

October 2, 2024

Rick Dolan, Director
Florida Forest Service
3125 Conner Boulevard
Tallahassee, Florida 32399-1650
Via email at Richard.Dolan@fdacs.gov

RE: Opposition to proposed swap of 324-acres of the Withlacoochee State Forest (WSF)

Dear Director Dolan:

We, the undersigned sixty-seven (67) organizations and businesses, vehemently oppose the proposal to declare as surplus a 324-acre parcel of land in the Withlacoochee State Forest (WSF) in order to facilitate a swap of the parcel for a privately owned 860-acre stand of pine plantation (Jtmr Timber parcel) in Levy County.

Our attention is directed to you, because the Governor's and Cabinet's June 12, 2024 decision related to the Cabot Citrus OpCo LLC proposal is not the final word; it is in the power of the Florida Forest Service (FFS) to stop it before it is taken up by the Acquisition and Restoration Council (ARC).

Our partners at [Florida Native Plant Society \(FNPS\)](#) have determined the parcel has substantial conservation value and therefore does not qualify to be declared surplus pursuant to [§253.0341\(1\), F.S.](#) FNPS also determined the proposed exchange would not result in a net conservation benefit. If the FFS review includes the same level of scrutiny—field visits and a review of the Florida Forever Conservation Needs Assessment spatial data maintained by the Florida Natural Areas Inventory (FNAI)—we know you will come to the same conclusion. There is no doubt that this swap proposal should be rejected when [contiguity with other publicly owned conservation land](#), [significant habitat connectivity within the Florida Wildlife Corridor](#), overlap with the [sandhill component of Under-represented Natural Communities data](#), [High \(Priority 1\) recharge value](#), and the protection of endangered species are taken into account.

Moreover, the Florida public's recent overwhelming display of across-the-political-spectrum-outrage over development within state parks should signal that this type of proposal is anathema to our collective dedication to protecting Florida's wild places from development.

Please stop this ill-conceived proposal now by making it clear FFS will not support it.

Sincerely,

Adventure Coast Group, Sierra Club

Tom St. Clair, Conservation Chair

Ancient Islands Group, Sierra Club

Tom Palmer, Chair

Apalachee Audubon Society

Kathleen Carr, President

Apalachicola Riverkeeper

Susan Anderson, Executive Director

Avian Research and Conservation Institute

Kenneth D. Meyer, PhD., Executive Director and Senior Research Ecologist

Bear Warriors United

Katrina R. Shadix, Executive Director

Broward Group, Sierra Club

Leah Weisburd, Chair

Cactus Island Nursery

James Freeman, Owner

Calusa Group, Sierra Club

Rhonda Roff, Conservation Chair

Calusa Waterkeeper

Captain Codty Pierce, Waterkeeper

Cape Coral Wildlife Trust, Inc.

Lori Haus-Bulcock, Board of Directors

Center for Biological Diversity

Ragan Whitlock, Staff Attorney

Coastal Plains Institute

Ryan C. Means, President

Creative Environmental Solutions, Inc.

George Foster, Owner

Dixie Crossroads Seafood Restaurant

Laurilee Thompson, Co-owner

Earth Ethics, Inc.

Mary Gutierrez, Executive Director

Earthjustice

Alisa Coe, Deputy Managing Attorney, Florida Office

Environmental Confederation of Southwest Florida

Becky Ayech, President

Environmental Matters Contracting & Consulting, LLC

Pauline Irene Stacey, President/CEO

FL National Organization for Women (FL NOW)

Debbie Deland, President

Florida Birding and Nature Festival

Joe Guidry, Vice President

Florida Defenders of the Environment

Jim Gross, Executive Director

Florida Ecotours Weeki Wachee LLC dba Get Up and Go Kayaking Weeki Wachee

Taylor Masnjak, Owner/Operator

Florida Keys Chapter of the Izaak Walton League of America

Michael F. Chenoweth, President

Florida Ornithological Society

Ann Paul, President

Florida Rights of Nature Network

Joseph Bonasia, Chair

Florida's Right to Clean Water

Capt. Karl R. Deigert, PAC Chairman

Food & Water Watch

Brooke Ward, Senior Florida Organizer

Friends of Etna Turpentine Camp, Inc.

Robert F. Roscow, President

Friends of Split Oak Forest

Valerie Anderson, President

Friends of the Hillsborough River

Phil Compton, Chair

Friends of the Pelicans, Inc.

Jeanette Edwards, Founder/CEO

Friends of the Polk County Parks Foundation

Marian Ryan, President

Gopher Tortoise Council

Eric Sievers, Senior Co-Chair

Greater Orlando National Organization for Women (Greater Orlando NOW)

Penelope Canan, Climate Justice Chair

Healthy Gulf

Martha Collins, Executive Director

Homosassa River Alliance

Brad Rimbey, Vice President

Humane Society of the United States

Kate MacFall, FL State Director

Hundred Acre Hollows

Tom Unrath, President

Kissimmee Waterkeeper

John Capece, Waterkeeper

Labor Community Alliance of South Florida

Lorenzo Canizares, Co-Coordinator

Loxahatchee Group, Sierra Club

Linda Smithe, Chair

Martin County Conservation Alliance

Donna Melzer, Chair

Matanzas Riverkeeper

Jen Lomberg, Esq., Executive Director & Riverkeeper

Merritt Island Wildlife Association

Charlie Venuto, President

Miakka Community Club

Cathy Lewis, Vice President

Moms in Nature's Defense

Catalina Lemaitre, Founder

National Wildlife Federation

Joe Murphy, Wildlife Policy Specialist, Gulf of Mexico Program

Nature Coast Conservation, Inc.

DeeVon Quirolo, President

Our Santa Fe River, Inc.

Joanne Tremblay, President

People Power United

Laurie Woodward Garcia, Leader

Polk Clean Energy Alliance

Katherine Sutherland

Progress Florida

Mark Ferrulo, Executive Director

Residents United for Rural Levy (RURL)

Laura Catlow

Sanibel-Captiva Conservation Foundation

James Evans, CEO

Save the Manatee Club

Beth Brady, Senior Science and Conservation Associate

Sea Turtle Conservancy

Stacey Gallagher, Policy Coordinator

Sierra Club Florida

Susannah Randolph, Chapter Director

Speak Up Wekiva, Inc.

Chuck O'Neal, President

Stone Crab Alliance

Karen Dwyer, Ph.D., Co-founder

Suwannee-St. Johns Group, Sierra Club

Maryvonne Devensky, Executive Committee Chair

Tampa Audubon Society

Mary Keith, PhD, Conservation Chair

Thaell & Associates Property Management, LLC

Cliff Thaell, Senior Partner

The Downriver Project

Gil Damon, Director

The Paper Bear Inc.

Arix Zalace, President and Co-Founder

Volusia-Flagler Group, Sierra Club

Steve Wonderly, Chair

WWALS Watershed Coalition

John S. Quarterman, Suwannee Riverkeeper

cc: Wilton Simpson, Florida Commissioner of Agriculture, Wilton.Simpson@fdacs.gov