



SOUTH FLORIDA WATER MANAGEMENT DISTRICT

November 16, 2015

Dan Ashe, Director
U.S. Fish and Wildlife Service
Main Interior Building
1849 C Street NW, Room 3331
Washington, DC 20240-0001

Subject: Exotic Vegetation Control Loxahatchee National Wildlife Refuge

Dear Mr. Ashe:

Since the early 1990's, an invasive exotic plant, Old World Climbing Fern (*Lygodium microphyllum*), has significantly expanded and increased in density in the Arthur R. Marshall Loxahatchee National Wildlife Refuge (Refuge). Large populations of a second serious invader, Melaleuca (*Melaleuca quinquefolia*), continue to negatively impact wildlife habitat across large portions of the Refuge.

I regret to report that the exotic infestation is not improving at the Refuge despite decades of management efforts. The continued expansion of these two species will lead to the irreversible collapse of hundreds of tree islands, which are critical in Everglades Restoration, and the degradation of wading bird foraging habitat. These impacts could be far greater than those attributable to water quality concerns in the Refuge that are successfully being addressed.

This is an urgent appeal for the U.S. Fish and Wildlife Service (Service) to take action. As you know, the Refuge is located within Water Conservation Area 1 (WCA-1) in western Palm Beach County, Florida. The South Florida Water Management District (SFWMD) owns the land interests in WCA-1 and entered into a License Agreement (License) with the Service, dated July 1, 2002. Under the License, the Service agreed to meet actionable performance measures with respect to exotic plant control. The Service is required to achieve and sustain maintenance control of *Lygodium* and *Melaleuca* by 2017.

Prior to entering into the License, the Governing Board of the SFWMD raised serious concerns about the Service's resources to manage the exotic plant species on the 143,000-acre Refuge. Representatives of your agency assured SFWMD that every effort would be made to meet the License's performance measures.

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Since then, Service annual funding for the exotic plant control program has been inconstant and insufficient to achieve the maintenance control requirement. A more aggressive plan and dedicated funding are required if there is any hope of getting the exotic infestation under control. Sustained funds in the amount of \$5 million per year for five years of aggressive treatments are required to achieve initial control Refuge-wide. Then, an estimated \$2-3 million per year is required to complete follow-up treatments in order to control exotics at the maintenance level.

We cannot stress enough the critical need for the Service to obtain adequate funding to address this dire problem. If SFWMD cannot receive a firm commitment from the Service to adequately fund its exotic control responsibilities, SFWMD will have to evaluate its legal options under the License for non-performance by the Service.

After the funding issue is resolved, we will cooperatively develop with Refuge staff a more precise definition of "maintenance control" and a methodology for accurately monitoring and measuring for maintenance-level control. This would then be incorporated into the performance measures for exotic control in the Refuge.

Again, this is an urgent matter. I look forward to discussing it further. If you have any questions, please call me at (561) 682-6302 or Karen Estock, Division Director, Field Operations and Land Management, at (561) 682-6282.

Sincerely,

Peter Antonacci
Executive Director

PA:cmc

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bc: Cindy Dohner, Regional Director, U.S. FWS
Shannon Estenoz, Office of Everglades Restoration Initiatives, U.S. DOI
Donald Jodrey, Special Assistant, U.S. DOI
Rolf Olson, Project Leader, Loxahatchee NWR
David Viker, Regional Chief, U.S. FWS
SFWMD Governing Board Members



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



In Reply Refer To:
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Mr. Peter Antonacci
Executive Director
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33416

Dear Mr. Antonacci:

Thank you for your letter of November 16, 2015, regarding exotic plant control at the Arthur R. Marshall Loxahatchee National Wildlife Refuge (Loxahatchee NWR). The U.S. Fish and Wildlife Service (Service) is grateful for your partnership and our commitment to control exotics remains strong. Loxahatchee NWR remains our shared jewel in the imperiled Everglades, essential for an array of wildlife in a unique habitat found nowhere else in the world.

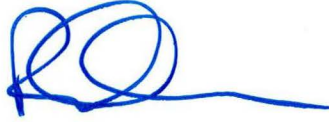
The 2002 License Agreement (Agreement) with the South Florida Water Management District (SFWMD) includes 13 performance measures of which 12-1/2 of the performance measures has been met. The Agreement requires that Australian pine, Brazilian pepper, Old World climbing fern (lygodium), and melaleuca be in maintenance control by 2017. Since November 2014, we have acknowledged that we will be unable to meet the 2017 deadline for having lygodium and melaleuca in maintenance control.

The Service's base funding of approximately \$890,000 per year was not meeting this challenge. In 2015, the National Wildlife Refuge System's (of 563 Refuges) Wildlife and Habitat Management account received only a \$500,000 increase in funding for the entire nation, yet half the increase (\$250,000) was directed to Loxahatchee NWR for exotic plant control. In 2016, the Service's Southeast Region made the difficult decision to leave \$500,000 worth of positions vacant at other Refuges to help address exotics at Loxahatchee NWR. Therefore, in 2016, Loxahatchee NWR is expecting a base budget for exotics management of \$1.64 million. Loxahatchee NWR's increases combined with \$2 million that the Florida Fish and Wildlife Conservation Commission (FWC) have committed, will provide \$3.64 million. This amount still falls short of the generally accepted need of \$5 million for five years followed by \$3 million annually thereafter for maintenance control. The Service will continue to evaluate this need in the context of all other priorities of development of outyear budgets.

The Service's Regional leadership for the National Wildlife Refuge System has begun to meet regularly with your senior SFWMD staff to increase communication, coordinate efforts, and seek new ways to collaborate with others on management strategies and new funding possibilities.

The Service's Regional leadership and Refuge Manager, Mr. Rolf Olson, are available to provide regular updates to the SFWMD Governing Board as requested. If you have any further questions, please feel free to contact me personally or have your staff contact the Service's Southeast Regional Director, Ms. Cynthia Dohner, at (404) 679-4000.

Sincerely,



Acting

DIRECTOR