



Audubon FLORIDA

June 7, 2012

Don Quincey, Chairman
Suwannee River Water Management District
9225 CR 49
Live Oak, Florida 32060

1101 Audubon Way
Maitland, Florida 32751
Tel: (407) 539-5700
CELL: (407) 620-5178
email: Chlee2@earthlink.net

RE: Mud Swamp Hunting Lease, Item 26, June 12, 2012 Governing Board Agenda

Dear Chairman Quincey:

Audubon Florida objects to the approval of the proposed private hunting lease on the Mud Swamp tract. Several significant issues of public policy have not been adequately considered in the proposal and evaluation of this lease. If adequately considered, we believe that these public policy issues would appropriately lead to denial of this proposal.

The terms of the proposed lease will exclude all members of the public from any recreational access to most of the 837-acre Mud Swamp tract 365 days of the year, even though hunting activity under the lease will occur during a significantly shorter period of the year.

Excluding public recreational access for private recreational use is an inappropriate public policy decision. Further, recreational hunting would be more appropriately pursued under the management of the Florida Fish and Wildlife Conservation Commission after a determination that hunting is ecologically appropriate at this site.

The amount of revenue raised by the hunting lease (\$16,929) is small, and the terms of the lease place the Suwannee River Water Management District in a disadvantageous financial position.

The proposed lease terms allow the leaseholder to have up to 14 guests on the property each day. The lease terms do not prohibit the leaseholder from charging these "guests" a fee to obtain a "guest pass." This omission in the lease terms would allow (for example) the lessee to advertise for sale the availability of "Private Hunts on Public Land in Florida Never Opened to Hunting Before."

Similar day passes on private hunt lease tracts elsewhere in the Southern United States commonly garner \$250 per day per guest (see Attachment A). Should the lessee establish such a business model, they could expect a windfall profit from the lease of District lands without the District participating in the revenue stream. Guest passes for 14 guests at \$250 each x 50 days of hunting during the year would produce a revenue stream of \$175,000.00 for the lessee; yet the Suwannee River Water Management District would receive only \$16,929 to benefit its land management programs.

This is poor fiscal management. At minimum, the lease should be structured to assure the public that the District participates in any significant profit from the issuance of this lease, and the public is adequately compensated for these lands being removed from public access.

Audubon Florida requests that the Governing Board of the Suwannee River Water Management District reject the proposed lease for the reasons stated above. We believe that the proposal is objectionable for reasons related to public access to public lands and because it does not represent good fiscal management of the district's land assets.

Sincerely,



Charles Lee
Director of Advocacy

CC:

Acting Executive Director

District Board Members

Greg Munson, Florida Department of Environmental Protection

Clay Smallwood, Director, Division of State Lands