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July 27, 2009

Secretary Tom Pelham
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

RE: Large Area Plans for Conservation Purposes

Dear Secretary Pelham:

On behalf of Audubon I applaud your efforts to return DCA to its appropriate role as the state planning agency. Your timely intervention into key decisions has set a new and welcome tone for oversight of comprehensive plan changes.

For the last several years Audubon has encouraged Florida's large landowners to engage in conservation planning processes. Privately held lands, especially larger holdings, if kept intact and retained in agriculture or conservation management, are an essential part of strategies to protect and restore watersheds, ecosystems, wildlife corridors and other sensitive habitats. We are well beyond the point where we can depend on public land acquisition to protect even a major percentage of the conservation lands in need of preservation. We also note that many major landowners favor alternative conservation strategies to public acquisition.

Audubon has come to accept that many landowners would like to be able to obtain the option of securing entitlements to ensure and enhance long-term development potential on relatively small portions of their holdings, in exchange for providing enforceable guarantees of conservation strategies that will secure the majority of their acreage in permanent agriculture and conservation land uses. We do not see planning efforts such as Sector Planning or Rural Land Stewardship as primarily land development strategies; we see them as innovative land acquisition tools. And with some notable exceptions, most landowners who have considered the uses of those planning tools are more interested in long-term horizons rather than short-term ventures for development activities.

The recent DCA decision related to the proposed sector plan for the Knight Property in Washington County, along with the lack of results for many large landowners who have considered rural land stewardship, has sent a message that large-area, long-term conservation planning coupled with enhancement of development rights is not welcome in Tallahassee. That is an unfortunate result. Audubon of Florida and its local chapter, Bay County Audubon Society believe DCA made the wrong call on the Knight Property decision.

Conservation of Florida's land and water resources requires policy based tools that encourage landowners to plan for the long-term protection of environmentally important lands in exchange for obtaining entitlements in advance for eventual development on a smaller portion of their property, without having to commit to or plan for immediate land use changes. We do not believe it is appropriate for DCA to apply a "needs" analysis to these decisions based on current population growth projections. If the current tools are not workable, dialogue should begin at once to improve them or develop new approaches.

Audubon urges you to engage landowners, conservation groups, resource protection agencies and others in a serious effort to chart a process for large area planning. The environmental resources that could be beneficially managed and protected on privately held lands make the investment of time and effort in agreeing on long-term planning processes an important endeavor. DCA should be proactive and take the lead in convening stakeholders to reach a viable consensus and making recommendations for policies that go beyond current laws and rules to truly allow landowners to plan for the long-term.

In closing I again acknowledge the hard work and good results of the planning staff at DCA since you assumed the role of Secretary. You have restored public confidence in the agency. From that position of strength you can well afford to engage in a process that incentivizes planning for the purpose of securing our natural resource infrastructure.

Sincerely,

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

Eric Draper,
Deputy Director