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April 26, 2018

Issues With Base and Supplementary Credits

Base Credits

1. How accurately and independently were SSA's established? It takes ecologists with expert and extensive knowledge to identify types of habitat forming flowways, natural habitat, and water retention areas.

Why does the white paper indicates 49,209 SSA acres (for 15 approved SSA's) while policies 3.1, 3.2, and 3.3 total approximately 94,982 acres?
Per WM Sept.2008 "NRI based SSA's" total 92,000 acres.

Furthermore there is no doubt that there have been many changes since 12 - 16 years ago when most of these SSA's were determined.

2. How were NRI values established?

They are also based on 12-16 year old "data". Have they been "ground truthed"?

NRI's vary from 0.6 to 2.2. With what competence and clarity were these levels established?

For instance the cutoff for NRI layers and values defining Ag1 and Ag2 at 1.2 or less.

They appear arbitrary and certainly are not transparent.

3. There is currently available a much better and transparent system and one less prone to arbitrary or less knowledgeable input defining natural areas of flowway, habitat, and water retention areas.

CLIP 4.0 "Critical Lands and Waters Identification Project" is such a system of definition and overlays.

It was developed by Florida Natural Areas Inventory, University of Florida GeoPlan Center for Landscape Conservation, and Florida Fish & Wildlife Conservation. In addition to demarcating the major SSA's natural areas it would provide priority values which could replace NRI's.

It comprises biodiversity layers – including habitat richness and priority communities, ecological and landscape integrity layers, significant surface waters, floodplain and wetland layers, and aquifer recharge areas.

Issues with supplementary credits

Between transmittal credits 134,388 (16,800 acres) and adoption credits 315,000 (43,300 acres) and a multitude of credits were added up to somewhere around 404,000 subsequently.

Concerns are with how and when supplementary were developed, and about how well their promised conditions would be implemented. Very importantly, how implementation would be verified. There are concerns with limited county staff, knowledge base, and management costs for an uncertain future.

Credit valuation

Subsequent to "adoption" The committee requested increased credits for ACSC agricultural lands from .15 credits to 2.6 and additions to 2.0 credits/acre on all other agriculture. Implications of these values (seemingly arbitrarily set) affecting other RLSA goals than agriculture were not provided. An expanded number of SSA credits would of course serve to favor more intensive development.

Another example of credits suggested beyond transmittal and adoption is panther corridor credits which were offered. They would be useless if not built to proper minimum widths. Corridors were later determined to require approximately widths of one mile.

We need to determine the history, accuracy and intent of supplementary credits

Year issued and approved

Amounts

Rationale / purpose / locations

NRI and acreage

Impacts on:

Agriculture --- Intensive Development --- Conservation --- Listed species --- Public land --- Infrastructure

Fragmentation of agriculture

Fragmentation of habitat, especially endangered and listed species (so called umbrella species)