

March 15, 2017

Office of Park Planning
Florida Department of Environmental Planning
Division of Recreation and Parks
3900 Commonwealth Boulevard, MS 525
Tallahassee, FL 32399-3000

To the Office of Park Planning:

This letter is from the Conservation Alliance of St. Lucie County. Shari Anker, its president, served on the Advisory Group committee that met on March 7th re: 2016 Unit Management Plan for Savannas Preserve State Park.

As was stated during that meeting and as background, it was through the hard work of the Alliance (CASLC) and notable Martin County residents, Maggy Hurchalla and Dr. Richard Stokes, that the creation of the Savannas (SPSP) was initiated in 1977.

We have organized our comments into three topic areas and ask that you bear with us as we review the Unit Management Plan of 2016 and detail our responses, both in general overview and comments on specific aspects of the Plan.

I. The Big Picture: Florida and its State Park System

A. The human value of our state parks:

1. Florida's rapid population growth and development has resulted in the correspondingly rapid loss of its native Florida beauty along with its healthy and well-functioning ecosystems. For many, our state parks are the only places they can go to experience the "real Florida."
2. Florida's three time Gold-medal-award-winning state park system is a huge tourism draw, both from in-state and out-of-state. Some people desire to reside near state parks.
3. Floridians want to protect even more of their rapidly disappearing special native Florida areas – as evidenced by the more than 70% "Yes" vote for Amendment One (which set aside taxpayer monies to purchase more land to set aside for conservation). One can, with great assurance, make the case that that same percentage of voters do NOT wish to see the already protected parks being used for golf courses, roads and bridges, resource exploitation like timber and other plant harvesting, cattle grazing, etc. We imagine that that same percentage of voters would urge DEP to continue to fully protect its state parks as they exist, and NOT alter the purpose for which they were created in the first place.
4. Many of us who use our state parks experience deep bonding with them; they become part of our personal and community identity. They are the place where we go to rejuvenate from the stresses of our lives, learn about nature

- by actually being immersed within it, overcome “nature deficit disorder,” and most importantly, experience wonder – the joy of discovering our intimate connection with the whole of life as it is represented right here in this park.
5. We urge DEP to recognize and affirm these human values of the state park experience, to understand that that deep bonding means that it must refrain from politically based impulses to incorrectly and inappropriately “monetize” our beloved state parks.

B. Accounting for Uncounted Economic Values of our State Parks

If the current political impulse to monetize our State Parks to what is a deviation from the historical mission of the park system (protection and conservation) is set aside to allow for a bigger picture analysis of the broad benefits that the parks are already providing, we expect that change in perspective would result in a park system that can truly honor its original mandate. DEP would not feel pressured to negotiate away important sections and values of our state parks.

1. Former Bureau Chief of District V, George Jones, states that tourism dollars associated with our state parks is greater than all of the theme parks combined. Those economic benefits accruing to local municipalities and businesses should be included in the accounting ledgers.
2. The DEP must begin to employ “Ecosystem Services Valuation” (ESV) of each of its state parks. We would expect many of the larger units, such as Savannas Preserve State Park, contribute heavily to the good health and function of critically important ecosystems, now increasingly under grave threat due to rapid population growth and development.
 - a. The SPSP is the largest contiguous freshwater marshland ecosystem in the southeast U.S. It parallels the Indian River Lagoon (IRL), and constitutes the longest stretch of perched wetlands in direct proximity to the IRL. Its pristine condition provides water absorption, storage and filtration. Its water seeps naturally into nearby residents’ wells, recharges the aquifer, and the IRL. The non-development of this area has insured clean and abundant water (and local municipalities do not have to pay to create and maintain storm water infrastructure).
 - b. What is the economic value of this clean water that the pristine SPSP provides? Using the methodology of ESV that service of the Savannas freshwater marshland can be given an economic value. For example, what might its economic value to the adjacent cities be?
 - c. Along with clean air, healthy soil, carbon sequestration, habitat for keystone species that enable the ecosystem to function, habitat for listed species increasingly imperiled, etc., every service Savannas provides must be given a fair assessment of its economic value.

- d. There is a growing scientific literature on ESV¹ and we suggest that DEP enable staff to be trained in this new accounting system, and begin granting the “natural capital” found in state parks its due recognition and valuation.
3. In 2017 we are more aware of the better mental health and increase in cognitive capabilities that time in nature provides to humans. We can say with assurance due to the results of numerous studies that that time produces a more peaceful state of mind, increases our problem solving abilities, and extends our cognitive capacities well beyond those developed in the usual classroom and digital learning settings.² Time spent in nature is part of the curriculum in some schools, and could be for schools close to SPSP. WE urge DEP to factor in what formerly would be called “intangibles,” but what now can be measured in the local community.

Thus, tourism dollars, ESV, and the mental health and intelligence of the local populace making use of the SPSP (and indirectly those they interact with) should be counted in the “benefits” side of the accounting ledger.

II. Historic Mission vs. New Political Directive to Allow “Secondary Compatible Uses” in State Parks, beginning with the SPSP

The SPSP was established in 1977. Its designation as a “Preserve” meant that it was of superb ecological significance and value – aesthetically, biologically, and scientifically – and that it was to be *preserved* in the same condition for future generations. The 2003 Unit Management Plan (UMP) states, “For this park, it was determined that no secondary purposes could be accommodated in a manner that would not interfere with the primary purpose of resource-based recreation and conservation.”

That UMP held true to the purpose by which the SPSP was created. The August 2016 UMP does not.

While the new state statute requires an economic analysis of the larger units, it does NOT require the adoption of secondary compatible uses such as timber and sabal palm harvesting, cattle grazing, etc. The CASLC is aware that even under the existing accounting system revenue from the parks is by-and-large paying for the parks. With the addition of a bigger picture analysis just discussed (and other creative strategies) there is no need to alter and degrade well-functioning ecosystems by way of secondary compatible uses or “multiple uses” additions to any parks, but especially in those parks designated as Preserves.

¹ Robert Costanza et al, “The Values of Ecosystem Services and Natural Capital,” *Nature* 387 (May 15, 1997). One of the earliest and most cited analyses, it is a good introduction to ESV.

² Richard Louv, *The Nature Principle: Human Restoration and the End of Nature-Deficit Disorder* (Chapel Hill, NC, Algonquin Books of Chapel Hill, 2011)

In our view, this is a violation of the public trust placed in the state government – that the use by which the taxpayers fund these special places remain true to the original philosophy and mission of their creation.

A, Our response to suggested secondary use and improvements in the UMP:

1. Logging or timber removal from the Savannas Preserves or any other State Preserve is already accomplished on as needed basis by park staff, or coordinated by them. It does not need to be instituted in the UMP as an ongoing objective, which could ultimately result in exploitation of the resource for income. Dying and dead trees provide necessary ecological functions and should remain on site whenever possible to provide food and housing for wildlife, and provide nutrients to the soil as they decompose.
2. Cattle grazing, at the SPSP, even at the disconnected site, is not advisable due to the nutrients from the manure ending up in our already very compromised and nutrient overloaded waterways. It is not clear what this unit was purchased for. Were there plans to restore it to its original ecology and thus qualify it to be considered as a Preserve? Cattle grazing is out of category not only for Preserve State Parks but also for any state park. We consider allowing it to be a slippery slope in which our parks' open space will be offered to the highest bidder. And the original character of the state park would be dramatically altered. Our parks are not farms.
3. The introduction of the apiary industry is also an inappropriate use of SPSP. Our concerns include the transmission of viruses and other diseases to our healthy native bees, and any industrial honeybees escaping their confines can invade and extirpate our species of native bees.
4. Using the SPSP as a site for tortoise relocation is also inadvisable. Up until now it has been the strict policy of SPSP to decline to accept any outside tortoises as they can potentially introduce diseases, and also that the SPSP needs to maintain territory for its existing population. We already have problems with the railroad tracks impeding the mobility of resident tortoises.
5. ADA accessibility at Hawk's Bluff in Jensen Beach cannot be achieved as the area is minute and the terrain is steep. Existing parking along the side of the road is sufficient for the small groups that tour there. Any alteration would destroy too much of the fragile (and beautiful) scrub habitat. Perhaps a video tour could be offered at the education center for those unable to visit.
6. A playground and grill in Jensen Beach Day Area has several drawbacks. The area is frequently burned by SPSP staff, thus compromising its visual appeal. It is hot as there are no mature trees. Any wayward spark from a grill could easily ignite an unintended fire. Numerous local city parks already offer playgrounds.
7. Stabilize roads between the education center and canoe/kayak launch: we caution that no concrete or asphalt or other impervious road should be

used.

B. Other specifics in the UMP:

1. P. 26. We suggest that the burn interval mimic the historic natural fire pattern. We also suggest that not every square inch be burned as some areas such as those surrounded by water or in distinct segregated area would normally escape fire.
2. P. 83. Widening and extension of roads: The CASLC must assert in the strongest possible terms that state parks and especially Preserves are not simply areas in reserve for municipalities to use as their populations grow to build bridges and roads. This is clearly “an incompatible use” of our state parks. Logically, due to rapid population growth and development there is no state park that will escape being in the crosshairs of municipalities hungrily eyeing what looks to them as undeveloped land. The Parks system must insure that our parks are not easy prey.
 - a. With respect to Port St. Lucie wishing to widen Walton Road, please understand that increasing traffic to the fragile 2-lane Indian River Drive is NOT possible. That road is already falling apart, and due to its proximity to the IRL no widening can be done.
 - b. We are well aware of Port St. Lucie’s decades-long desire to build a bridge through the SPSP and over the IRL (which is an Aquatic Preserve) in order to reach Hutchinson Island (which is a narrow stripped barrier island). The terminus on Hutchinson Island is not doable either as that area is susceptible to forming an inlet when a strong storm or hurricane hits. Additionally, factoring in sea level rise makes this undertaking extraordinarily unwise. Recall that it was the CASLC who successfully organized the opposition to the IRL bridge in 1999/2000. A1A on Hutchinson is already congested with its current local resident traffic.
 - c. The Lennard Road extension if planned through the SPSP could also present yet another ‘incompatible use’ for a state park. Every **avoidance** option must be thoroughly evaluated. Minimization or mitigation must never serve as a compromise by which the SPSP is fragmented.
 - d. We ask that DEP preemptively advise Port ST. Lucie and St. Lucie County that these road projects cannot be accomplished within SPSP boundaries. The language in the UMP that mentions “minimization” of impacts should be replaced with **avoidance** of incompatible uses – as the law and the parks’ own rules and guidelines instruct.

III. Speaking of Incompatible Use: the North Fork of the St. Lucie River Buffer Preserve: a Section of the North Fork Property of the SPSP

In the UMP, page 57, under the “Special Natural Features” it states:

*Most of the North Fork proper and a portion of the St. Lucie Estuary are an aquatic preserve and Outstanding Florida Waters. ... The North Fork is a large tributary to the globally recognized Indian River Lagoon, a National Estuary. The Lagoon system contains few large tributary rivers and each is essential to the productivity of the system. The park provides both protection and a **buffer** to naturally filter water and improve water quality entering these waters. The park also provides habitats for many listed organisms and rare species of flora and fauna. These lands represent the last remaining vestiges of floodplain and upland habitats in the area watershed and **therefore are scarce, unique, and irreplaceable.** (Emphases added.)*

We begin this part of our comments with the above quote from DEP, which clearly established the worth and irreplaceability of this area along the North Fork of the St. Lucie River (NFSLR).

As DEP is well aware the taking of what is known as the Halpatiokee Trails section (nearly 50 acres in the area along US1 in Port St. Lucie alone) to build the Crosstown Parkway Bridge has been controversial for decades, the opposition to which is currently led by the Conservation Alliance and the Indian Riverkeeper. We continue to gain support from local, statewide, and national environmental groups, such as:

Audubon Florida
 Florida Native Plant Society
 Florida Wildlife Federation
 Florida Conservation Voters Education Fund
 Florida Conservation Coalition
 Sierra Club Loxahatchee
 Wild Earth Guardians
 Bonefish & Tarpon Trust
 Martin County Conservation Alliance
 Martin County Native Plant Society
 St. Lucie County Audubon
 Pelican Island Audubon
 St. Lucie County Native Plant Society

We are obligated here to record our continued and principled opposition to this taking as we see that it serves as both precedent for DEP to negotiate away even the most valuable state parklands, and a template for municipalities to employ to get their own roads and bridges built through their adjacent state parks.

It is unequivocal that the taking of state parks for roads and bridges is not part of any purpose or mission of Florida state parks, and constitutes an “incompatible use”.

Here is what DEP said in 1999 about the use of Route 1C (in contrast to 5-6 alternate routes):

This location is in the “widest part of the aquatic/buffer preserve complex ... impacting public lands to the greatest possible extent,” and that “it is unlikely that a location with a greater environmental or recreational impact could be chosen.”

This area represents the largest remaining intact 100-year floodplain wetland complex, with an index of 14 FNAI habitats along the full length of the 1C corridor (with Halpatokee said to contain 7 FNAI habitats alone: the best Essential Fish Habitat for listed, rare and commercially important fish species, and habitat for hundreds of other native and migratory bird species, a good number of which are also listed.) The area was purchased as a **Buffer** Preserve for the NFSLR.

Without exception every single regulatory agency objected to Route 1C. The U.S. Army Corps of Engineers stated that 1C was the “MOST environmentally damaging route” with respect to Section 404 of the Clean Water Act. There is no doubt that its ecosystems functions will be degraded or lost, with practically two-thirds of the US1 bordering section either paved over, shaded or covered with run-off basins. It is the height of irony that in what has been called the site of the most pristine high functioning floodplain wetland complex along the NFSLR that these “pristine” wetlands are being sacrificed for and replaced by man-made structures, very likely to add pollution to Evans Creek and the NFSLR. Not to mention remove critical habitat for all time.

We have much to say on this issue and refer DEP and put into the record our White Paper and video, “Halpatokee Trails: More than Meets the Eye,” both accessible on the CASLC’s website. (See links below.) Both document the incredible park and ecologically valuable resources of this unit. On the video you can see Dr. Grant Gilmore, Ph.D., a highly reputable scientist who has studied fish in these waters since the 1970s, talking about the irreplaceability of a backwater fish nursery for tarpon, fed by Hogpen Slough. Such places are rare and the bridge will mean the death of one of the few remaining fish nurseries along the St. Lucie River.

White Paper:

www.conservationallianceslc.org/uploads/5/0/3/6/50361177/white_paper.pdf

Halpatokee Trails video on opening page of the CASLC’s website:

www.conservationallianceslc.org

If the DEP itself is proclaiming such areas in the NFSLR watershed as “scarce, unique, and irreplaceable,” then why did it allow one such critically important area, residing within a supposedly protected PRESERVE state parkland, to be negotiated away?

Mitigation is supposed to be the last step in analysis of alternative routes. Any mitigation package must not be allowed to persuade DEP to sacrifice any park to degradation and outright destruction. Mitigation is not a negotiating tool for municipalities to take any parkland they wish, and most egregiously, the “ecological gem,” the crown jewel that Halpatiokee Trails is along the NFSLR.

Recall that in the MOU the mitigation package counted for ANY route, and thus should have obligated the DEP to choose the least impacting route to the NFSLR-Aquatic Preserve, the NFSLR-BP, and its terrestrial parklands (uplands and wetlands) found in Halpatiokee Trails itself.

We challenge any DEP staffer or any scientist to prove that the mitigation the city offered replaces any of the ecosystem values, functions, and habitat that Halpatiokee Trails and bridge corridor will lose when the bridge is built.

The DEP still has time to reverse its decision to grant the upland easement through Halpatiokee Trails. To do so will be the first step to restore the public’s trust that the sanctity of our state parks has a chance to prevail. If not, those people who revere our state parks will continue to distrust any initiative DEP undertakes, and will take to the mainstream and social media to present their case, and to the courts when no other option remains for the protection of our beloved state parks.

We are grateful that DEP included the CASLC in their Advisory Group. When representatives from outside advocacy groups are included, we feel that DEP obtains a better range of useful comments in their analysis. City, county, and state staffers’ inputs are very important but may be restrained. We encourage the free expression of opinions and comments, both individually and in a group setting. Oftentimes, problems and potential solutions are best uncovered as folks get a chance to hear what others think.

Thank you for your indulgence of this lengthy comment letter. Please know that we have the very best interest of our state parks at heart.

Sincerely,

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