



**COASTAL & HEARTLAND NATIONAL ESTUARY PARTNERSHIP**  
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[www.CHNEP.org](http://www.CHNEP.org)

April 7, 2023

U.S. Fish and Wildlife Service  
Southwest Florida Conservation Area  
NWRS SWFL CA, P.O. Box 700188,  
Wabasso, Florida 32970  
*Submitted via email to [southeast\\_fws\\_planning@fws.gov](mailto:southeast_fws_planning@fws.gov)*

To Whom it May Concern:

The Coastal & Heartland National Estuary Partnership (CHNEP) offers the following technical comments on the Proposed Southwest Florida Fish and Wildlife Conservation Area. We very much appreciate U.S. Fish and Wildlife Service's (USFWS) solicitation of public input and offer these suggestions in support of your efforts to conserve habitat in southwest Florida.

#### CHNEP Interest in Proposed Southwest Florida Fish and Wildlife Conservation Area

The CHNEP is part of the U.S. EPA National Estuary Program, created by Section 320 of the Clean Water Act, to protect and preserve the estuaries and watersheds from Lemon Bay to Estero Bay in Central and Southwest Florida – recognized as estuaries of national significance by Congress. Long-term management, preservation, and restoration activities within the CHNEP are guided by our 2019 Comprehensive Conservation and Management Plan (CCMP, available at [chnep.org/our-plan](http://chnep.org/our-plan)), developed and implemented with all the local, state, and federal entities in the Partnership.

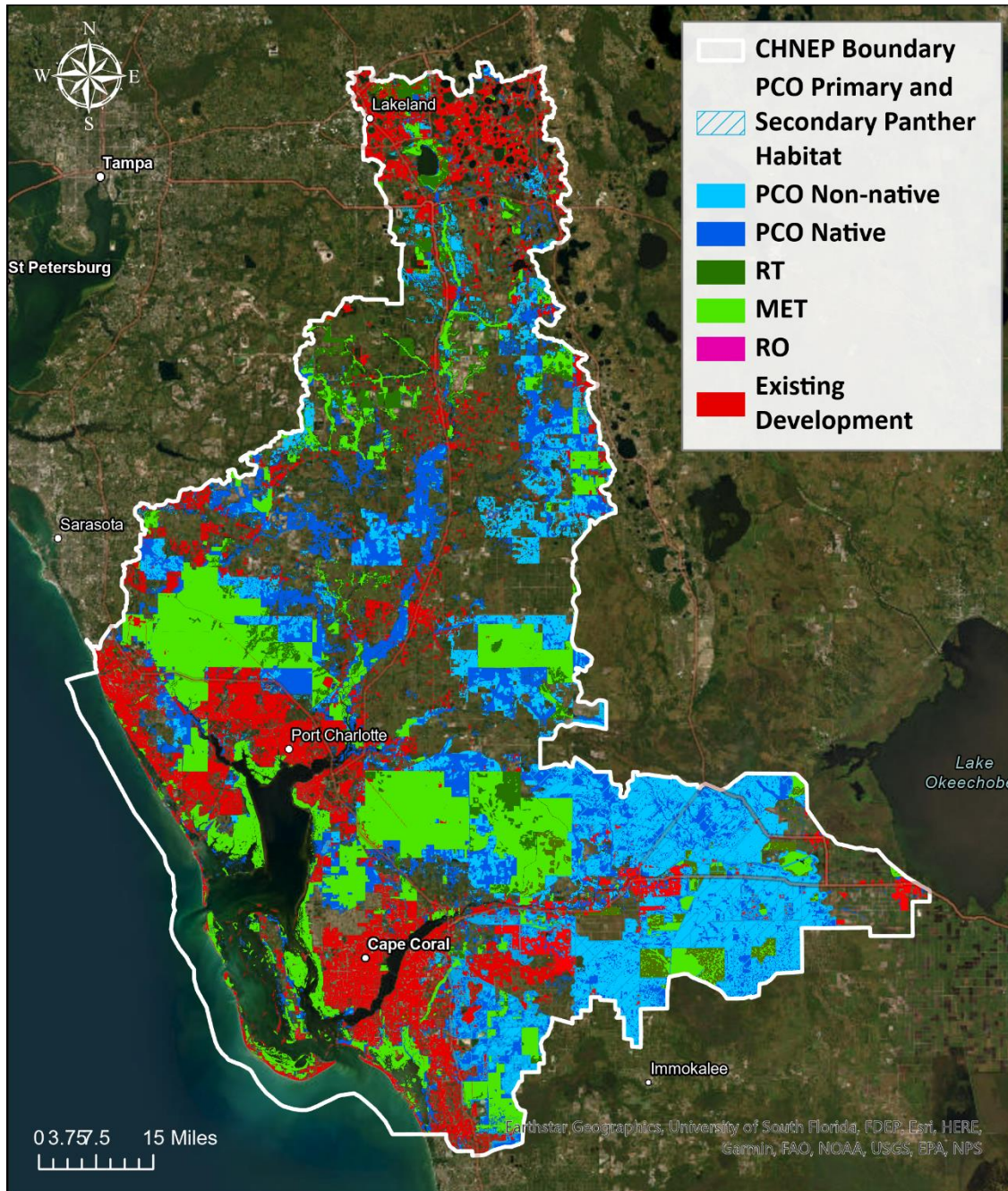
Our CCMP priorities include Water Quality Improvement, Hydrological Restoration, Fish, Wildlife, & Habitat Protection, and Public Engagement. Herein we address Fish, Wildlife, & Habitat Protection Action 2, to protect, restore, and monitor environmentally sensitive lands and waterways including critical habitat areas, specifically to encourage and support the permanent conservation of environmentally sensitive lands and critical habitat areas through land acquisition and conservation easements held in perpetuity, including freshwater wetlands, flowways, corridors, and uplands adjacent to coastal habitats necessary for habitat resilience and migration. The proposed Southwest Florida Fish and Wildlife Conservation Area supports this Action identified as important to all the members of the CHNEP.

#### Proposed Southwest Florida Fish and Wildlife Conservation Focus Area to Include Identified CHNEP HRN Preservation/Conservation Opportunities

The CHNEP supports USFWS efforts to establish a conservation area to protect land and water in Southwest Florida. The CHNEP's Habitat Restoration Needs Plan (HRN, available at [chnep.wateratlas.usf.edu/habitat-restoration-needs](http://chnep.wateratlas.usf.edu/habitat-restoration-needs)) guides habitat preservation/conservation, connectivity, management, restoration, sustainability, and resiliency throughout the CHNEP area. The Plan identifies preservation/conservation and reservation opportunities, as well as management/enhancement and restoration targets, in each area. This Plan was developed in partnership with CHNEP representatives from state agencies, member Counties and Cities and NGO's in the Central and Southwest Florida region.

The Preservation/Conservation Opportunities (PCO) were identified from private lands that may be considered for preservation or conservation through acquisition, easement, or other means. These areas present an "opportunity" to work with willing landowners, both public and private, to preserve, conserve, and potentially enhance habitats within the watershed. The CHNEP recommends that areas identified as PCO in the HRN Plan, both native and non-native, be included in the proposed conservation area. These areas represent important opportunities where federal, state and local land acquisition and easement

programs can invest in order to save priority habitat areas. In fact, these potentially restorable lands would expand existing preservation and conservation lands into larger ecosystem units and consolidate major wildlife corridors within the region, moving toward landscape-level protection. They are shown in dark and light blue in the map below.



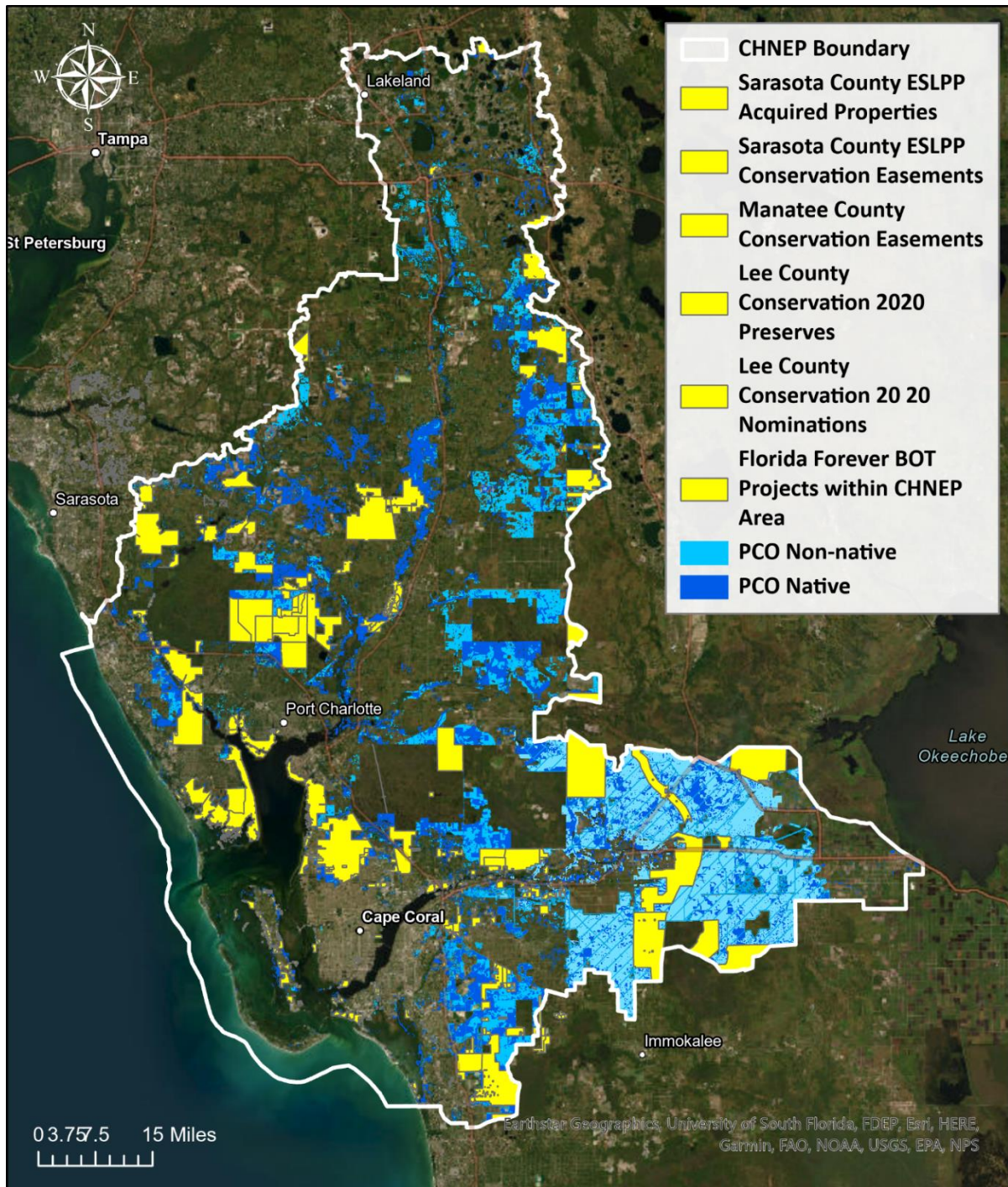
Conservation Prioritization to Most Vulnerable Areas

*Prioritization for Areas with Least Potential Protection Mechanisms*

The State of Florida’s conservation and recreation lands acquisition program, the Florida Forever Program, has identified land acquisition projects throughout the State. Additionally, some local municipalities within the Proposed Study Area have existing land acquisition and easement programs as well. For example, Lee County Conservation 20/20 is a land acquisition and stewardship program to protect natural areas in Lee County for the benefit of present and future generations in Southwest Florida.



The Florida Forever properties and other conservation land acquisition programs are shown in yellow in the map below.



The CHNEP recommends the consideration of added criteria weighting to areas with the least potential protection mechanisms (i.e., where no state and/or local conservation programs exist), to use these federal resources to protect the most vulnerable environmentally sensitive lands and habitat areas.

*Prioritization for Areas with Unique and Dwindling Habitats*

The CHNEP recommends that there be prioritization to unique and dwindling habitats that have been disproportionately lost within the proposed boundary area, including rare or unique habitats such as isolated wetlands and uplands, sand pine scrub, pine flatwoods, and hydric flatwoods. As illustrated in the Gains/Losses Table below, there have been disproportionate habitat losses in FLUCCS Codes 3200,

4100, 4200, 4300, and 6300. The results of CHNEP’s habitat status and trends analysis indicated that upland coniferous forests, predominantly pine flatwoods, have suffered enormous losses - approximately 45,000 acres - over the 15-year study period. As a result, a key recommendation of the Plan was to protect and preserve the remaining large tracts of upland coniferous forest habitats, including native pine flatwoods and sand pine scrub Upland habitats are not protected by wetland regulations and are targeted for both agricultural and urban land development activities. These habitats provide important ecosystem functions including aquifer recharge and wildlife habitat. They have suffered disproportionate losses from expanding urban development and should be considered a priority habitat for restoration.

**TABLE 6. HRN CHANGE ANALYSIS GAINS/LOSSES FOR THE OVERALL CHNEP AREA BY HABITAT CLASSIFICATION TYPE.**

FLUCCS Codes	Primary Classification	Acres		Change Analysis	
		1995	2009/2011	Acres	Percent
3100	Dry Prairie	7,663	47,074	39,411	*
3200	Shrub and Brushlands	212,550	169,543	-43,007	-20%
3300	Mixed Rangelands	12,057	20,155	8,098	*
4100	Upland Coniferous Forest	267,232	198,335	-68,897	-26%
4200/4300	Upland Hardwood Forest	84,915	69,816	-15,099	-18%
5100	Streams and Waterways	27,411	28,313	902	3%
5200	Lakes	34,085	31,450	-2,635	-8%
5600	Slough Waters	597	N/A	N/A	*
6100	Wetland Hardwood Forest	164,424	178,819	14,395	9%
6120	Mangrove Swamp	60,990	61,894	904	1%
6200	Wetland Coniferous Forest	53,401	60,673	7,272	14%
6300	Wetland Forested Mixed	15,923	12,815	-3,108	-20%
6400	Vegetated Non-Forested Wetlands	196,930	242,525	45,595	23%
6420	Saltwater Marsh	12,436	12,206	-230	-2%
6530	Intermittent Ponds	97	652	555	*
6600	Salt Flats	4	563	559	*

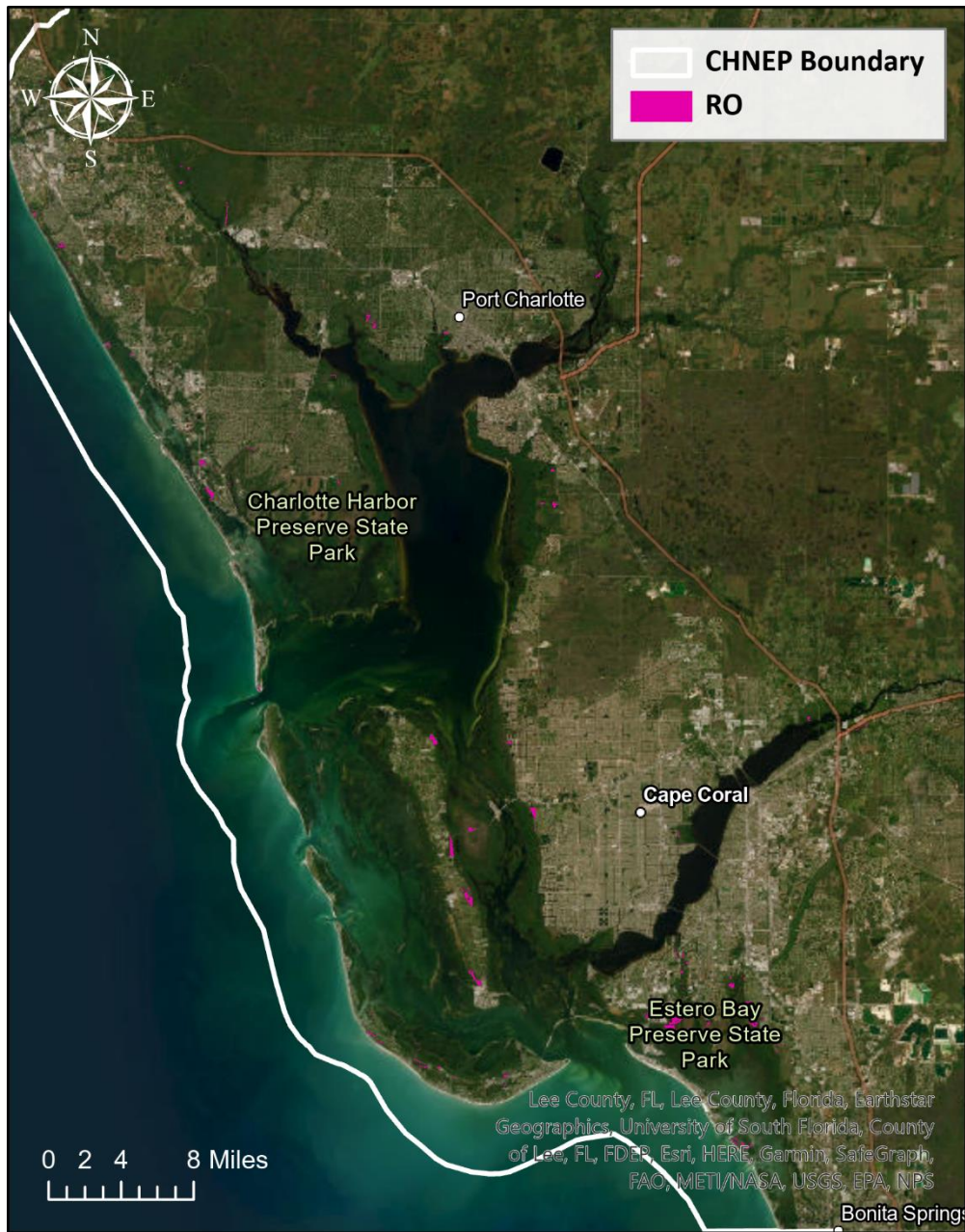
\*Differences in mapping methodologies between periods may account for some anomalies in the data.

#### *Prioritization for Areas with Coastal Habitats Impacted by Sea Level Rise*

The CHNEP Habitat Resiliency to Climate Change Project (HRCC, available at <https://www.chnep.org/chnep-hrn-hrcc-projects>) takes a closer look at likely habitat impacts based on the most recent climate change and sea level rise science. The HRCC predicts the landward migration of mangroves, and the upstream migration of salt marshes in the tidal rivers and tributaries, in response to projected sea level rise over the next 100 years. Based on these predictions, ensuring appropriate freshwater inflows, and restricting future impoundments, in the tidal rivers and tributaries will be important to preserving the balance of the primary tidal wetlands, mangroves and salt marshes in the region.

The Reservation Opportunities (RO) include altered, non-native but non-hardened pervious areas (e.g., ballfields, golf courses, etc.) within the nearshore coastal zone that are expected to experience increased tidal flooding and inundation due to future sea level rise, and that could potentially accommodate tidal habitat migration in the future. Thus, the CHNEP recommends that areas identified as RO in the HRN Plan also be considered in the proposed conservation area. These areas total 1,590 acres and represent important opportunities to allow salt marsh and mangrove habitat migration over the next several decades. They are shown in pink in the map below.

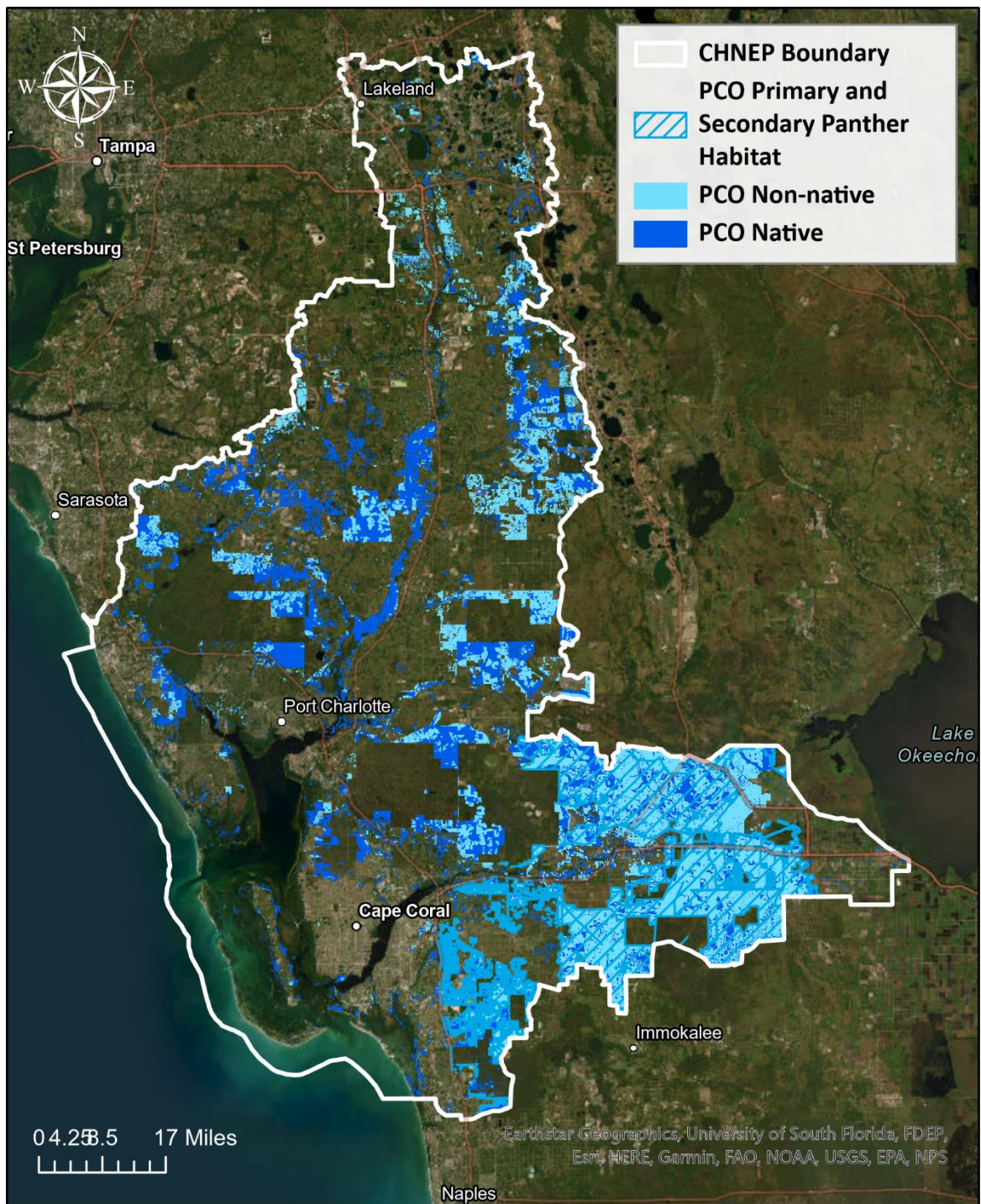




*Prioritization for Federally Endangered Species Habitat*

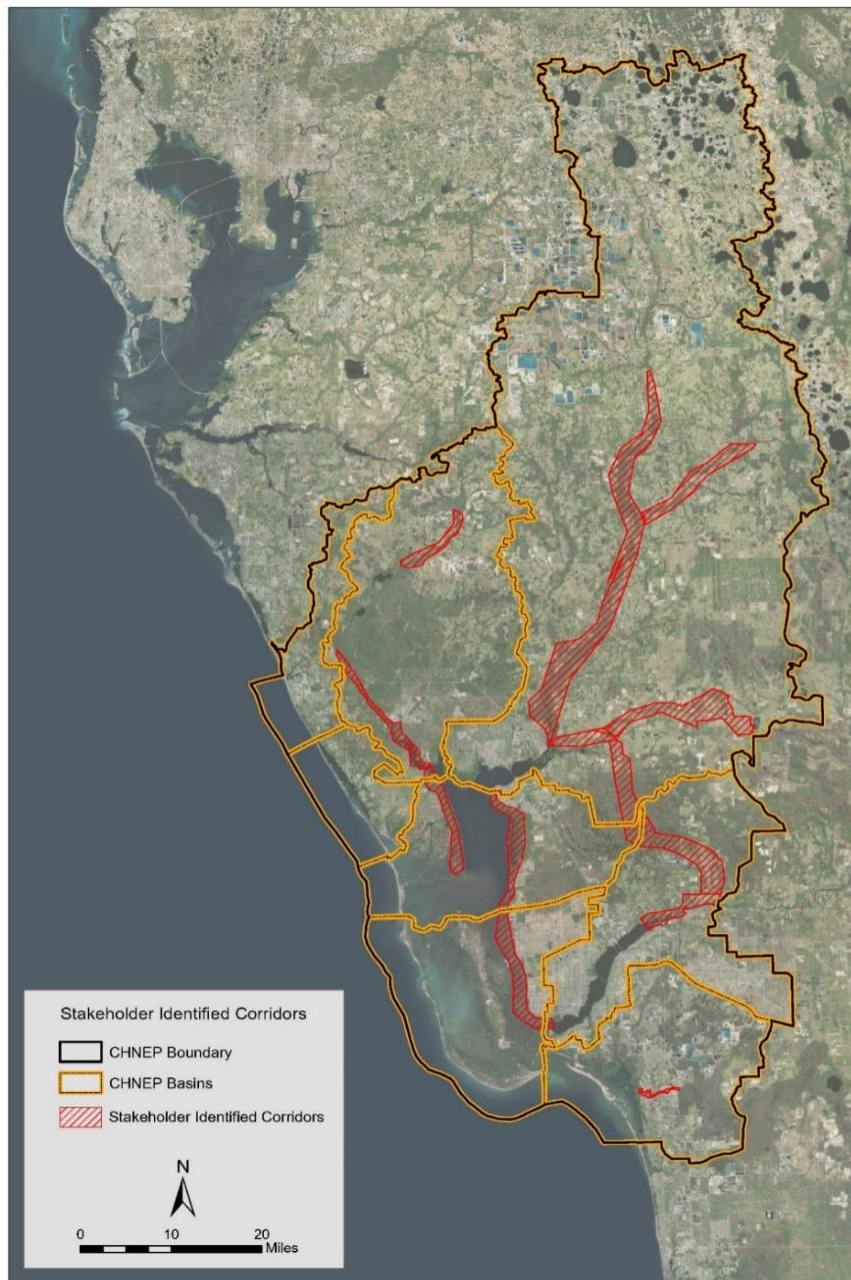
The CHNEP recommends additional consideration be given to PCO areas within federally endangered species habitat. The HRN Plan identified 329,552 acres of PCO within primary and secondary habitat essential to the federally endangered Florida panther, predominantly in the Freshwater Caloosahatchee River basin. These lands provide critical support to Florida panthers by contributing to their foraging habitat and migration pathways in the watershed on both sides of the Caloosahatchee River. They are shown in blue cross-hatch over the PCO areas in the map below.





*Prioritization for Essential Habitat Corridors*

Finally, the CHNEP recommends additional prioritization be given to essential habitat corridors. The HRN Plan identified important fish and wildlife migratory corridors that are landscape level connectors, including the Peace River Corridor, Myakka River Corridor, Charlotte Harbor to Lake Okeechobee Corridor (through Babcock Webb WMA areas), and publicly owned areas along the West and East Wall of Charlotte Harbor Proper, and Estero Bay to Corkscrew Swamp Sanctuary Corridor. These corridors are shown in red in the map below.



Other Comments

The CHNEP supports a mixture of fee and less-than-fee (conservation easements) acquisitions. Areas identified as PCO Native in the CHNEP HRN Plan could be acquired as fee-simple, while areas identified as PCO Non-native such as agricultural lands could be acquired as conservation easements. Additionally, recreational uses should be tailored to and compatible with meeting the conservation objectives of each property.

On behalf of the CHNEP, thank you for this opportunity to provide comment and please feel free to contact me at (941) 833-6583 should you wish to discuss this further.

Sincerely,

*Jennifer Hecker*  
Jennifer Hecker  
Executive Director