



CHARLOTTE HARBOR NATIONAL ESTUARY PROGRAM

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May 28, 2010

ARC Public Hearing
Acquisition and Restoration Council
3900 Commonwealth Blvd. MS 100
Tallahassee, FL 32399

Re: Florida Forever intra-category ranking

Dear Council:

The Charlotte Harbor National Estuary Program (CHNEP) is pleased to submit its comments on ranking the Florida Forever projects individually in numerical priority order within categories. The CHNEP appreciates that the Acquisition and Restoration Council (ARC) has a formidable task ranking the projects within the newly established categories and commends staff for meeting the challenge to develop a ranking system that can be applied across all current and future Florida Forever projects.

The CHNEP is a partnership program, created by Section 320 of the Clean Water Act, to protect and preserve the Charlotte Harbor estuary, recognized as an estuary of national significance and one of the most productive estuaries in Florida. Long term management, preservation and restoration activities within the CHNEP are guided by our Comprehensive Conservation and Management Plan (CCMP) 2008, developed and implemented by our partners. The CCMP lists four priority problems, accompanied by more specific quantifiable objectives and priority actions relating to improving water quality, hydrology, fish and wildlife habitat, and stewardship throughout the Charlotte Harbor watershed.

The Florida Forever program implements the CHNEP's CCMP, specifically the following Quantifiable Objectives and Priority Actions:

- **FW-1:** Meet the stated objectives for the target extent, location and quality of the following habitats in the CHNEP study area: submerged aquatic vegetation (SAV), submerged and intertidal unvegetated habitats, mangroves, saltwater marsh, freshwater wetland systems, oyster bars, native upland communities and water column.
- **FW-2:** By 2025, achieve a 100 percent increase in conservation, preservation and stewardship lands within the boundaries of the CHNEP study area. The increase will be based on 1998 acreage of existing conservation, preservation and stewardship lands.
- **FW-3:** By 2020, on conservation, preservation, stewardship and other public lands, achieve controllable levels of invasive exotic plants, as defined by Florida Exotic Pest Plant Council, and exotic nuisance animals, as defined by the Florida Fish and Wildlife Conservation Commission. Encourage and support the removal and management of invasive exotic plants on private lands.
- **SG-Q:** Build capacity for communities and their local leadership to mitigate and adapt to the effects of climate change through joint efforts.

The CHNEP reiterates its support for adding the **Peace River Refuge** and **Peaceful Horse Ranch** projects to the Florida Forever project list. Both projects will assist in achieving the newly established MFLs for the Peace River, and contribute additional connectivity among conservation lands in Southwest Florida. Moreover, the CHNEP reaffirms its support for completing the land acquisition for the following Florida Forever projects:

- **Charlotte Harbor Estuary**
- **Charlotte Harbor Flatwoods**
- **Estero Bay**
- **Pineland Site Complex**
- **Corkscrew Regional Ecosystem Watershed**

In anticipation of ARC's task of ranking the projects within the five categories, the CHNEP has reviewed the 18-24 Florida Administrative Code (FAC), *Florida Forever Land Acquisition and Management*, and provides the following comments.

The CHNEP applauds ARC for recognizing the importance of habitat connectivity at the micro and macro level as reflected in 18-24 FAC. Connectivity within and between Florida Forever projects is critical to providing opportunities for natural response to climate change including habitat migration and succession. The CHNEP recommends utilizing habitat climate change resiliency due to landscape connectivity as a criterion when performing the Florida Forever projects intra-category ranking. This criterion will complement the Climate Change Lands category criterion of percent inundation by a one meter rise in sea level.

At the macro-level, the Florida Forever projects located within Southwest Florida provide habitat climate change resiliency due to landscape level connectivity from the shores of Charlotte Harbor east to Lake Okeechobee. At the micro-level, the **Charlotte Harbor Estuary** project has low-lying wetlands adjacent to uplands which will enable floral and faunal migration and succession within the project boundaries in response to climate change.

Thank you for consideration of these comments. If the CHNEP can be of further assistance, or if you have any questions regarding the above concerns, please contact me at the CHNEP office a (239) 338-2556 x 235 or via e-mail at lbeever@swfrpc.org.

Sincerely,



Lisa B. Beever, PhD, AICP
Director