



COASTAL & HEARTLAND NATIONAL ESTUARY PARTNERSHIP
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October 6, 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

To Whom it May Concern:

The Coastal & Heartland National Estuary Partnership (CHNEP), comprised of numerous local, state, and federal governmental entities (see Appendix A), is writing to convey our strong support for the proposed establishment of *Everglades to Gulf Conservation Area* (EGCA, formerly called Southwest Florida Fish and Wildlife Conservation Area). The CHNEP is part of the US EPA National Estuary Program, created by Congress 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.” The EGCA area encompasses the CHNEP member counties of Polk, Manatee, Hardee, Highlands, DeSoto, Sarasota, Charlotte, Glades, Hendry, and Lee.

Proposed EGCA Provides Large-scale Economic Benefit

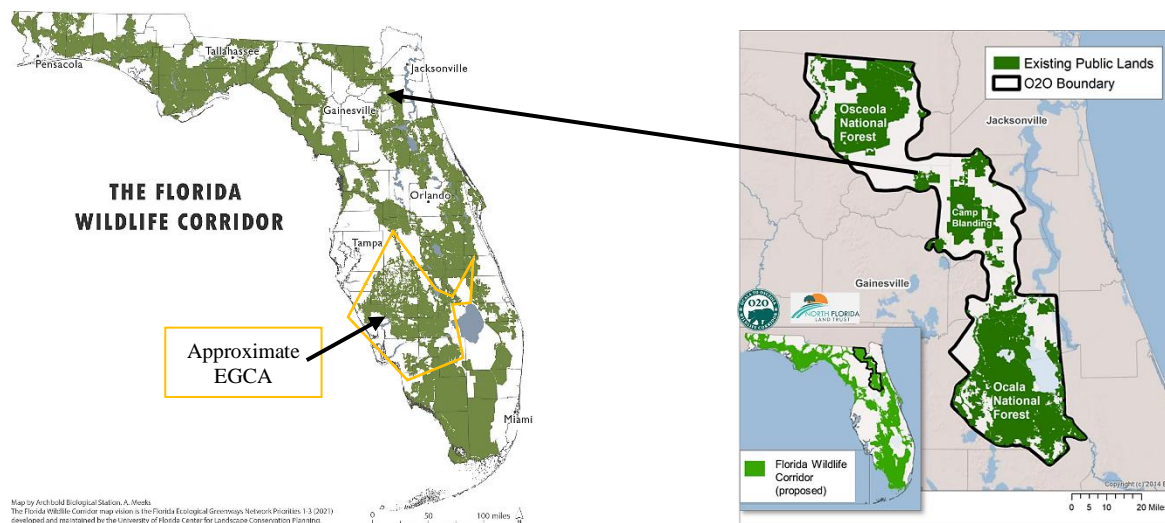
Florida is the United States’ 4th largest economy. The CHNEP hired a team of economists in 2020 to quantify the economic revenue generation in the CHNEP that it directly supported by natural resources in the area. This [Economic Valuation Study](#) showed that natural resources are generating \$11 billion a year in recreational expenditures, \$2.5 billion in agricultural production, and supporting other regional economic sectors to the tune of \$14 billion dollars total per year. With the rapid loss of environmentally sensitive lands leading to loss of wildlife and their habitat, degraded water quality, and alteration of hydrology, those economic revenue benefits are at risk. The proposed EGCA, in investing in protecting those natural resources and environmentally sensitive lands, secures those economic benefits for generations to come.

Proposed EGCA Supports Rural Farming and Ranching Communities

Much of the EGCA is comprised of “Heartland” inland counties that are primarily rural communities centered around farming and ranching. Six of these Heartland counties are in the Partnership, thus the Coastal and Heartland in our name. Elected leaders from those counties sit on our governing board and they directly communicate their need for more governmental resources to be directed towards protecting these rural communities and providing more options for farmers and ranchers to remain in those industries. With the EGCA being entirely voluntary and including easements, it offers farmers and ranchers more choices and added potential revenue streams to maintain these vital working landscapes. Doing so preserves their way of life, provides domestic food supply, generates significant economic benefits to the region, as well as protects important habitat for federally listed species - including the endangered Florida panther. With citrus diseases and other threats to these industries, as well as development rapidly expanding into these inland areas, these options and resources that the proposed EGCA would provide are urgently needed to support rural farming and ranching communities in that area.

Proposed EGCA Supports State Conservation Priorities

The State of Florida appropriated \$850 million dollars during the 2023 state legislative session towards the protection of lands in the “[Ocala to Osceola Wildlife Corridor](#)”. This is in addition to the passage of the [Florida Wildlife Corridor Act of 2021](#) to protect the “[Florida Wildlife Corridor](#)”, which has resulted in the budgeting of nearly \$2 billion for protecting lands since 2021. While the total amount of acreage encompassed in these two overlapping corridors totals more than 18 million acres, only 120,000 acres in or adjacent to them has been approved for protection to date.



Map of the Florida Wildlife Corridor (green shaded)

Map of Ocala to Osceola Corridor (black outlined)

The proposed EGCA overlaps a large central portion of the Florida Wildlife Corridor. While there is substantial state investment to date towards acquiring easements and fee-simple acquisition of lands from willing sellers, it is far below the estimated total amount needed. The federal government has a shared interest in protecting these lands, which are habitat to 17 federally threatened or endangered species. The proposed federal EGCA initiative with the associated federal funding it could bring, is urgently needed and will augment state funding towards accomplishing this shared state-federal objective.

Proposed EGCA Supports Regional and Local Conservation Priorities

Long-term natural resource management, preservation, and restoration activities within the CHNEP area are guided by the Partnership’s collective 2019 Comprehensive Conservation and Management Plan (CCMP, at chnep.org/our-plan). Our CCMP priorities include Water Quality Improvement, Hydrological Restoration, Fish, Wildlife, & Habitat Protection, and Public Engagement. 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 establishment of the proposed EGCA would implement this Action identified as important to all the members of the CHNEP.

Additionally, the CHNEP spent several years consolidating all existing habitat and land conservation plans and built consensus to create one master [CHNEP’s Habitat Restoration Needs Phase I and Phase II Plan \(HRN\)](#). The CHNEP HRN was utilized in the creating of the proposed EGCA boundary and map, including most of the HRN’s preservation/conservation and reservation opportunities. Therefore, the EGCA as proposed reflects regional and local conservation priorities.

Proposed EGCA Protects Water Resources

As previously mentioned, the EGCA overlaps the Florida Wildlife Corridor. There is a recent [Florida Wildlife Corridor Benefits Report](#) from the University of Florida, Geo2030 Consulting and Florida International University for Archbold Biological Station that assessed what water resource benefits would be gleaned from protection of the environmentally sensitive lands in this area. In [summary](#), they found that conservation of just these areas would protect the majority of spring vents, freshwater swamps, freshwater marshes, river corridors, river watersheds and estuarine wetlands in the entire state. In addition, there would be significant benefits to surface water quality and supply, groundwater quality and supply/recharge, springsheds, lakes, coastlines, and fragile coastal uplands. In short, protecting these critical lands is also protecting critical water resources that are relied upon by both people and wildlife.

Recommendations for Implementing the Proposed EGCA

Once the EGCA is finalized, the CHNEP offers the following recommendations pertaining to its implementation. Firstly, we would be to prioritize acquiring easements on lands with least potential protection mechanisms already in place (such as those that are not currently included as priorities in state or county land conservation programs but are within the identified EGCA). Secondly, we would recommend prioritizing areas with unique and dwindling habitats that have been disproportionately lost within the proposed EGCA, including rare or unique habitats such as isolated wetlands and uplands, sand pine scrub, pine flatwoods, and hydric flatwoods. Thirdly, we would recommend prioritizing areas with federally endangered species habitat – especially the primary and secondary habitat for the federally endangered Florida panther. Fourthly, we would propose prioritizing essential habitat corridors, as outlined in the [CHNEP Habitat Restoration Needs Phase I](#) and [Phase II Plan](#). Finally, we support a mixture of fee and less-than-fee (conservation easements) acquisitions. Additionally, recreational uses should be tailored to and compatible with meeting the conservation objectives of each property.

We recognize the significance of this historic opportunity to protect the most important last remaining environmentally sensitive lands in Florida. On behalf of the CHNEP, we strongly support the establishment of the Everglades to Gulf Conservation Area. Please feel free to contact me at (941) 833-6583 should you wish to discuss this further.

Sincerely,



Jennifer Hecker
Executive Director

APPENDIX A

The Coastal & Heartland National Estuary Partnership (CHNEP) is comprised of elected officials, resource managers and commercial and recreational resource users working to improve water quality and ecological integrity of other natural resources in its boundaries. A cooperative decision-making process is used to address diverse resource management concerns in its 5,416-square-mile area of Central and Southwest Florida. Many of these partners also financially support the Partnership. The governmental entities in the CHNEP and its service area include:

U.S. Environmental Protection Agency
U.S. Fish & Wildlife Service
U.S. Army Corps of Engineers
U.S. Geological Survey
U.S. Department of Agriculture
National Oceanic & Atmospheric Administration
Florida Department of Environmental Protection
Florida Fish & Wildlife Conservation Commission
Florida Department of Economic Opportunity
Florida Department of Agriculture
Central Florida Regional Planning Council
Southwest Florida Regional Planning Council
Southwest Florida Water Management District
South Florida Water Management District
West Coast Inland Navigation District
Peace River/Manasota Regional Water Supply Authority
Florida Gulf Coast University
University of South Florida
University of Florida
Polk County
Sarasota County
Manatee County
Lee County
Charlotte County
DeSoto County
Hardee County
Hendry County
Highlands County
Glades County
City of Arcadia
City of Bartow
City of Cape Coral
City of Fort Meade
City of Fort Myers
City of Lakeland
City of North Port
City of Punta Gorda
City of Sanibel
City of Venice
City of Winter Haven
Town of Fort Myers Beach
Village of Estero