



October 14, 2020

Kevin J. Thibault
Florida Department of Transportation
605 Suwannee Street, MS 54
Tallahassee, FL 32399
Via online portal and FDOT.Listens@dot.state.fl.us

Re: South Florida Wildlands Association comments on Southwest Florida
Connector (M-CORES)

Secretary Thibault:

Although South Florida Wildlands Association (SFWA) is a signatory to group comments submitted today on behalf of numerous environmental organizations opposing M-CORES, we are taking this opportunity to submit some additional comments on the Southwest Florida Connector – focusing on impacts to the Florida panther.

SFWA is a small non-profit dedicated to the protection of wildlife and wildlife habitat in the Greater Everglades. From our beginning in 2010, we have had a strong focus on the Big Cypress region or the Western Everglades and especially the protection of the Florida panther and its habitat. This area is also sometimes referred to as the “Amazon of North America” due to its tropical climate and

intense levels of biodiversity. It is also the core breeding habitat of the endangered Florida panther.

Unfortunately, even without the possibility of the M-CORES highway, that biodiversity is at risk. Lee and Collier Counties are the two largest counties of the five that make up Southwest Florida, and, though numbers vary year to year, are often included in lists of the fastest growing counties in the United States. According to the U.S. Census, in 1960, Collier County had a population of 15,753. Its population today is 390,774. Lee County's 1960 population was 54,539. It is 784,818 in 2020. Other counties of Southwest Florida have also grown rapidly during that time. These are staggering rates of growth. During a single lifetime, Southwest Florida went from a relatively undeveloped rural part of Florida in which natural and agricultural landscapes predominated to an extended metro area with an extensive road network and suburban communities. Collier and Lee Counties alone now have well over 1 million residents. Obviously, the need to "revitalize rural communities," - the first intent of the project listed on the M-CORES website - is completely unnecessary in Southwest Florida. Explosive growth has already taken place and continues to take place, M-CORES or not.

SFWA has spoken at length on the problems of any new highways through panther habitat in Southwest Florida during numerous task force meetings. The area's wildlife is already reeling under the weight of the growth noted above in the form of double-digit panther deaths by vehicle collision year after year. Those deaths are in addition to habitat and prey loss from numerous projects that have already been built and the many that are on the way. Two new villages that were recently approved by the Collier County Commission – Rivergrass Village and Hyde Park are just north of the Florida Panther National Wildlife Refuge and adjacent to a critical panther wildlife corridor. And they are included in a general proposal – currently under review by the U.S. Fish and Wildlife Service (FWS) - to allow 45,000 of acres of new development in the same general area in the form of the Eastern Collier County Multi-Species Habitat Conservation Plan.

In addition to our own professional opinions on the topic, we also received the opinion of a professional biologist on the issue of wildlife impacts from M-CORES as a result of a Freedom of Information Act (FOIA) request SFWA sent to the U.S.

Fish and Wildlife Service (FWS). John Wrublik works in the transportation section of the Florida headquarters of the FWS in Vero Beach. Below is the text of an email John sent to his supervisor, Mark Cantrell, in March of 2019 when the legislation which created M-CORES, CS/SB 7068 was still making its way through the Florida Legislature. The bill was passed and subsequently signed into law by Governor DeSantis on May 17, 2019. It is highly unfortunate that this letter was not shared with the legislature or the governor before M-CORES became law. To our knowledge, virtually no environmental review was ever carried out for any of the impacts expected to flow from M-CORES before the bill was signed. And now task forces are expected to create proposed routes for the highway PRIOR to any scientific analysis. Small typos were corrected in the email which follows below:

On Fri, Mar 1, 2019 at 1:12 PM Wrublik, John <john_wrublik@fws.gov> wrote:

Mark, please see email chain and attachment below. It refers to a bill that is being put forward by the president of the Florida Senate that would include at least three new highways. The one that would affect South Florida is new corridor from Polk County through Collier County. This was known previously as the Heartland Expressway. I had seen this proposal several years ago, but it went away. It is now, possibly, rearing its head again. This project would have very serious impacts on the Florida panther (basically a disaster for the panther as it goes through, and would open up for more development, some of the best and last remaining habitat for the panther) as well as other fish and wildlife resources and the environment. Larry and Roxanna asked me to contact you so we can be proactive with FDOT and let them know that the Service has serious, serious concerns about the Heartland Expressway and likely the other two corridors should this this legislative proposal go forward. They requested you discuss our concerns with the FDOT and facilitate a formal letter on the on this proposal. You may have similar concerns for the other two projects (I belief one of them would provide for a new expressway from Central Florida through North Florida to Georgia, not sure of the exact footprints) and could pass on those concerns to the FDOT and include any concerns about those projects in the letter as well. I've been asked to work with you to figure out what would be appropriate for the Heartland proposal. From my point of view that would be fairly straight forward:

1) project would directly result in the loss of a significant amount of habitat types that provide some of the last remaining habitat for the endangered Florida panther and other species of listed and non-listed fish and wildlife.

2) project would indirectly result in the loss of significant amount of habitat for panther and other species by inducing new residential and commercial development by providing new access to a large acreage of undeveloped lands that currently don't have a road infrastructure

3) project would significantly increase the potential for vehicle-related injuries and mortalities of panthers and other wildlife species. This is currently a serious threat to the remaining panther population and would get much worse.

4) these impacts collectively would further imperil the panther and could potentially jeopardize the species.

5) Project would have serious detrimental impacts to a variety of fish and wildlife species and their habitat.

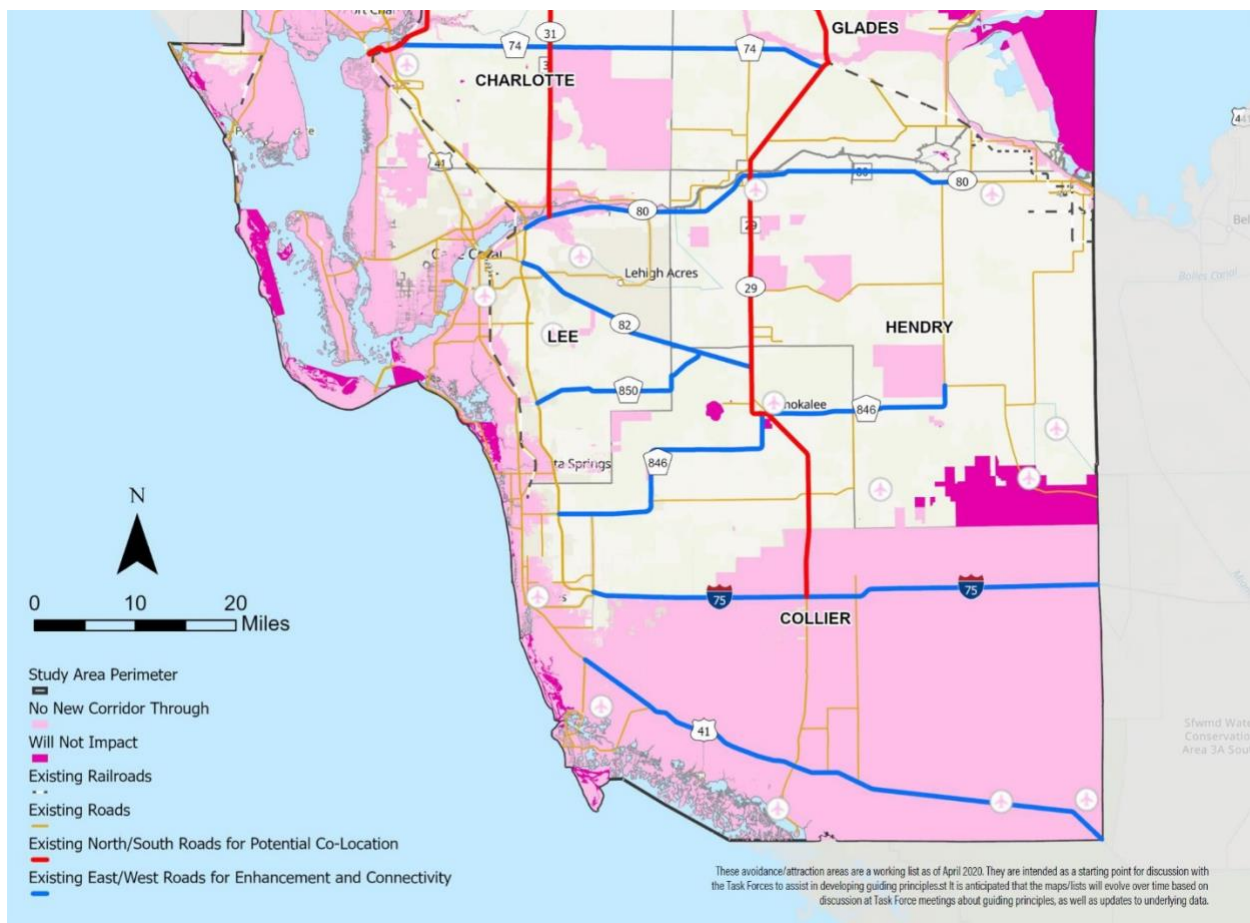
Perhaps you should talk to Larry to see what he would like to include in the letter. I'm here to help in any way I can, and we can get more info if needed from the David Shindle, the lead for the panther.

John

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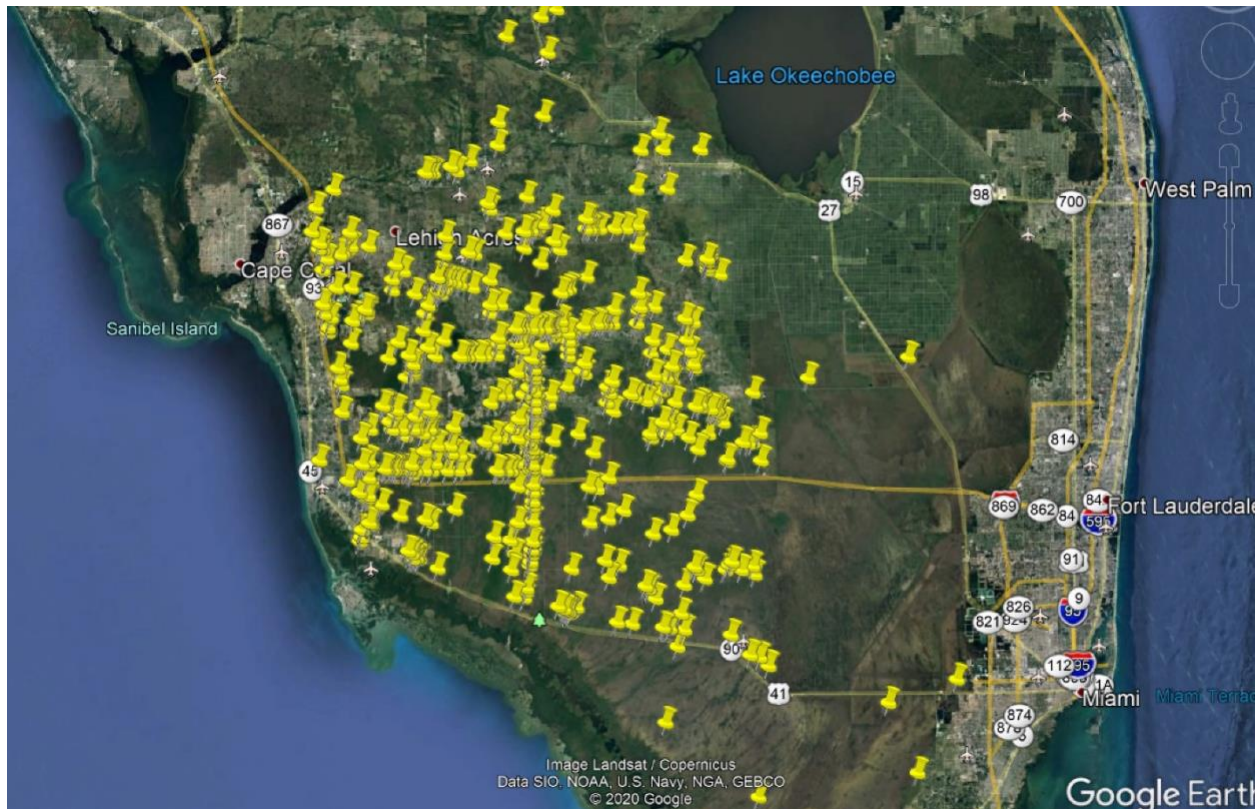
NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

In several meetings, a map of “Avoidance and Attraction Areas” was presented for Southwest Florida. This is the most recent version we received from Brandi Bertram of the Florida Department of Transportation (FDOT). We excerpted the southern section, the area below the Caloosahatchee River, which is the core breeding habitat for the Florida panther.



As can be seen in the map, only a few of the public lands are off-limits to M-CORES roadbuilding. But a look at the panther mortality map supplied by the Florida Fish and Wildlife Conservation Commission containing locations of panther roadkill in Southwest Florida where GPS points have been identified,

shows that panthers use the entire area north of I-75 (a proposed terminus for the Southwest Florida Connector). Public and private lands are used indiscriminately by panthers – subject to their need for shelter, roadless conditions, denning opportunities, and dry ground. The avoidance areas noted on the FDOT map are completely divorced from the way panthers actually use this habitat.



But even if the new Southwest Florida Connector could be built more safely than other area roads with wildlife underpasses (although those are, of necessity, impossible at interchanges), it would do nothing for the increased traffic on existing roads – and those that would be built to serve the new communities that M-CORES would facilitate. That “sprawl-inducement” was a chief concern of the FWS biologist, John Wrublik, and a major concern for this organization. The highways will greatly expand the developed footprint of Southwest Florida in the areas it passes through. Examples of this process in Florida abound. Much as the I-4 Corridor through Central Florida is now far more than just the highway – and the Homestead Extension of the Florida Turnpike converted rapidly from

agriculture to dense suburbia once the highway was built. The numerous projects on the table for panther habitat will be greatly facilitated by the construction of this highway should it come to pass. And that means more panther roadkill – but also less available habitat, more intraspecific aggression and mortality over territories (with the exception of mating males and females and a female raising kittens, panthers are solitary and highly territorial animals), and a greatly reduced prey base. Developers will be very happy to have the taxpayers and bond-buyers pay for a red carpet to their properties to make future development easier. Southwest Florida's wildlife – and that includes dozens of other species besides the panther (a well-known “umbrella species”) – will not.

Short excerpts from two science papers on panther use of the Southwest Florida landscape summarize the above concerns:

“Because there is less panther habitat remaining than previously thought, we recommend that all remaining breeding habitat in south Florida should be maintained, and the current panther range should be expanded into south-central Florida.”

Landscape Analysis of Adult Florida Panther Habitat, 2015, Robert A. Frakes, et al

“The Primary, Dispersal and Secondary zones comprise essential components of a landscape-scale conservation plan for the protection of a viable Florida panther population in south Florida. Assessments of potential impacts of developments should strive to achieve no net loss of landscape function or carrying capacity for panthers within the Primary Zone or throughout the present range of the Florida panther.

How much is enough? Landscape-scale conservation for the Florida panther, 2006, Randy Kautz, et al

Panther habitat in Southwest Florida is referred to as a “mosaic” of habitats. It includes wetlands and uplands, forested and open lands, public and private land, agricultural, natural, and even lightly developed

lands. Virtually all panther scientists believe the habitat is already “at capacity” – meaning ALL remaining habitat is essential. We feel strongly that a jeopardy opinion (indicating likelihood of extinction for the Florida panther) is the correct one to be offered by the FWS in relation to this project when it gets to their desk.

One final point with regard to the above statement and the anticipated federal review of M-CORES. The State of Florida has so far done nothing in the way of scientific assessment of this project and its impact on the endangered Florida panther – informal discussions in the taskforce meetings notwithstanding. However, eventually the project will require federal wetland permits. It will cross streams and rives and likely go through federal jurisdictional wetlands triggering the need for a wetland permit from the Army Corps of Engineers. When that occurs, we strongly urge FDOT as the main applicant to ask the Corps to prepare an Environmental Impact Statement (EIS) for the entire project – approximately 320 miles from Collier County to the Florida-Georgia border. And not try to isolate all of the individual federal permits which will be required into separate projects. The impacts to surface hydrology, underground aquifers, springs, parks, conservation lands, wildlife and wildlife habitat, will be extensive from this project. It deserves a full EIS from the Army Corps – as well as the comprehensive Biological Opinion from the U.S. Fish and Wildlife Service that that review will trigger.

Best regards,

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