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**Acquisitions and Restoration Council
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000**

VIA EMAIL

Re: Proposed land swap (Item 4 on the May 21 agenda)

Dear Council Members:

St. Johns Regional Audubon (SJRA) was astonished to learn that the Acquisition and Restoration Council is considering a proposal to approve a swap of a contiguous 600-acre strip of land in the Guana River Wildlife Management Area (Guana WMA or WMA) for a constellation of smaller parcels across the state at its May 21st meeting.

As the local Audubon Chapter in the area where the Guana WMA is located, and as frequent visitors of the WMA, we are surprised by the lack of useful information contained in materials provided within your agenda. These documents appear to have been hurriedly prepared and do not address crucial issues. Specifically, they fail to discuss what a unique resource the Guana WMA is, and they fail to adequately address the environmental impacts that removing a 600-acre strip of the WMA would have on the remainder of this ecologically precious area.

We note that the proposal simply makes an argument that there will be a “net positive conservation benefit” because there will be a 5 to 1 exchange in the number of acres. We do not understand how a simple gross acreage comparison is sufficient for a “net positive conservation benefit” finding. In our view, the relative conservation cost/benefits of each tract should be considered. Biologically, large tracts of connected conservation lands do far more for species preservation than tiny dispersed plots.

With respect to the Guana WMA, we urge you consider:

1. In response to Question No. 5 regarding the list of imperiled and other wildlife species on the Guana WMA tract, the FWC report states that “extensive wildlife surveys have not been formally conducted.” While this technically may be true, in 2019, a 100-acre adjacent tract called the Outpost was subject to a re-zoning process (that failed) in St. Johns County and a large amount of information was placed before the St. Johns Zoning and Planning Division and ultimately the County Commission about the flora and fauna of the area. That information should be readily available.
2. Audubon Florida did a quick comparison of the bird species found in the Guana WMA with the FWC’s Statewide Wildlife Action Plan and found over 80 species of birds listed in the Action Plan use the Guana WMA tract at issue to forage, roost

and/or breed.¹

3. The area in question is adjacent to one of the waterbodies that has been designated as “impaired” in the Guana River watershed – which is particularly alarming for a body of water that has also been designated as an Outstanding Florida Water. The SJRA is one of the groups that helped fund the initial research a few years ago to determine if there was an impairment problem, so we are particularly concerned about the effect that any development at the 600-acre tract could have on the deteriorating water quality.
4. There is no discussion of archeological resources, except to state there was an “absence of findings.” (Answer to No. 6, pg. 15) This begs the question of what the search for information entailed. In fact, there is a long history of human occupation from prehistoric/ historic periods, significant cultural resources (Timucua Indian settlements), and a British indigo plantation in the Guana WMA.²
5. In addition, the report provides no real information on how a 600-acre strip cut out of the north end of the Guana WMA would affect the remaining portions of the WMA. For example, how would the cut-out affect recreational uses (hunting, birdwatching, kayaking, etc.)? The documents provided with the agenda simply revert to the number of acres to be exchanged (Answer to No. 8, pg. 15). There is also no acknowledgement that development of this strip will further complicate the WMA land managers’ attempts to do controlled burns in the adjacent areas. This practice is essential to managing ecosystems in Florida and is already challenging due to the residential development west of the WMA.

The Guana WMA is one of the greatest ecological treasures in Northeast Florida. Stunning in its natural beauty, the WMA provides critical habitat for countless species of wading birds and animals, and provides increasingly rare recreational opportunities for thousands of Florida residents and visitors. Please do not recommend approval of this swap.

Respectfully submitted,

Amy S. Koch
President

About us

Our 800+ member chapter works to educate residents and visitors in northeast Florida about our splendid bird population and to promote the protection of the habitat necessary for our native and migratory birds to thrive.

¹ We would also like to point out that there is an eBird “hotspot” for this area that, as of this writing, shows that 113 bird species have been found. See <https://ebird.org/hotspot/L340747>. This information, which is vetted by experts is publicly available.

² See: <https://www.staugustine.com/story/news/local/2010/03/22/guana-state-park-has-rich-history/16089871007/>