



Gopher Tortoise Council
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Dear members of the Suwannee River Water Management District Governing Board,

It is our understanding that the Lands Committee of the Suwannee River Water Management District (SRWMD) Governing Board voted during its March meeting to enter into negotiations with Lee Peanut Farm for a land exchange of +/- 696 acres known as the Ellaville Tract. Such an exchange, as proposed, would potentially allow for the protection of Riverview Farms but would result in negative impacts to the Ellaville Tract. The Gopher Tortoise Council opposes such an exchange as written, and believes there are other options available that better align with the stated purposes of the SRWMD.

The Gopher Tortoise Council (GTC) was formed in 1978 by a group of biologists and citizens concerned with the continual decline of the gopher tortoise and its commensal species. Today, over 200 individuals from 18 states and 3 countries are members. GTC uses a scientific approach to help promote gopher tortoise conservation and to educate others about the role this important species plays in its ecosystem.

The Ellaville Tract contains a robust population of gopher tortoises, representing all age classes; which is critically important to the status of this threatened species in Florida. Furthermore, the Ellaville Tract hosts one of the last viable populations of federally-threatened Eastern indigo snakes in Madison County, Florida. State-listed Florida pine snake, Southern hognose snake, Southern fox squirrel, Bachman's sparrow, Northern bobwhite quail, and many other species occur on the tract. It's a popular wildlife-viewing site as a result, with over 95 bird species documented on eBird by visiting birders.

The diversity of the site is driven not by the amount of merchantable timber on the site, as the agenda from the Lands Committee suggests, but by its groundcover. The Florida Forest Service and the SRWMD have invested tens of thousands of taxpayer dollars into managing the site through forest thinning and prescribed fire. These efforts have promoted the intact groundcover that, in turn, supports the large number of rare wildlife species on the property. The staff time and land management expenditures that have gone into managing this property, coupled with the initial acquisition expenditure that also relied on taxpayer dollars, should be carefully considered when entertaining this exchange.

The SRWMD was established to protect the water resources of the Suwannee River watershed. Though the SRWMD's own maps highlight that 100% of the Ellaville Tract provides spring recharge, this exchange would replace the potential for such recharge with a farm that requires a great deal of water. While Lee Peanut Farms has done an admirable job implementing water-friendly practices, thanks to subsidies provided in part by the SRWMD, it is tough to argue on a scientific basis that a peanut farm would provide stronger water quantity protections than natural uplands.

Probably the best reason for reconsidering this land exchange relates to the justification used for it. Highlighting the lack of merchantable slash pine, a species planted on site intentionally for timber production, should not be a valid reason for converting natural land into an agricultural operation. Storms regularly strike the Big Bend of Florida and these natural disturbances, while destructive in the short term, create ecological benefits in the long-term. The loss of timber from such a storm should be expected and accounted for in the management plan required for the property. Furthermore, the lack of merchantable slash pines has no bearing on the health of groundcover, the species found within the property, or its water quantity benefits. If the SRWMD was established to be a timber merchant, such justification would be logical. However, the SRWMD was not established for that purpose. As such, it is puzzling why the quantity of merchantable timber would have an impact on its status as conservation land.

The opportunity to protect Riverview Farms, a property with old-growth longleaf pine, healthy groundcover, and several rare species should absolutely be pursued. The proximity of the property to the SRWMD's Quail Farms Tract only adds to that rationale. Riverview Farms can be conserved simultaneous with continued ownership of the Ellaville Tract, however. If the SRWMD is not in a position to cover the acquisition cost, partner organizations can be contacted to pursue Florida Forever, Rural and Family Lands, Forest Legacy, or other funding sources. This does not have to be an "either/or" situation, and a positive scenario for all parties involved is possible with creativity and partnership. Lee Peanut Farms can expand to other lands that aren't intended for conservation, if they so desire. That is routine for private businesses wishing to expand their operations.

The Gopher Tortoise Council respectfully requests that the SRWMD keep the Ellaville Tract as a conservation property and pursue other methods for ensuring that Riverview Farms gets protected and that Lee Peanut Farms has their needs met. If this can not be done, perpetual legal restrictions should be placed upon the Ellaville Tract to protect its conservation values as much as possible.

The SRWMD has done an admirable job of managing tens of thousands of acres and managing the interests of many stakeholders. We appreciate the work the SRWMD has done to protect and manage land that supports gopher tortoise habitat, lands for the public to enjoy, and lands that support stated water quality goals. It is our hope that the mission of SRWMD can be brought back into focus upon further consideration of this land swap opportunity.

Thank you for your careful consideration and please let us know if the Gopher Tortoise Council can provide any additional information that would aid the Governing Board and staff during the decision-making process.

Sincerely,
Kim Sash

Kim Sash
Sr. Co-chair, Gopher Tortoise Council