

January 26, 2011

Cheri M. Ehrhardt, AICP  
Everglades Headwaters Proposal  
U.S. Fish & Wildlife Service  
PO Box 2683  
Titusville, FL 32781-2683

**Re:** Everglades Headwaters Proposal – New National Wildlife Refuge and Conservation Area

Dear Cheri M. Ehrhardt:

1000 Friends of Florida is a statewide nonprofit organization that promotes healthy urban and natural places by wise management of growth and change. We educate, advocate, and negotiate to protect our high quality of life here in Florida. We help citizens and professionals have the technical knowledge and access needed to ensure that public and private decisions lead to livable communities and the protection of our shared natural resources.

1000 Friends complements the FWS and the other federal, state and local public and private partners involved in this important and forward thinking initiative aimed at preserving rural working landscapes and protecting and restoring ecosystem services. As noted the proposal is biologically based, targeting the cooperative conservation of an important Florida landscape, supporting various conservation plans and initiatives, and protecting, restoring, and conserving habitat for at least 88 Federal- and State-listed species and species designated by the State of Florida as Species of Greatest Conservation Need. The Upper Everglades landscape is one of the great grassland and wetland areas of North America and vital to the long-term health and sustainability of wildlife such as the Florida panther, Sand Hill Crane, Everglades Kite, Florida Crested Caracara, Florida black bear and many other species.

1000 Friends of Florida support the three study areas that have been defined within the greater Everglades landscape: (1) the Everglades headwaters area, (2) the Fisheating Creek area, and (3) the area around Florida Panther NWR and the Caloosahatchee River. We suspect that the described approach of working with willing landowners to acquire, up to 50,000 acres through fee title purchases, leases, conservation easements, conservation and mitigation banks, lands set aside through habitat conservation plans, and/or cooperative agreements from willing sellers will prove over the long-term the most economically efficient. The proposed approach seems to be fostering recognition of the high value of rural land for rural enterprises, rural culture, natural wildlife conservation opportunities and ecosystem services inherent to these landscapes. The proposed approach furthers the [Comprehensive Everglades Restoration Program \(CERP\)](#) and the Lake Okeechobee Protection Plan (LOPP) move in the direction of utilizing the inherent water storage, attenuation and treatment potential of the Northern Everglades landscape as a means to achieve the ecological goals of Everglades/Okeechobee restoration.

In addition, 1000 Friends of Florida suggests that the Everglades Headwaters Proposal will provide an example to the rest of the nation of the successful use and demonstration of the evolving conservation strategies such as Payments for Ecosystem Services (PES), “Dispersed” Water Management to maintain, restore and enhance the ecosystem services of the natural landscape (See the attached box with further explanations of these terms). Our organization with the help of other professionals has just completed an in-depth article on these conservation strategies which can be viewed at: <http://www.1000fof.org/PUBS/Fl-working-landscapesFinal2011.pdf>. In addition, in the larger context of wildlife and habitat conservation, human recreation and economic development, the Everglades Headwaters Proposal moves to further the development of a regional and even statewide greenway system. 1000 Friends, Doug Alderson of the FDEP office of Greenways and Trails and others also recently completed an article addressing the prospects and benefits of such greenway linkages (see: <http://www.1000fof.org/PUBS/EcologicalGreenwaysFinalVersion.pdf>).

We are unable to attend the first public comment meeting in Kissimmee but hope to attend another, possibly the Sebring meeting. Regarding the proposed boundary for the new National Wildlife Refuge and Conservation Area, we suggest that it should consider inclusion of the lands in the northeast portion of the Kissimmee River basin presently under the ownership of Farmland Reserve, Inc. (otherwise known as Deseret Ranch). These lands represent an important part of the headwaters areas that are experiencing development pressure.

In summary, 1000 Friends of Florida supports the creation of the Everglades Headwaters – National Wildlife Refuge and Conservation Area and looks forward to assisting overtime with the development and implementation of the effort. If you have any questions regarding these comments please contact me at (850) 222-6277 (ext. 103) or at [cpattison@1000fof.org](mailto:cpattison@1000fof.org).

Sincerely,



Charles G. Pattison, FAICP  
President, 1000 Friends of Florida

Cc:

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**Ecosystem Services** - An ecosystem is a biological environment consisting of all the organisms living in a particular area, as well as all the nonliving, physical components of the environment with which the organisms interact, such as air, soil, water, and sunlight. It includes human working rural lands and developed areas. Ecosystem services are the benefits people obtain from [ecosystems](#). They are components of nature, directly enjoyed, consumed, or used to yield human well-being. Examples of services include:

- regulating (climate, floods, nutrient balance, water filtration)
- provisioning (food, medicine, fur)
- cultural (science, spiritual, ceremonial, recreation, aesthetic)
- supporting (nutrient cycling, photosynthesis, soil formation).
- Ecosystem services naturally provided by areas can range from protecting from flooding, offering pollution control to providing natural “air conditioning” and local climate controls (see [www.floridahabitat.org/wildlife-manual/wildlife-friendly-communities](http://www.floridahabitat.org/wildlife-manual/wildlife-friendly-communities) for a more thorough description). They are often inherent in the natural landscape and often undervalued and subject to loss or degradation.

**Payments for Ecosystem Services (PES), also known as Payments for Environmental Services (or Benefits)** broadly defined, is the practice of offering incentives to farmers, ranchers or landowners in exchange for managing their land to provide or maintain ecological service. These programs promote the conservation of natural resources in the marketplace and can help rural landowners have another source of income to maintain their properties through good production years or bad. PES programs are voluntary and mutually beneficial contracts between consumers of ecosystem services and the suppliers of these services. The landowner holds the property rights over an environmental good that provides a flow of benefits to the demanding party in return for some monetary compensation. The consumers of the ecosystem services are willing to offer to the service providers a payment that is greater than the cost of providing the services.

**“Distributed” or “Dispersed” Water Management** - Describe landscape-level water management methods typically consisting of new or revamped water control structures in existing ditches and canals that are currently over-draining the landscape. “Dispersed” water management potentially can store and treat more water on private working lands at much lower cost than sole reliance on large publically funded off-property engineered systems such as reservoirs, massive pump stations and drainage canals. “Dispersed” Water Management is a managed system of smaller dispersed structures within a defined landscape that can restore the hydroperiod of previously drained wetlands, elevate ground water tables to take advantage of storage capacity in aquifers impacted by drainage, and create shallow agricultural impoundments to manage water and re-create wetlands.

Dispersed water management contrasts with the construction of large-scale reservoirs or conventional stormwater treatment areas (STAs) in that the components are much smaller, more numerous, and do not require the permanent acquisition of land to build large public works projects. Dispersed water management can compliment and enhance performance of regional facilities necessary under programs such as CERP. Dispersed water management instead requires a managed and monitored landscape with smaller water control features linked to a system of payments for ecosystem services, or acquisition conservation easements and provision of technical assistance to landowners in exchange for managing their private land (can be on public lands too) to provide or maintain multiple desired ecological services.