

April 18, 2023

U.S. Fish and Wildlife Service
NWRS SWFL CA
P.O. Box 700188
Wabasso, FL 32970

RE: Proposed Establishment of the Southwest Florida Fish and Wildlife Conservation Area

To Whom It May Concern:

On behalf of Audubon Florida, I submit these comments on the proposed establishment of the Southwest Florida Fish and Wildlife Conservation Area. We are encouraged to see the U.S. Fish and Wildlife Service (Service) move forward with this initiative which would support landscape-level conservation goals, improve habitat connectivity, and enhance our blue-green economy. As the Service develops a Landscape Protection Plan for this region, we encourage staff to consider the following comments.

Study Boundary

We are pleased to see that the study boundary for this project is relatively expansive. With land increasingly being developed for housing, commercial purposes, or extractive uses, it is important to keep the geographic scope of the final acquisition boundary in the Land Protection Plan (LPP) broad, to better capture land protection opportunities throughout these vulnerable watersheds.

Elements currently reflected in the study boundary that we think are especially important:

- The study boundary includes, and the final acquisition boundary should retain, important connections between the Everglades Headwaters National Wildlife Refuge (NWR) and Conservation Area, the headwaters of the Peace River all to the north, and the Florida Panther National Wildlife Refuge to the south. These longstanding landscape connections enhance habitat connectivity north-south throughout these vast and ecologically diverse regions of the state.
- The study boundary includes, and the final acquisition boundary should retain important northeast-southwest landscape connections within the occupied breeding range of the Florida panther between the Panther NWR and Big Cypress National Preserve and crossing the Caloosahatchee River. These connections traverse a mosaic of working private lands in the Corkscrew Regional Ecosystem Watershed (CREW) Flint Pen Strand and Camp Keais Strand units, and the Big Cypress Area of Critical State Concern Okaloacoochee Slough region.

Suggestions to improve the proposed final acquisition boundary:

- The final acquisition boundary should include Collier County's Rural Land Stewardship Program and those landowners who are in the process of committing to permanent

Stewardship Easements currently totaling over 50,000 acres. Service data shown on the Combined Ecological Priorities Map supports the ecological importance of these easements and they should be shown as protected areas as they demonstrate the value of partnering with strategic local government conservation and land use planning programs.

- The final acquisition boundary should include parcels of land outside of the Florida Wildlife Corridor footprint that did not meet the connectivity criteria yet remain important for ecological protection for watershed, water resource, and agricultural reasons, or as unique aquifer-recharge areas. A recent evaluation of the Florida Wildlife Corridor led by the University of Florida's Water Institute¹ found that it did not serve as a meaningful proxy for the protection of water resources, including aquifer recharge areas, and projects including water resource protection as a goal must employ additional prioritization tools. Regarding aquifer recharge areas, there is an increasing effort in Southwest Florida to transition public water supply to the Floridan Aquifer for water conservation purposes. Large recharge areas for the Floridan Aquifer are along the Lake Wales Ridge and surrounding land in the Southern Water Use Caution Area (SWUCA). Protection of recharge areas is essential to ensure the future availability of groundwater.
- USFWS should take a closer look at regions that have been historically underrepresented for land conservation efforts, such as the Peace River basin. At a minimum, the Service should review not only Florida Ecological Greenways Network (FEGN) Layers 1, 2, and 3 but include layers 4 and 5 as well to ensure that all potential valuable conservation lands are considered for the final acquisition boundary.

Agricultural Fragmentation

As the LPP is developed, it is important to consider that fragmentation not only harms natural areas but also agricultural areas. Agricultural lands provide connectivity and ecosystem services critical to the success of the LPP. As more areas of Southwest Florida are lost to development, industrial and extractive uses, agricultural lands are lost directly, and along with them, the opportunities to engage in land conservation opportunities such as conservation easements or payment for environmental services.

Landscape conversion also drives indirect loss of agriculture, by diminishing the viability of adjacent agricultural lands. When neighboring land is converted, producers experience restrictions on controlled burning; alterations to hydrology and water quality; impacts from domestic pets, exotic plants, greater traffic, and trespass; and increased danger to escaped livestock. If agricultural acres fall below thresholds, the specialty supply business (e.g., feed, irrigation, and pumping businesses) can fail, increasing hardship on producers. We must prioritize these areas under this study to ensure the economic viability of agriculture while also ensuring that the blue-green infrastructure opportunities that these lands provide remain viable. Without a doubt, when we have a robust, environmentally sustainable agricultural sector, we are more likely to have a healthy wildlife corridor and healthy watershed throughout the region. Policies such as predator compensation programs for the depredation of livestock in the panther range can help support agricultural partners contributing to the viability of this landscape.

¹ Florida Wildlife Corridor Water Benefits Reports, University of Florida Water Institute, Dec 2022. UF-Water-Institute-FLWC-Water-Benefits-Final-Report-12.19.22.pdf (ufl.edu)

Fee Simple and Less-than-Fee Simple

Audubon is supportive of fee and less-than-fee land acquisitions under the eventual LPP and final Conservation Area/NWR. For ease of multi-use management including recreation, fee simple land acquisition may prove logistically easier for managers. Easements are more focused on preventing the development and sometimes advancing restoration, which allows landowners to continue using their property for monetary purposes. We find value in both options. We also encourage the Service to explore Payment for Environmental Services opportunities and the possibility of using both federal DOI and State of Florida Payment in Lieu of Taxes (PILT) programs, particularly for lower population inland communities that may lose ad valorem tax revenue as lands transition into conservation.

Resources and Funding

The National Wildlife Refuge System has experienced chronic underfunding for many years. To enable this future Southwest Florida Fish and Wildlife Conservation Area/National Wildlife Refuge to operate at its full potential, it requires fully funding the management of this unit. The unique resources in Southwest Florida warrant scaled investment in management to meet both user and ecological needs of the area.

In conclusion, we think the current proposed study area boundary maximizes conservation opportunities and encourage keeping it. We also think acreage limits, such as the 150,000 acres of the Everglades Headwaters Refuge, are arbitrarily limiting, and leaving the area open-ended also maximizes opportunities moving forward.

We are supportive of this initiative to develop the Southwest Florida Fish and Wildlife Conservation Area. This effort presents an important opportunity to conserve our fragile natural areas, protect our wildlife, and ensure the long-term sustainability of our blue-green and agricultural economies in the region. These preserved and restored landscapes also will play an important role in assuring resiliency for growing and changing Florida human communities.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "John H. Smith". The signature is fluid and cursive, with a large loop at the end.

Vice President and Executive Director
Audubon Florida