

May 23, 2006

Ms. Cher King
Senior Acquisition Review Agent
Bureau of Public Land Administration
3900 Commonwealth Blvd., MS 130
Tallahassee, FL 32399-3000

Dear Ms. King:

Audubon of Florida has long been a supporter of conservation land acquisition and has championed creative land deals that ultimately result in a net gain for conservation. However, we do not believe that the current proposal by the Polk Community College (PCC) District Board of Trustees to exchange a portion of the Hilochee WMA Osprey Unit for other acreage in the Green Swamp Area of Critical State Concern presents such a “net gain” opportunity. For this reason, *we oppose this transfer and request that the Division of State Lands reject the Board’s land exchange request.* Specifically:

- (1) While the exchange parcels have greater acreage than the portion of Osprey Unit that would be developed, they do not have a comparable market value. The Osprey Unit acreage is not only valuable ecologically, but it is also valuable commercially: it is comprised almost entirely of uplands, has paved road access, and is located adjacent to the intersection of I-4 and US 27. This proposed exchange would shortchange the people of Florida by not considering the market value of the parcels.
- (2) The proposed PCC campus site is predominantly conserved uplands, a rare commodity in increasingly developed Central Florida. An exchange of uplands for uplands might be more suitable, but the tracts offered in this exchange are both predominantly wetlands.
- (3) While the Osprey Unit may currently represent a disturbed upland, the State’s vision for this property is restoration. Development of the proposed PCC campus would impair the Florida Fish and Wildlife Conservation Commission’s access to the larger property and accordingly their ability to restore it.
- (4) Similarly, the two alternative parcels to be exchanged for the PCC campus site would be difficult to manage. One is so inaccessible FWC had trouble accessing it for resource assessment. Both are not adjacent to Hilochee WMA, nor are they identified as desirable acquisitions in the WMA’s Optimum Planning Boundary. Ultimately, neither would be more than an isolated outparcel, difficult to manage ecologically and inaccessible to public use.

- (5) The integrity of the parcels identified by PCC for exchange will likely decline in coming years as the donor and adjacent landowner, Rinker Materials, anticipates mining the adjacent properties. This will irrevocably impact the health of the wetlands gained by the state in this exchange. If the impending decline of these properties' ecological condition can be foreseen, we do not think their ecological value to the state can be judged solely on their current condition.

In summary, Audubon of Florida does not feel this proposed exchange is in the interest of the people of Florida. While providing educational resources in ever-expanding Central Florida is a pressing concern, so too are the preservation and restoration of our conservation lands. *We urge you to deny this proposal to exchange portions of Hilochee WMA's Osprey Unit for parcels of lesser ecological and economic value.*

Sincerely,

Eric Draper
Deputy Director for Policy
Audubon of Florida