tributaries that flow into the Kissimmee Chain of Lakes, which form the headwaters of the Kissimmee-Okeechobee-Everglades watershed system. An extensive network of swamps and hardwood wetlands comprise approximately 50 percent of the area, and most are within the 100-year floodplain of Lake Marion Creek, Snell Creek, Horse Creek, and Reedy Creek. Uplands include pine flatwood islands surrounded by forested wetlands. Portions of Lake Marion Creek also include rare plant communities such as seepage slopes, sandhills, scrub and scrubby flatwoods associated with the remnant Lake Wales Ridge. Many of these areas require frequent fire to maintain their vegetative characteristics and biodiversity. Like Shingle Creek, SFWMD manages the uplands in Lake Marion Creek and Reedy Creek with prescribed burns. FWC staff assists SFWMD with its prescribed burning activities.

SFWMD also maintains an inventory of wildlife species that have been observed within Lake Marion Creek and Reedy Creek. The list is provided in the Lake Marion Creek and Reedy Creek Management Area Five-Year General Management Plan (SFWMD 2010b). Wildlife reported in the area includes 215 bird, 46 mammal, 58 reptile, and 24 amphibian species (SFWMD 2010); among the observed wildlife, 35 species are classified as endangered, threatened, or species of special concern. These species include but are not limited to the gopher tortoise, bluetailed mole skink, Florida sand skink, Florida pine snake, short-tailed snake, Eastern indigo snake, Florida panther, Florida mouse, Sherman's fox squirrels, Audubon's crested caracara, Florida burrowing owl, Florida scrub-jay, Florida grasshopper sparrow, red-cockaded woodpecker, reddish egret, least tern, roseate spoonbill, Everglade snail kite, Florida sandhill crane, little blue heron, white ibis, and wood stork. Bald eagles and Florida black bear have also been observed on Reedy Creek and/or Lake Marion Creek. FWC's CLIP data identifies the areas in and around Lake Marion Creek and Reedy Creek as "Priority Wetlands for Listed Species" (Kautz et al. 1994) and as a "Biodiversity Hotspot" (Endries et al. 2009).

The myriad habitat types in Lake Marion Creek and Reedy Creek support a diversity of wildlife, leading SFWMD and FWC to cooperatively manage a portion of Lake Marion Creek (Huckleberry Island/Snell Creek) as a Type I Wildlife Management Area (WMA). The WMA supports a healthy deer population and small game such as quail, dove, rabbit, snipe, and gray squirrel. Feral hog and wild turkey are also present. The WMA is a popular hunting destination. Since 2000-2001, the Lake Marion Creek WMA has provided 11 hunting seasons and approximately 2,500 man-days of hunting pressure for archery, muzzle-loading gun and general gun seasons combined (Myers, FWC, 2013, pers. comm.). Approximately 500 man-days of hunting pressure were recorded for the 2010-2011 season, including wild hog, small game, and spring turkey seasons. In total, FWC administers several hunting seasons in the fall, small game and hog hunts in late winter, and turkey hunts in spring. On-site deer populations were at one time declining as a result of poaching; fortunately, increased management in the WMA has stabilized the deer population. FWC law enforcement also actively patrols the WMA to deter criminal activity, safeguard the public, and protect game and wildlife resources.

SUMICA

The 4,000-acre SUMICA property is located on the northeast shoreline of Lake Weohyakapka (a.k.a., Lake Walk-in-Water) in Polk County. SUMICA is the largest property managed by Polk County's Environmental Lands program, and is situated on the largest water body in Polk County. Eleven distinct natural communities have been described on SUMICA, including mesic and wet flatwoods, depression and basin marshes, baygalls, wet prairies, and upland mixed forests. FWC's CLIP data identifies the areas in and around Lake Marion Creek and Reedy Creek as "Priority Wetlands for Listed Species" (Kautz et al. 1994) and as "Biodiversity Hotspots" (Endries et al. 2009).

Polk County staff maintains an inventory of wildlife species that have been observed within SUMICA. Wildlife observed in the area includes 63 bird, 11 mammal, 28 reptile, and 8 amphibian species. Included in this list are 14 species classified as endangered, threatened, or species of special concern. The list of rare or listed-species include but is not limited to the Florida panther, eastern indigo snake, gopher tortoise, limpkin, little blue heron, tricolored heron, white ibis, Florida sandhill crane and wood stork. Bald eagles and Florida black bear have also been observed on SUMICA.

FWC biologists have helped train county staff at SUMICA to conduct deer surveys; a 2003 survey indicated that SUMICA supported a sizeable deer population. Hunted species such as feral hogs also occur on SUMICA property, where annual hog hunts have occurred since 2004. Recently, SUMICA partnered with the Operation Outdoor Freedom (a.k.a., Wounded Warrior) Program to conduct hunts on the property (Gaye Sharpe, 2013, pers. comm.). The FWC's Aquatic Habitat Restoration and Enhancement Subsection (AHRES) have also supported SUMICA by investing in projects to improve habitat quality along Lake Weohyakapka. Some of the projects include planting native vegetation, muck removal, and vegetation management to obtain a desirable mosaic of native species, increase water flow and exchange, and avoid monocultures. These projects help to improve habitat for fish and wildlife species.

Comments

The SFWMD's Upper Lakes Region includes ecological and public resources that attract wildlife and visitors. For wildlife resources, the Upper Lakes Region offers an extensive mosaic of forested wetlands, river bottom and floodplains, pine flatwoods, hammocks, prairie, and even scrub. These plant communities range from the completely inundated to xeric, offering a variety of conditions for foraging, breeding, nesting and loafing. GIS data by FWC and others suggests that this region is important habitat to many wildlife species, including game species such as deer and listed-species such as the gopher tortoise and Florida sandhill crane. Wildlife observations recorded by staff at SFWMD, Orange County Parks Department, Polk County's Environmental Lands, and FWC confirm that many species of wildlife use and depend on plant communities and habitat in the Upper Lakes Region. The Florida Department of Environmental Protection has also identified the Upper Lakes Region as a Critical Linkage within the Florida Greenways Network (Hector and Wood 2002), representing one of two feasible opportunities to link southwest Florida with west-central Florida and the Big Bend. This linkage is especially

important for maintaining or restoring populations of wide-ranging species like the Florida black bear and Florida panther.

For the public, the Upper Lakes Region provides exceptional wildlife-recreation opportunities such as hunting, angling, and wildlife-viewing. For example, Tibet-Butler Preserve is part of the De Soto Trail and is in the natural attractions cluster of the FWC's Great Florida Birding and Wildlife Trail. The Preserve is also adjacent to and likely benefits from Lake Tibet, which is designated an Outstanding Florida Water because of its "exceptional ecological and recreational significance." Further south, Shingle Creek, Lake Marion Creek and Reedy Creek, and SUMICA offer public use activities similar to the Preserve, including hiking, wildlife-viewing and environmental education. Some of these areas, especially Lake Marion Creek WMA and SUMICA, offer hunting opportunities as well. Together, wildlife-recreation opportunities are important to the public and also an important part of the regional and statewide economy. A 2006 study by the U.S. Fish and Wildlife Service reports that Florida ranks 2nd (to California) in wildlife-based recreation by residents and nonresidents. In 2006, 5.9 million people enjoyed hunting, angling, or wildlife-viewing opportunities in Florida, while generating \$8.1 billion (USFWS 2006).

It should also be noted that Shingle Creek, Lake Marion Creek and Reedy Creek are part of the Kissimmee Chain of Lakes. In addition to forming the headwaters of the Kissimmee-Okeechobee-Everglades watershed system, these creeks are buffered by expansive wetland resources that play a critical role in the region's water supply, flood control, water quality, and wildlife resource functions. The creeks are also popular fishing areas, as is the Kissimmee Chain of Lakes. In fact, FWC has designated several lakes along the Kissimmee Chain as Fish Management Areas (FMA) where FWC administers fishing-related activities and works with local counties to create community-fishing opportunities for the public. Anglers in these FMA's reliably reel in catches of largemouth bass, bluegill, shellcracker and black crappie. The Kissimmee Chain of Lakes fishery is currently valued at 15 – 20 million annually to the local and state economy (Marty Mann, FWC, 2013, pers. comm.).

To support the Kissimmee Chain of Lakes, FWC's IPM Section and AHRES fund, coordinate, and assist in projects that restore, enhance, or conserve aquatic habitat in the Kissimmee Chain and its tributaries. Some of the projects include treatment of invasive/exotic aquatic plants that can reduce public access to the waterway, and removal of floating aquatic plant islands that can cover and degrade fish and wildlife habitat in these waterways. Similar aquatic plant management efforts have taken place in Lake Weohyakapka adjacent to SUMICA and Lake Tibet adjacent to Tibet-Butler Preserve. FWC works diligently with public agencies and stakeholders to provide greater access to these lakes and tributaries, as well as adjacent public conservation areas including Tibet-Butler Preserve, Shingle Creek, Lake Marion Creek and Reedy Creek, and SUMICA. We continue to support efforts that allow and promote public access to lands in the SFWMD's Upper Lakes Region. Each of these areas highlights and supports wildlife resources enjoyed by the public.

We understand the SFWMD is currently assessing Water Management District-owned properties to determine those that are most important to their core mission. We hope SFWMD finds the information we have provided herein useful in that regard. We

appreciate the opportunity to review the 2013 SFWMD Land Assessment process for the Upper Lakes Region and are looking forward to working with the SFWMD throughout review of lands in the other regions. If you need any further assistance, please do not hesitate to contact Jane Chabre either by phone at (850) 410-5367 or at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Ben Shepherd at (407) 304-9311 or by email at Ben.Shepherd@MyFWC.com.

Sincerely,



Scott Sanders, Director
Office of Conservation Planning Services

ss/bs
ENV 1-12-2
Land Assessment of the Upper Lakes Region_17129_021813

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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, 2013

Ray Palmer, Real Estate Section Leader
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33416

Subject: Comprehensive Assessment of District Lands

Dear Mr. Palmer:

The Florida Native Plant Society (Society) appreciates the deliberative process the South Florida Water Management District (District) is undertaking to identify lands appropriate to be sold as surplus. We are generally supportive of your effort to surplus lands that do not advance the District's core mission. However, we do not believe that any of the lands within the Upper Lakes Region should be considered as potentially surplus.

The variety of spatial data available for use by the District to help evaluate the water management and conservation values of the subject properties is extensive. Even though the CLIP data are relatively coarse, they provide an outstanding initial measure of conservation value. However, one of our greatest concerns is that some values may not be receiving sufficient attention. For example, the 16-acre Strip Parcel within the Lake Marion Creek and Reedy Creek Unit may eventually be very important for maintaining connectivity with other conservation lands to the north. It might otherwise be difficult to justify retaining ownership of that parcel. Likewise, the scrub occurrences within the Upper Lakes Region, which clearly have value for the protection of imperiled species, may also have high recharge value. We suggest that your reviews should include CLIP's Ecological Greenway and Recharge data to help gauge site-specific value.

We look forward to continuing participation in the District's review of its lands, and hope you will continue to consider a full range of potentially important conservation values. Thank you for considering our concerns.

Respectfully,

Eugene M. Kelly, Policy Chair
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Policy@fnps.org

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Telephone: 407.862.8172

February 18, 2013

Mr. Ray Palmer
Real Estate Section Leader
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33406

Dear Mr. Palmer:

Thanks to the SFWMD Land Assessment Team for the opportunity to comment. The **"Questions and Answers" for the SFWMD Land Assessment Process** website says it best:

"Why does the South Florida Water Management District (SFWMD) need land? Land is a key component in providing regional flood protection as well as in restoring and sustaining ecosystems from central Florida to the Florida Keys. Water stored on land also seeps into groundwater aquifers, replenishing our drinking water supply. Throughout its six-decade history, the SFWMD has acquired and managed lands for distinct and diverse purposes, including: to build and operate flood control infrastructure and provide for associated system maintenance; to conserve and preserve natural floodplains and environmentally sensitive areas; and to construct large-scale water quality improvement and natural systems restoration projects to restore impaired ecosystems."¹

With land considered key to successful implementation of its core mission to provide for flood protection, ecosystem restoration and aquifer recharge for water supply, the District's history of acquisition, fee and full, has been dedicated to state and regional project support. Furthermore, the development of the Northern Everglades Payment for Ecosystem Services program supporting water storage and agricultural operations is a program supported by various and historically disparate sectors. I can't say enough in support of the NE-PES in terms of cost efficiency, resource effectiveness for storage and some ancillary water quality benefits along with benefits to the general public by assisting in keeping open and working lands intact.

What I can say is that there are major concerns with the timing and scope of the land assessment process in the Upper Kissimmee Basin. District documents state that the "potential alternative uses (of District owned lands) contribute to the agency's core mission of balancing and improving water quality, flood control, natural systems and water supply."² These alternative uses need a comprehensive and thorough examination as to the long-term value that these lands might hold.

¹ http://www.sfwmd.gov/portal/page/portal/xrepository/sfwmd_repository_pdf/q_and_a_land_assessment.pdf

² *ibid*

We are not only facing an influx from our northern neighbors in general but with what seems to be certain inundation by people and increasing marine encroachments to our urbanized coastal regions, the interior of Florida and specifically the metropolitan Orlando area are poised for exponential growth. The following is from the February 1, 2013 meeting of the Central Florida Water Initiative Steering Committee Meeting minutes where Tom Bartol, Chief of the St. Johns District's Bureau of Water Supply and member of the CFWI Regional Water Supply Team, delivered anticipated 2035 future water supply demands of approximately 310 additional MGD over 2010 water use as follows³:

Use	MGD	Approximate % of Demand
Public Water Supply	218	70
Landscape, recreation, aesthetic	32	10
Agriculture	29	9
Commercial, institutional and industrial	22	7
Power Generation	5	2
Domestic Self Supply	4	1

Increase by County	MGD
Orange	116
Osceola	91
Polk	50
Lake	38
Seminole	16

Increase by District	MGD
SJR	136
SF	128
SWF	49

On February 13, 2013, Metro Plan Orlando board approved an amendment⁴ to its 2030 Long Range Transportation Plan that extends two major roadways, the Poinciana Parkway from I-4 south and east to what is the proposed Southport Connector Expressway along the southern shore of Lake Toho and east to Florida's Turnpike and Canoe Creek Road. This road (literally) to nowhere only serves to fragment current

³ http://cfwiwater.com/pdfs/2013_02-01/minutes.pdf. Pgs., 3-4.

⁴ <http://www.metroplanorlando.com/news/transportation-news/public-hearing-set-in-osceola-county-for-proposed-amendment-to-2030-long-range-transportation-plan/>

rangelands that are home to vital wildlife corridors from the Everglades Headwaters Refuge north toward the St. Johns watershed and ultimately to the Ocala National Forest and beyond. With the fairly recent Osceola County mixed use designation that runs from St. Cloud southward to this proposed expressway, exponential growth is practically guaranteed and this highway construction portends major disruption to various natural resources. Construction impacts to wetlands, reduction of aquifer recharge rates due to increases in impervious surface, inevitable changes in topography due to construction engineering, pollution increases due to stormwater runoff in a basin under water quality mandates already behind schedule and additional fragmentation of habitat are all potential impacts from this plan.

Dr. Tom Hoctor of the UF Center for Landscape Conservation Planning has examined the Upper Kissimmee Basin as part of the Critical Lands and Waters Identification Project 2.0 (CLIP) that provides the basis of the FWC Cooperative Conservation Blueprint (CCB) Project. The following is the result of his review of SFWMD lands within the current assessment:

Upper Basin SFWMD Conservation Land Ecological Priority Overlays

1) Florida Ecological Greenways Network (FEGN)

Only Tibet-Butler Preserve (on Butler Chain of Lakes in Orange County) and the Oak Street Extension Preserve on West Lake Toho are NOT in the FEGN.

2) Critical Lands and Waters Identification Project 2.0 (CLIP)

EVERY District land in the Upper Basin region is within either CLIP Priority 1 or Priority 2 (which are the two highest priority levels receiving the most conservation attention).

3) CCB Regional CLIP Priorities

EVERY District land in the Upper Basin region is within either Regional CLIP Priority 1 or Priority 2.

These designations are in addition to and in support of the US Fish and Wildlife Service Strategic Habitat conservation designations that are afforded to these areas. Sustainable and diverse fish and wildlife populations depend on the protection of these lands.

Currently there are several initiatives underway, in addition to the transportation plans above, in the Upper Basin that deal with overall water management and where control of property rights could affect ultimate success for specific projects. The Central Florida Water Supply Initiative, SFWMD efforts to develop water reservations, the Corp's post-construction KRR remodeling effort, the need to comply with the Lake Okeechobee

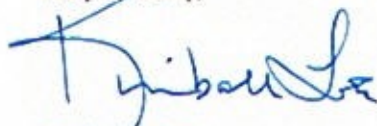
Protection Plan, development of the Everglades Headwaters National Wildlife Refuge and Conservation Area, the imminent initiation of the Lake Okeechobee BMAP process, the Kissimmee Chain of Lakes Long-term Management planning, the Kissimmee Basin MFL development and the DACS BMP projects that Audubon has requested include additional water management provisions.

The success of each of these is dependent on flexibility and interagency collaboration that works to resolve issues of storage and aquifer recharge so crucial to water quality and supply. Divesting hard fought land/easement acquisition at a time when population and water use projections indicate startling potential impacts to the region should be set aside until all these other factors can be considered at the watershed level, not as individual and unrelated projects.

There needs to be leadership at the highest levels of state governance to organize this morass of initiatives and to create a coordinated approach to Everglades restoration that finally begins at the top of the system. SFWMD staff members, under the leadership of Temperince Morgan, did a terrific job in the Lake Okeechobee Technical Plan and were on the path to sensible watershed management when diverted to land acquisition south of Lake Okeechobee. It's time to get back to the effort that will provide landscape scale watershed restoration, protection of conservation and agricultural lands, water quality improvements for the Kissimmee Chain of Lakes, the Kissimmee River, Lake Okeechobee and ultimately the St. Lucie/Caloosahatchee river systems and their estuaries. This is where we need to be focused and it needs to be a coordinated effort starting at the Headwaters of the KOE ecosystem.

Thank you for the opportunity to comment and understand that with these comments, I speak only for myself as a resident and concerned citizen of the Kissimmee Basin.

Respectfully,



Kimball Love
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February 18, 2013

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South Florida Water Management District
561.682.2246
Rpalmer@sfwmd.gov

Re: SFWMD Land Assessment Comments – Upper Lakes Assessment Region

Dear Mr. Palmer,

Defenders of Wildlife appreciates the opportunity to comment on the South Florida Water Management District's Land Assessment process for the Upper Lakes Region. I am not submitting comments on individual properties, beyond what Audubon of Florida submitted, so I am not using the online form as it is not amendable to the overall comments that I am including here. I fully expect that these concerns will be included among the public comments submitted regarding the Upper Lakes Region.

First of all, we endorse and want to reiterate the concerns and analyses submitted by Audubon of Florida for all of the properties under consideration: Tibet Butler Preserve, Shingle Creek, Lake Marion Creek and Reedy Creek and SUMICA (attached with this message). Furthermore, we want to highlight that the vast majority of these properties are part of the Florida Ecological Greenways Network, which identifies opportunities to protect large, intact landscapes important for conserving Florida's biodiversity and ecosystem services.

It is essential to note that every District parcel in the Upper Lakes region is within either Critical Lands and Waters Identification Project (CLIP) Priority 1 or Priority 2, the two highest priority levels for lands that should receive the most conservation attention in the state. CLIP is an identification of those lands and waters in the state that are critical to the conservation of Florida's natural resources. CLIP is a GIS database of statewide conservation priorities for a broad range of natural resources, including biodiversity, landscape function, surface water, groundwater, and marine resources.

And the Cooperative Conservation Blueprint builds upon CLIP that uses science and the best available statewide spatial data to show Florida's critical environmental resources in a database that can be used as a decision-support tool for collaborative statewide and regional conservation and land use planning to envision and ensure the sustainability of Florida's green infrastructure and vital ecosystem services.

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tel 202.682.9400 | fax 202.682.3331

Because of the importance of the Upper Lakes region to overall ecological integrity and wildlife connectivity, we want to encourage the District in its decision making to partner with other land management agencies to ensure that decisions are being made holistically and with all pertinent information available. While water storage, delivery and management may be of paramount interest to the District, many of these lands under review also serve as important wildlife habitat and corridors, and these attributes need to be factored into the land assessment process. Creative and collaborative solutions should be considered, such as conferring lands to other agencies, for example, which are placed to manage wildlife or upland habitats.

After much public input and collaboration with area landowners, the U.S. Fish and Wildlife Service established the Everglades Headwaters National Wildlife Refuge in January 2012 in the region under consideration by the District. As a partner in this effort, the District needs to ensure that any decisions about its holdings in the area do not compromise the potential for achieving the greater mosaic of public and private lands essential to building the refuge.

We also want to ensure that any disposition of District lands will not result in compromising goals for other District holdings. The St. Johns River Water Management District recently adopted language to ensure that any of their surplused lands would not be used in a manner that would be incompatible for what their District is trying to achieve with its other land holdings.

And finally, Defenders encourages the District to make additional opportunities available for public comment and input once it has decided upon a more precise proposal in its lands assessment for the Upper Lakes region.

Thank you for your consideration of Defenders' comments on the Upper Lakes Assessment Region. If you have any questions or need clarification, please do not hesitate to contact me at 727-823-3888.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Fleming".

**Elizabeth Fleming
Florida Representative
Defenders of Wildlife**

February 5, 2013

SFWMD St. Cloud Field Station
3800 Old Canoe Creek Road
St. Cloud, FL 34769

I am writing because I admire and enjoy Florida's unique and irreplaceable environment. I am concerned that the South Florida Water Management District (SFWMD) has embarked on a process to potentially declare some conservation lands as surplus, and subsequently sell or trade them, or dedicate lands to uses other than the conservation purposes for which they were purchased.

Properties being studied for possible surplus declaration include the Lake Tibet-Butler Preserve, the Shingle Creek floodplain properties in Orange County and Osceola County, the Lake Marion Creek and Reedy Creek floodplain tracts in Osceola and Polk Counties, and the SUMICA conservation area in Polk County.

I support all of the listed properties to be retained in public ownership as conservation land; they constitute the true "Headwaters of the Everglades".

Thank you for your consideration. Over six decades, the South Florida Water Management District has wisely acquired nearly 1.5 million acres of land within its 16-county jurisdiction to support flood control infrastructure, protect water resources and restore impaired ecosystems.

Yours truly,



J. Capozzelli
New York

Town of Windermere



February 18, 2013

TO: Mr. Joe Collins, Chair - South Florida Water Management District Governing Board

FROM: Gary Bruhn – Town of Windermere Mayor

RE: UPPER LAKES ASSESSMENT

Dear Mr. Collins,

As the South Florida Water Management District begins its Upper Lakes Assessment, I would like to state that I oppose any efforts to sell or convey the Tibet- Butler Preserve area. As you know, the Butler Chain of Lakes has been designated as an “Outstanding Florida Water” (OFW) by the State Legislature. And with this state designation, the goal is to protect existing water quality and to prevent the lowering of water quality. This preserve is important, not just for water quality, but also for preservation of wildlife.

In general, public lands such as the Preserve are important to hold and maintain for future generations. Although sometimes there are situations where land areas serve no public use, the Preserve is very important, serving both as an area for preservation and public education. I and some of my Town Council members have also completed the public input survey on line.

I thank you for your service on the South Florida Water Management District Governing Board.

Sincerely,

Gary Bruhn
Mayor – Town of Windermere
(407) 876 -1732 or windermeremayor@yahoo.com

C.C. Mr. Daniel O’Keefe
Ms. Cecelia Weaver
Windermere Town Council members

SFWMD Land Assessment Comments- Upper Lakes Assessment Region

Tibet Butler Preserve

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

This 438 Acre tract includes 300+- acres of wetlands which are an important feature of the floodplain of the Butler Chain of Lakes, which is part of the tributary system to the Kissimmee River Watershed. This is one of the larger areas of undisturbed wetlands remaining in existence on this chain of lakes. The property contains 138+- acres of upland habitat which is generally high quality and which has been appropriately developed and managed by Orange County with a trail system facilitating public use for passive recreation, wildlife observation, and nature study. This property is the site of the Vera Carter environmental center, which is a significant environmental education center in Central Florida. This property fulfills flood control, water quality, water supply (through distributed water management characteristics of the wetlands) and natural resource protection elements of the district's core missions.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

This property is currently managed by Orange County under a lease agreement with SFWMD which extends to 2094. The duration of this lease is just short of 100 years, making it nearly tantamount to fee title ownership for Orange County under Florida Law. The district could consider a fee title transfer of this tract to Orange County with appropriate restrictions and a conservation easement limiting the tract to preservation/conservation and nature interpretive uses. If such a transfer is contemplated, there should be an automatic reverter provision returning the title to the district in the event of inappropriate uses in addition to a conservation easement. However, given the long-term lease governing the use of this property, going through the exercise of a title transfer may amount to a "distinction without a difference" and result in unnecessary transactional costs and legal expenses for both Orange County and SFWMD.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

No. This property should either be retained by the district under the current arrangement with Orange County, or transferred to Orange County for the limited purpose of continuing the current preservation/conservation/recreational uses, with a conservation easement and reverter clause operating in favor of the district.

Shingle Creek

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

- (a) Munger Tract – This land is vital to water management, wetlands, and flood control. Were this tract to be developed for residential or commercial purposes, significant additional drainage structures emptying into the SFWMD system would be necessary providing additional flood protection for this area would require sending local storm water downstream during rain events, exacerbating water management problems in the Kissimmee Chain of Lakes area and downstream systems. The tract, as noted in the staff review, has unique ecosystem features and both wetlands and upland ecosystem values. Continuing efforts to consolidate land holdings and apply management to this area is important to all of the core missions of the district.
- (b) Shingle Creek Management Area – This land is highly valuable for water management, wetlands, flood control, further restoration Restoration work completed so far is remarkably successful, and SFWMD managers have brought together an innovative plan and recruited community stakeholders to help complete the restoration. This tract has highly valuable wildlife habitat, and ecosystem features. Continued ownership of this tract is important to all SFWMD core mission components.
- (c) Osceola County Management Unit—All of the land owned by public entities and the mitigation bank within this management unit makes significant contribution to all of the district's core missions. The 70 acre property actually owned in fee simple by SFWMD has high rankings for habitat richness, with the majority in a 7+ species category. The property also has a priority 2 ranking as in the Strategic Habitat Conservation Area system. Its proximity in the mitigation bank adds to the conservation function of both.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

- (a) Munger Tract – While the “checkerboard” of ownership presents management challenges, the district should strive to overcome these challenges through innovative mechanisms rather than considering the property for surplus. It should be a priority for additional purchase when additional land acquisition funds are available. A public-private partnership with a mitigation banking entity might facilitate a mitigation bank being created on the property to take advantage of mitigation potential in the remaining private parcels.
- (b) Shingle Creek Management Area- No. Protecting the corridor matches the core missions of the SFWMD and we believe that use and management should continue as present.
- (c) Osceola County Management Unit - While transfer of the 70 acre parcel to Osceola County, the City of Kissimmee or the mitigation bank, (with conservation easement and reverter provision) may initially appear attractive, we see little value in this exercise unless the county, city or mitigation bank presents a convincing plan to justify such action. Due to the characteristics (largely wetland) and isolation of this 70 acre tract, management activities necessary seem minimal, and the transactional costs of conveying title seem likely to outweigh the benefits of achieving such a transfer.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

No, for the entire Shingle Creek unit. As mentioned for the Munger Tract, securing controlling interest in the lands along this waterway will protect the water resource values of this waterway and watershed in a future of intense regional development and water resource function loss. This area presents one of the best opportunities for a distributed water management approach (fee simple, easements, mitigation, and so on) to provide resource benefits and protections for an imperiled waterway of the Northern Everglades.

Lake Marion Creek and Reedy Creek

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

- (a) Intercession City Assessment Unit – This unit is well suited to further all of the district’s core missions if retained in District ownership. The assessment material shows high quality habitat value and species diversity values for the entire tract. Strategic habitat

conservation value shows priority 2 for the entire tract. Wetlands, floodplain values are very significant.

- (b) Lake Russell and Poinciana Blvd. Tracts – This unit is well suited to further all of the district’s core missions if retained in district ownership. The Poinciana Blvd tract is largely deep cypress swamp associated with Reedy Creek and is generally subject to year round inundation and water movement. The Lake Russell tract contains both creek floodplain and high value uplands including scrub. Strategic habitat conservation value shows priority 2 for the entire tract. High species richness due to scrub. Osceola County Schools environmental center located on the property is a significant community asset. This tract is also a crucial component of the ecosystem that is preserved on the Nature Conservancy’s Disney Wilderness Preserve immediately south of the district lands.
- (c) Huckelberry Island & Snell Creek – This unit is well suited to further all of the district’s core mission goals if retained in district ownership. This tract has both high wildlife habitat and high water resources values, serving as a filtration and nutrient uptake feature in the ecosystem. It also has upland components with high species diversity and ranks priority 2 in the Strategic habitat conservation value matrix.
- (d) Lake Marion Unit – This tract is among the most ecologically diverse in the district’s land inventory and contains very high species richness and habitat values. The scrub ridge with cutthroat seepage slope areas are among Florida’s most rare and most vulnerable habitats. Habitat richness is 7 key species or above for much of the tract and 8-13 species on some of the tract with the tract in its entirety ranking priority 2 on the Strategic habitat Conservation value index. With water resources and wetland components incorporating a major stream system, this tract furthers all of the district’s core mission components.
- (e) Avatar Scrub – This smaller tract is largely scrub uplands with a major seepage slope allowing water recharged into the shallow aquifer to flow overland toward the wetland system and adjacent creeks. This site shows a large percentage of priority 2 rare species habitat ranking. This tract meets district core mission of water quality improvement, Natural Resources Protection and Restoration and water supply through its aquifer storage in summer and base flow during winter months.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

- (a) Intercession City – We do not believe there is a better use of the property for the district’s core missions. The individual parcel assessments of the “6 acre pond” and “16 acre strip” sites reveal that both of these sites have significant water resources value and involvement, and in the case of the “6 acre pond”, very high habitat richness (8-13 species), plus a priority 3 ranking in the rare species habitat category. Rather than being subject to “site preparation for development”, much of the site appears to be a borrow excavation which has created a surface water/wetland interface heavily utilized by wading birds. The narrow “16 acre strip” also shows high habitat richness, with greater than 7 species and up to 8-13 species potential mapped for much of the tract. Development of this tract would require wetlands mitigation and needlessly fragment a wildlife corridor. We do not believe that these two small tracts should be declared surplus because of the significant natural values indicated.
- (b) Lake Russell and Poinciana Blvd. Tracts – We do not believe there is in general any better use of the property to support the District’s Core missions. It is possible that more closely coordinated management of the Lake Russell property with the adjacent Disney Wilderness Preserve property held by the Nature Conservancy would benefit both properties.
- (c) Huckelberry Island & Snell Creek – We recommend no change in the status or management of this tract; it is fulfilling all of the District’s core mission components.
- (d) Lake Marion Unit – We recommend no change in the status or management of this tract; it is fulfilling all of the district’s core mission components.
- (e) Avatar Scrub – We recommend no change in the status of this tract. While there are previous impacts from past development attempts by Avatar and its predecessors, the open areas created have become superior Scrub Jay habitat. SFWMD should assure that an adequate prescribed fire management schedule for this tract will be carried out to retain its scrub characteristics. Seepage slopes on ridges provide optimal water retention during wet periods and base flow during dry periods.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

With regard to all tracts, we do not believe there is a better use of the property in regard to natural resources or public use issues. Indeed, the area is a model of many entities cooperating to manage tracts for overall good, and considering that the SFWMD may derive the most cumulative good for its core agency missions of any entity involved, it would be highly inconsistent to for SFWMD to surplus its lands and responsibilities by withdrawing its partnership and support in this watershed.

SUMICA

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

The SUMICA tract supports achievement of all of the district's core missions, particularly water quality and natural resource protection. This tract has very high ecological diversity values, incorporating lands that are ranked 1 through 3 in Strategic Habitat Conservation value, contains imperiled rare natural communities, and much of the tract is rated at 7 species and 8-13 species in habitat richness value. Most of the property is rated at priority 3 or 4 in the rare species priority index. This is a highly valuable and near pristine tract providing an example of relatively undisturbed native Florida wetlands interfacing in ecotones with other habitat types which are also rarely seen in this condition. This property remains in a mostly undrained condition and thus provides distributed water management characteristics of retaining water during wet periods (reducing downstream surges of (nutrient-carrying) water) and providing base flow during dry periods, thus assisting with flood control, water supply and improved water quality—all without spending additional money for these services through a PES or similar program. These benefits are local, and carry downstream to Okeechobee, the Northern Estuaries and the Everglades.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

In general, No. The description of the property provided states “The area is operated and managed by the Polk County through an agreement with the District”, and “the whole site is managed and operated by Polk County through their Environmental Lands Program”. However, the information provided on the web site does not reveal the duration of this agreement or whether the agreement constitutes a legally binding document such as a lease. Further, the web site does not clarify whether title to the property is jointly held with Polk County, or if Polk owns a portion of the site in fee and the district holds another portion of the site in fee. Finally, it is not clear what the long term management funding commitment from Polk County will be under this arrangement. A possible consideration for the district to undertake would be a more formal long term lease to the county or possibly deeding the property to the county with the district retaining a conservation easement and reverter provision assuring its continued use and management to protect the natural values now present.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

No changes recommended.



February 18, 2013

Ms. Melissa Meeker
Executive Director
South Florida Water Management District
Post Office Box 24680
West Palm Beach, Florida 33416-4680

Subject: Land Assessment Region: Upper Lakes, Shingle Creek Properties (aka Munger Tracts)

Dear Ms. Meeker:

Orange County would like to go on record that we support the South Florida Water Management District (SFWMD) retaining ownership of all of the properties located within Orange County, including specifically Tibet-Butler, and the Shingle Creek Basin, especially those parcels located in the Munger Tract area.

On February 12, 2013, Orange County staff attended the South Florida Water Management District Land assessment meeting held in St. Cloud. The purpose of the meeting was to discuss the Upper Lakes Region. During the meeting, the attendees were provided a brief overview of each area and offered the opportunity to comment.

At the meeting, there was no indication that SFWMD was considering surplusing any of the land within Orange County. If SFWMD decides to surplus any of the lands, even those referred to as the Munger Tract properties within the Shingle Creek Basin, we ask that you delay any final actions until Orange County and SFWMD can discuss and fully explore all of the impacts that may be associated with the surplus of these parcels.

Sincerely,

Ajit Lalchandani
County Administrator

c: Chris Testerman, Assistant County Administrator
Jon V. Weiss, P.E. Director, Community, Environmental and Development Services Department
Lori Cunniff, CEP, CHMM, Deputy Director, Community, Environmental and Development Services Department
Anthony Cotter, Assistant County, County Attorney's Office
Cecilia Weaver, Intergovernmental Coordinator, SFWMD, 1707 Orlando Central Parkway, Suite 200, Orlando, Florida 32809
Ray Palmer, SFWMD, P.O. Box 24680, West Palm Beach, Florida 33416-4680

AJIT LALCHANDANI, County Administrator
201 South Rosalind Avenue ■ Reply To: Post Office Box 1393 ■ Orlando, Florida 32802-1393
Telephone: 407-836-7366 ■ Fax: 407-836-7399
Ajit.Lalchandani@ocfl.net

From: stevediamond@ashtonagency.com

Subject Area: Land Management - Email from Who To Contact Page

Message, Request, Question: Hello. My name is Steve Diamond and I reside on the Tibet Butler Preserve in Windermere, Florida. I have received word that there is a study underway to determine the feasibility of possibly selling certain state lands, including the Tibet Butler Preserve. I want to register my utmost objection to any sale of Tibet Butler Preserve. Windermere has seen explosive growth in the past 10 years with the building of developments, apartments and retail establishments. There is precious little nature land left to enjoy. I would strongly recommend that the Tibet Butler Preserve be kept in it's pristine setting. Respectfully Steve Diamond 8223 Stonemason Court Windermere, FL 34786 407-421-5068.

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Related URL: <https://>

Your Name: Steve Diamond

this report is available online at:
http://conservation.dcp.ufl.edu/Heartland_2060_Ecological_Report_Final.pdf

Heartland Ecological Assessment Report

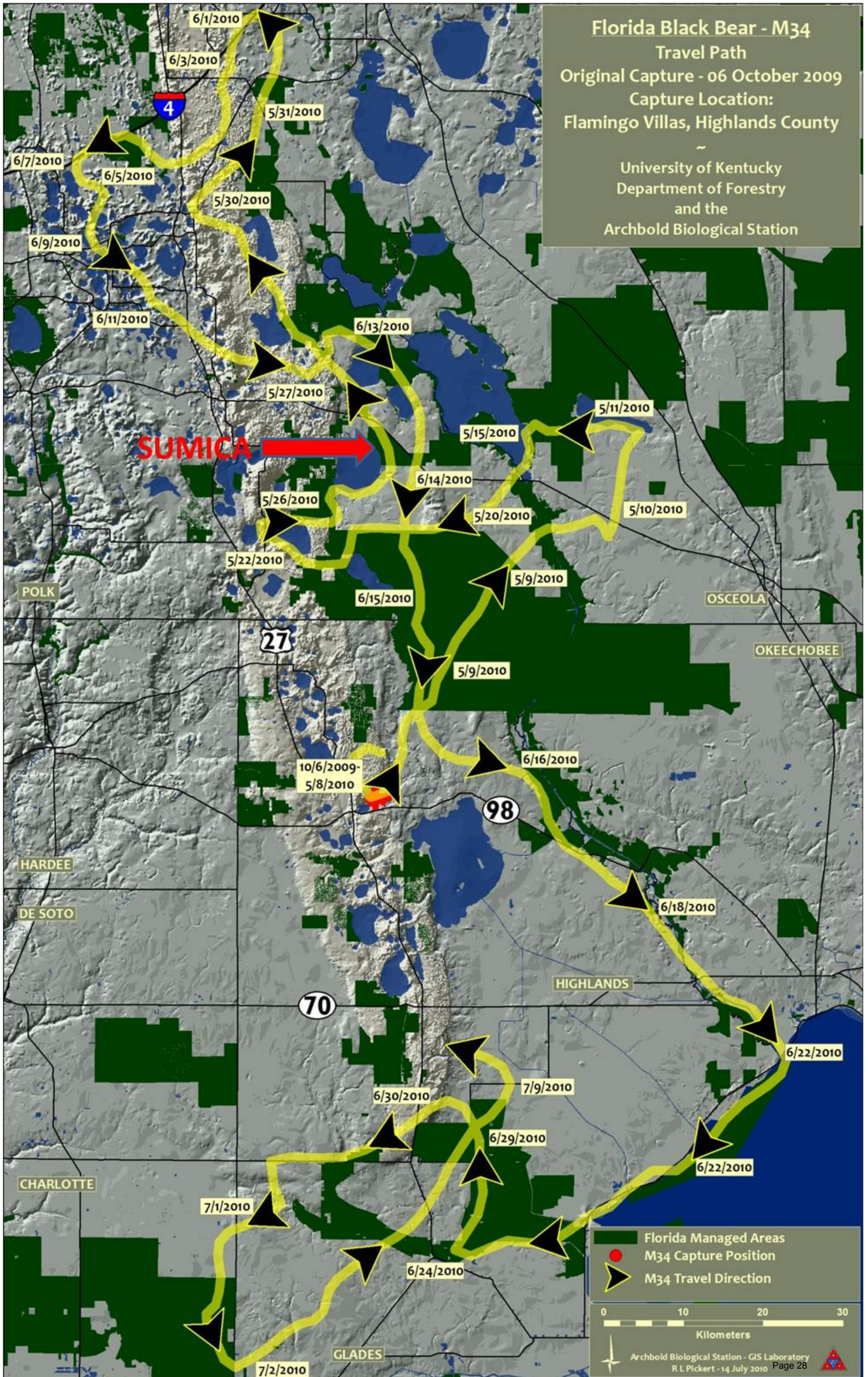
June 2010



photos by Carlton Ward Jr.

Florida Black Bear - M34
Travel Path
 Original Capture - 06 October 2009
 Capture Location:
 Flamingo Villas, Highlands County

University of Kentucky
 Department of Forestry
 and the
 Archbold Biological Station

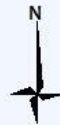


Florida Managed Areas
 M34 Capture Position
 M34 Travel Direction

0 10 20 30
 Kilometers

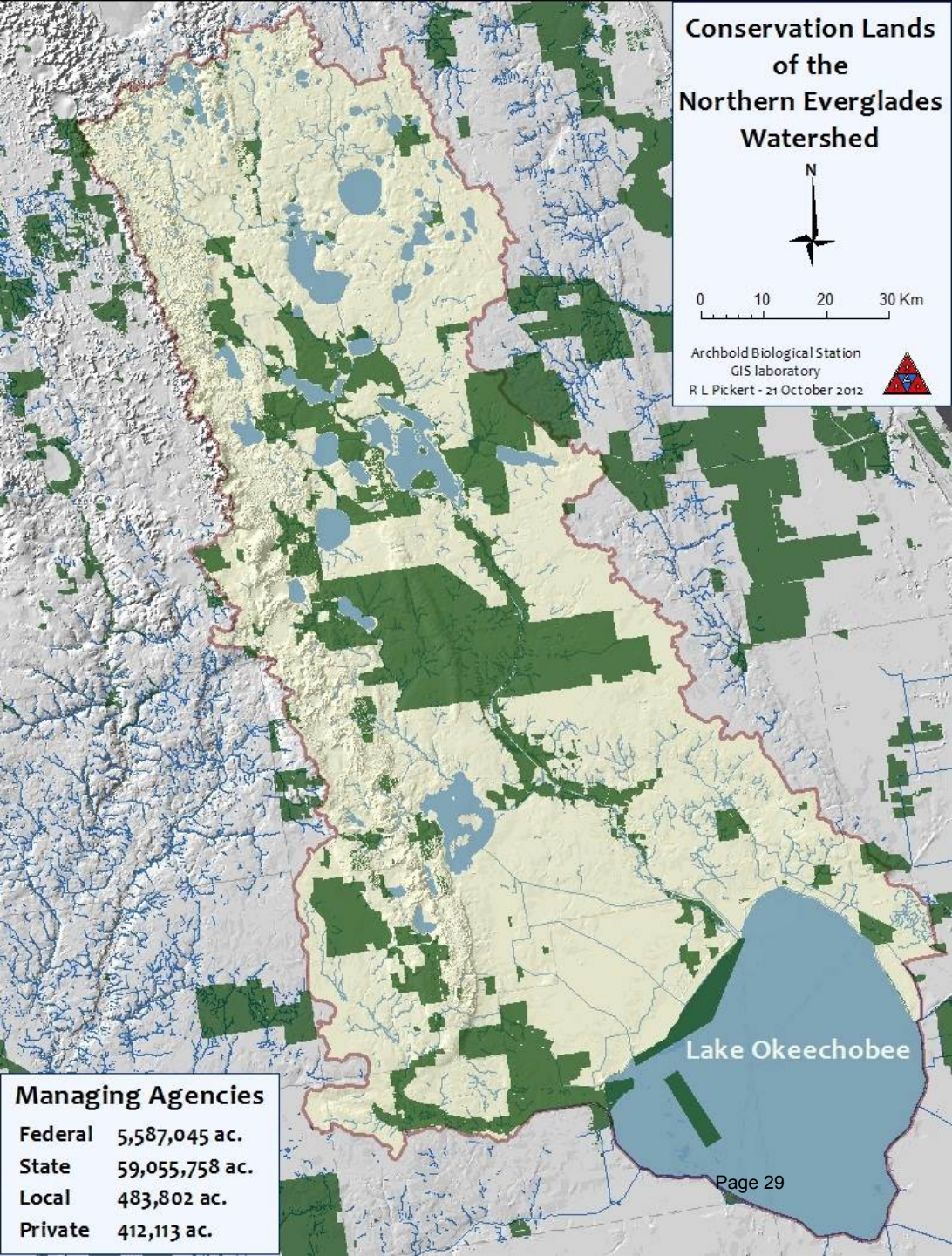
Archbold Biological Station - GIS Laboratory
 R L Pickert - 14 July 2010 Page 28

Conservation Lands of the Northern Everglades Watershed



0 10 20 30 Km

Archbold Biological Station
GIS laboratory
R L Pickert - 21 October 2012

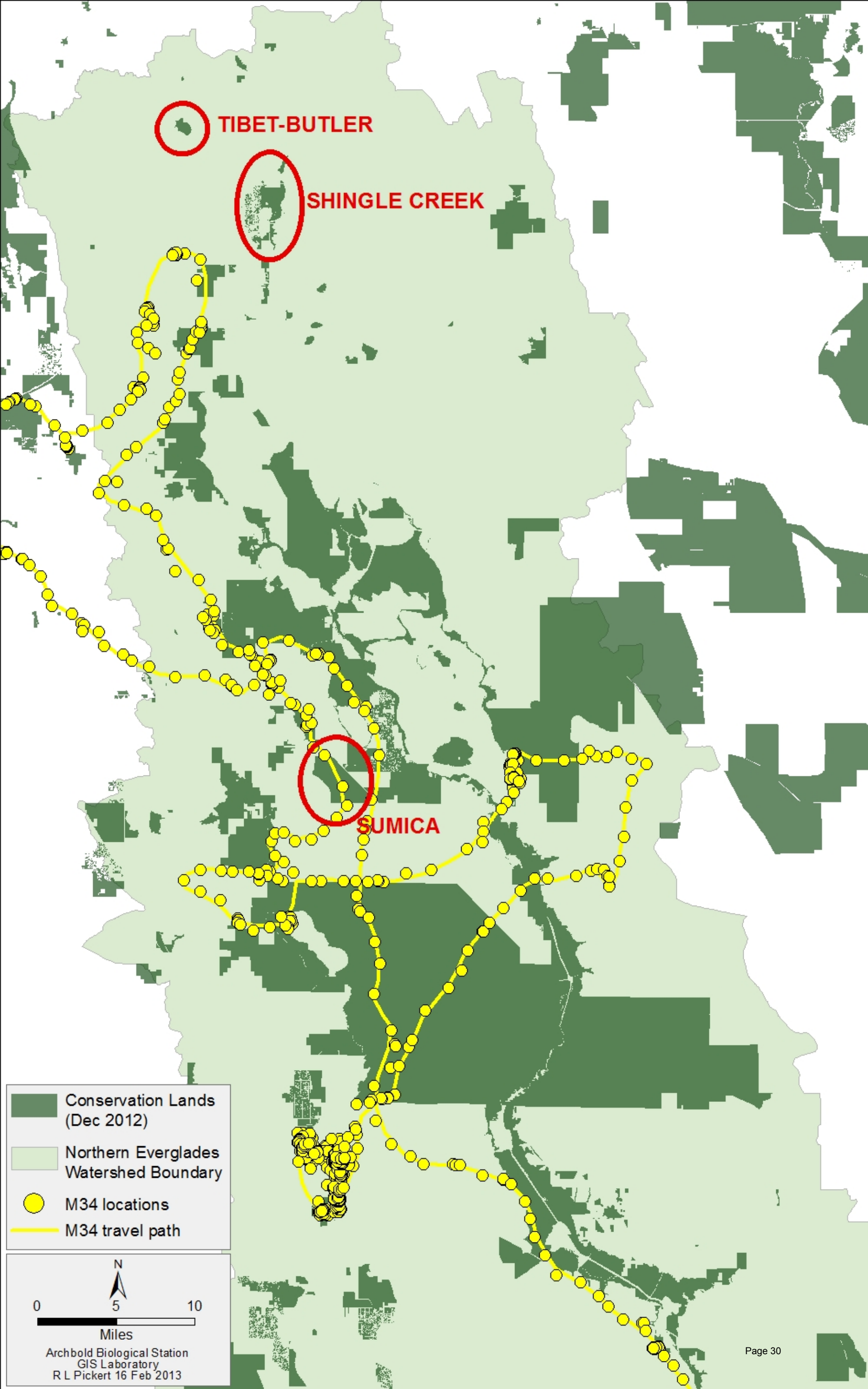


Lake Okeechobee

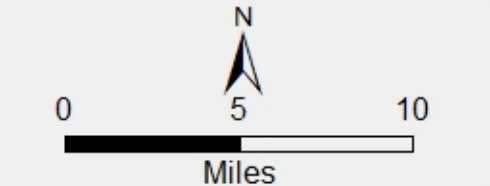
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Managing Agencies

Federal	5,587,045 ac.
State	59,055,758 ac.
Local	483,802 ac.
Private	412,113 ac.



- Conservation Lands (Dec 2012)
- Northern Everglades Watershed Boundary
- M34 locations
- M34 travel path



Archbold Biological Station
GIS Laboratory
R L Pickert 16 Feb 2013

leave the Tibet Butler Preserve alone!!!!!! Please do not even consider taking away this valuable piece of conservation land. It is a valuable in so many ways it has an abundance of wildlife as well as birds. It is a great source of teaching for the younger generations the importance of saving our planet for the future. It is also a great filter with numerous wetlands. This precious body of water was designated an OFW Outstanding Florida Water. This designation was to protect it from GREEDY people who destroy conservation lands. We are continually fighting these developers who are allowed to destroy wetland for GREED. They create Lake front lots that become more valuable as chain lake fronts. These GREEDY people go on and do it over and over. Look at Lk Apopka what a crime to the ecology of what was once a gem, now taxpayers have spent millions trying to re create wetlands to filter. Tibet preserve is the only place left on the Butler chain please do not take this away from us. I can't imagine that it cost very much to operate. I can just see all the hungry GREEDY developer slicking their lips at the thought of diving in with their bulldozers and making millions. Do not touch this very important preserve. We will continue to fight for this precious chain of lakes. I could not be there today but, please notify me when the next meeting is planned so we can all be there.

Sincerely,

Thellie Roper

concerned citizen of the Butler Chain Of Lakes



February 17, 2013

**Florida
Executive Committee**

Debbie Matthews
Chair

Rudy Scheffer
Vice Chair

Deborah Longman-Marien
Secretary

Marti Daltrey

Beverly Griffiths

Tom Larson

Stephen Mahoney

Mr. Ray Palmer, Section Leader
SFWMD, Real Estate

VIA E-mail

Dear Mr. Palmer,

The members of the Sierra Club have a longstanding and deep interest in the District's acquisition and management of conservation lands. We appreciate the opportunity to comment on the Upper Lakes Region properties per your ongoing land assessment.

Tibet Butler Preserve

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

As stated on the SFWMD website, The Tibet Butler Preserve is an oasis for wildlife and nature seekers amidst burgeoning Orlando. The tract features one of the largest wetland areas remaining on the Butler Chain of Lakes which provides headwaters to the Kissimmee. The upland portion of the tract contains very good quality habitat. The current use of the property furthers the District's core missions of flood control, water quality, natural resource protection. The property is managed by Orange County under a lease agreement and has been appropriately developed for passive recreational activities. The Vera Carter Environmental Center provides environmental education opportunities for schools and the community at large.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

No.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

No.

Shingle Creek

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

Munger Tract – is essential to water management and flood control for the area. The District should continue to consolidate its holdings as proper management of this area serves all of its core missions.

Shingle Creek Management Area – serves all of the District's core missions and its value continues to increase with ongoing restoration efforts. The management area also provides high quality habitat in a heavily developed area of greater Orlando.

Osceola County Management Unit – The 70 acre parcel owned by the district in fee ranks very high for habitat quality and significantly enhances the value of the other properties in this unit. The unit serves all of the District's core missions.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

Munger Tract – No, however the District should work alone or in partnership with other entities to acquire the inholdings to further enhance the ecological values of the tract and decrease management challenges.

Shingle Creek Management Area – No

Osceola County Management Unit – No

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

Shingle Creek - No, for this whole unit.

Lake Marion Creek and Reedy Creek

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

Intercession City Assessment Unit – serves all of the District's core missions, has high quality wildlife habitat and species diversity in addition to significant wetland and floodplain values.

Lake Russell and Poinciana Boulevard Tracts – Both serve all of the District’s core missions and are vital links in the riparian corridor that links significant wetland systems through the region. The Lake Russell tract ranks high for species richness due to its floodplain and uplands that contain scrub.

Huckleberry Island & Snell Creek – This tract serves all of the District’s core missions and has both high water resources values and high wildlife habitat ranking due to its upland community.

Lake Marion Unit – This tract serves all of the District’s core missions. It also ranks high in habitat richness due to the rare scrub habitat and seepage slope areas on site.

Avatar Scrub – This scrub upland ranks high in habitat richness due to presence of rare scrub habitat and the large seepage slope. This tract serves all of the District’s core missions.

In your opinion, is there a better use of the property that would provide more effective support for the District’s core missions?

Intercession City – No, and this includes the 6 acre pond and 16 acre strip. Both of these sites have significant water resource value as well have wildlife habitat / corridor value.

Lake Russell and Poinciana Boulevard Tracts – No.

Huckleberry Island & Snell Creek – No.

Lake Marion Unit – No.

Avatar Scrub – No.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

No. In addition, the sum of these tracts provide wildlife habitat & corridors of regional significance.

SUMICA

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

SUMICA serves all of the District’s core missions. It has high quality wildlife habitat and species diversity in addition to its wetland values. It also has significant water storage capacity with distributed water management properties. As stated by District staff, it is an important wildlife corridor link between the Kissimmee Chain of Lakes and the Tiger Creek/Lake Wales Ridge State Forest system to the west.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

No. Polk County manages the property and has an excellent working relationship with the District.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

No.

Thank you for your consideration of our comments. We look forward to continued participation in this process.

Sincerely,



Marian Ryan, Conservation Chair
863-207-5206