



4500 Biscayne Blvd.  
Suite 205  
Miami, FL 33137  
305-371-6399  
fl.audubon.org

August 12, 2016

Daniel O'Keefe  
Governing Board Chair  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, FL 33406

Dear Chairman O'Keefe:

This follows up on my August 11 comments to the Governing Board about the decision to issue a notice of default and begin the process of revoking the lease agreement between the South Florida Water Management District (District) and the U.S. Fish & Wildlife Service (USFWS) on the Arthur R. Marshall Loxahatchee National Wildlife Refuge (LNWR). If the goal is to improve management of invasive exotic plants, then this leverage is misdirected.

There is no doubt a crisis of Lygodium and other invasive exotics on public and private lands, including the LNWR. The answer would be marshalling the financial resources for eradication and management. The threat to revoke the lease is unlikely to eliminate Congressional antipathy for public lands and make appropriators more generous.

Additionally, cancelling the lease and shifting responsibility from the USFWS to the District does not by itself solve any problems. We urge you instead to dig into state and District funds and work with the refuge managers and FWC to address the problem. If the District takes back management of the refuge, it will add significant long-term costs to an already strained budget that would far outweigh any short-term financial assistance. Collaboratively sharing resources by contributing additional state funding (while continuing to advocate for additional federal funding) is the path toward a satisfactory resolution.

We appreciate that the state has increased its contribution of funds for exotic removal in recent years. Those funds come in part from voter approved Amendment 1. When the District and FWC act proactively and work together with USFWS, the funding goals needed to perform important work can be met. Fiscal Year 2016 is a prime example of the fruit of this partnership among agencies. The district's investment of an additional \$2,550,000 from FWC, combined with USFWS's \$2,754,628, achieved more than \$5 million to contain invasive exotic species in the Refuge. We believe continuing a collaborative partnership between the state and the federal governments can keep us from arriving at the worst-case scenario – removing the USFWS from the LNWR and the effective loss of the Refuge while the invasive species issues remain.

There is a better way to approach this situation without risking dissolving a partnership that allows both agencies to leverage resources to better manage ecosystem needs. The District could choose to take U.S. Department of Interior's offer to review the target goals of the lease agreement to outline a more realistic containment plan for Melaleuca and Old World climbing fern in the Refuge, as outlined in Dr. Karen Hyun's June 24, 2016 response to Mr. Antonacci's April 15, 2016 letter. The District could also choose to invest in the treatment of these exotic invasive species utilizing their reserves, or ultimately decide against rolling back the millage rates to increase the district's revenue in order to perform this important work. The best way to stand up for the Refuge is by investing in a long-lasting partnership with USFWS with the common goal of containment in the Refuge.

Thank you for your commitment and leadership on Everglades restoration. We strongly urge the District to develop an ongoing collaborative funding partnership with the Refuge.

Sincerely,

Eric Draper

A handwritten signature in blue ink, appearing to read "Eric Draper".

Executive Director  
Audubon Florida