



May 19, 2025

Deputy Secretary Bryan Bradner  
Chair, Acquisition and Restoration Council  
Land and Recreation, Department of Environmental Protection  
3900 Commonwealth Blvd., MS 44  
Tallahassee, FL 32399-3000  
SUBMITTED VIA EMAIL

**RE: SURFRIDER FOUNDATION URGES THE ACQUISITION AND RESTORATION COUNCIL TO RECOMMEND REJECTION OF ITEM 4  
GUANA RIVER WILDLIFE MANAGEMENT AREA EXCHANGE**

Dear Deputy Secretary Bradner,

Please accept the following letter from the Surfrider Foundation in strong opposition to the proposed Guana River Wildlife Management Area (WMA) Exchange, Item 4 on the Acquisition and Restoration Council's May 21 meeting agenda. The Surfrider Foundation is a national grassroots environmental organization dedicated to the protection and enjoyment of the world's ocean, waves, and beaches for all people. Our national volunteer network of more than 200 chapters and clubs protect thousands of miles of U.S. coastline through education, advocacy, and stewardship. Our twelve Florida volunteer-led chapters stretch across the state from the First Coast to the Florida Keys to Orlando to the Emerald Coast. Surfrider First Coast members and supporters enjoy the Guana River WMA for its recreational coastal hiking and wildlife viewing opportunities, which provide an all too rare natural slice of wild Florida.

We are writing to express our strong opposition to the Guana River WMA Exchange and respectfully request the Council recommends rejecting the land swap proposal at the upcoming May 21 meeting. The proposed land exchange eliminates regional public outdoor recreational opportunities, jeopardizes regional coastal resiliency and ecological functioning, and contravenes the state's conservation commitments and goals. **Moreover, the proposed exchange is illegal because it does not meet the standards provided in the Florida Constitution and Florida Statute,** as it fails to demonstrate the property is no longer needed for conservation purposes, contradicts the plain meaning of the statute regarding "contiguous" exchanges, and does not result in a net positive conservation benefit.<sup>1</sup>

**Guana River WMA Exchange Eliminates Regional Public Outdoor Recreational Opportunities**

Guana River WMA is a beloved destination for Floridians and state visitors alike for a wide range of recreational opportunities and experiences. The public engages in hiking, fishing, paddling, birdwatching, and hunting throughout the WMA. Members of Surfrider's First Coast and Volusia

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<sup>1</sup> See Fla Const. Art. X, Sect. 18; Fla. Stat. §§ 253.0341 & 253.42(4).

Flagler Chapters frequently visit the WMA and spend time hiking, paddling, and birdwatching throughout the WMA, including within the 600 acres designated for the exchange. The area is known as a preeminent birdwatching destination, with over 220 species recorded including waterfowl, egrets, herons, roseate spoonbills, and Peregrine falcons.<sup>2</sup> The proposed exchange would eliminate a public hiking trail and likely impede waterfowl hunting, a popular activity on Guana Lake in the WMA. The proposed parcel for exchange cuts down the heart of the Guana River WMA and would fundamentally alter this wild space and what it offers the public. Floridians and visitors seek out and enjoy our state's undeveloped lands because they provide incredible opportunities to be in and experience wild landscapes that are increasingly rare in a state of exponential growth. Time and time again, Floridians have spoken out in defense of our undeveloped lands and called upon state leaders to uphold their commitments and the will of the people to keep these lands wild and protected for public use.

### **Guana River WMA Exchange Jeopardizes Regional Coastal Resiliency and Ecological Functioning**

Guana River WMA is located in St. Johns County, which is recognized as one of the fastest growing counties in Florida and the United States.<sup>3</sup> The 600 acres designated for the land exchange stretch vertically from the northern end of the WMA. The 600 acres consist of hammocks, flatwoods, swamps, and marsh. Undeveloped lands and wetlands provide integral ecological functions that bolster the protection of the surrounding communities and help maintain the integrity of the surrounding watershed. These critical functions include flood control, stormwater runoff storage, and water purification through natural filtration.

Situated just miles from the Atlantic Ocean to the east and high-population density areas to the north and west, the undeveloped lands in Guana River WMA serve as natural buffers for flooding and sea level rise. In just the last decade, St. Johns County has experienced multiple hurricanes bringing significant rainfall and storm surge. Notably, in 2016, Hurricane Matthew resulted in a storm surge up to seven feet causing widespread flooding and destruction.<sup>4</sup> In flood-prone areas, wetlands serve a particularly pivotal role in stormwater runoff mitigation and flood reduction. Every acre of wetland can store an estimated one million gallons of water.<sup>5</sup> Several studies have calculated significant economic benefits from coastal wetlands' contributions to reducing property and infrastructure damage during severe weather.<sup>6</sup> With accelerating sea level rise and

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<sup>2</sup> *Guana River Wildlife Management Area*, The Great Florida Birding and Wildlife Trail, <https://floridabirdingtrail.com/site/guana-river-wildlife-management-area/>.

<sup>3</sup> *About St. Johns County*, JAXUSA Partnership, <https://jaxusa.org/the-region/st-johns-county/>.

<sup>4</sup> *St. Johns Hurricane Preparedness Guide*, St. Johns County, [https://stjohns.floridahealth.gov/programs-and-services/emergency-preparedness-and-response/\\_documents/hurrprepguide.pdf](https://stjohns.floridahealth.gov/programs-and-services/emergency-preparedness-and-response/_documents/hurrprepguide.pdf).

<sup>5</sup> *Basic Information about Wetland Restoration and Protection*, U.S. EPA, <https://www.epa.gov/wetlands/basic-information-about-wetland-restoration-and-protection>.

<sup>6</sup> See Robert Costanza et. al, *The Global Value of Coastal Wetlands for Storm Protection*, 70 Global Envl. Change 102328 (2021), <https://www.sciencedirect.com/science/article/pii/S0959378021001072>; F. Sun, & R.T. Carson, *Coastal Wetlands Reduce Property Damage During Tropical Cyclones*, Proc. Natl. Acad.

increasing frequency and intensity of storms posing challenges for Florida, and St. Johns County, protecting and maintaining undeveloped coastal lands like the designated parcel in Guana River WMA must be a priority.

The designated 600 acres are in close proximity to the Guana Tolomato Matanzas National Estuarine Research Reserve,<sup>7</sup> a nationally-designated estuary recognized for its ecological significance, and Guana River, an Outstanding Florida Water.<sup>8</sup> In 2022, the Florida Department of Environmental Protection listed the Guana River as an impaired water, due to failed water quality assessments, and began the mandatory restoration process pursuant to the Clean Water Act.<sup>9</sup> A 2025 study establishing a baseline assessment of the estuary's degraded water quality highlights the proximity to intense urbanization and significant development in Ponte Vedra.<sup>10</sup> In particular, the study notes neighborhood and golf course lagoons as contributing to runoff and pollutants entering the watershed.<sup>11</sup> Permitting the exchange of 600 acres of Guana River WMA could lead to more development within the heart of the WMA, further jeopardizing water quality and the restoration of the Guana River and surrounding watershed.

### **Guana River WMA Exchange Contravenes State Conservation Commitments and Goals**

Florida's State Comprehensive Plan sets forth clear priorities for the acquisition and management of coastal lands.<sup>12</sup> In particular, for coastal and marine resources, it sets forth the goal of ensuring that development in coastal areas does not endanger important natural resources.<sup>13</sup> The policies set forward to achieve this goal include accelerating the acquisition of public coastal land where it is necessary to protect coastal and marine resources and avoiding the expenditure of state funds to subsidize development in high-hazard coastal areas.<sup>14</sup> The proposed Guana River WMA

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Sci. U.S.A. 117(11) 5719-5725 (2020), <https://doi.org/10.1073/pnas.1915169117>; Siddharth Narayan et. al, *Coastal Wetlands and Flood Damage Reduction: Using Risk Industry-based Models to Assess Natural Defenses in the Northeastern USA*, Lloyd's Tercentenary Research Foundation (2016),

[https://www.nature.org/content/dam/tnc/nature/en/documents/Coastal\\_wetlands\\_and\\_flood\\_damage\\_reduction.pdf](https://www.nature.org/content/dam/tnc/nature/en/documents/Coastal_wetlands_and_flood_damage_reduction.pdf); Edward B. Barbier et. al, *The Value of Wetlands in Protecting Southeast Louisiana from Hurricane Storm Surges*, PLoS ONE (2013),

<https://journals.plos.org/plosone/article/metrics?id=10.1371/journal.pone.0058715>.

<sup>7</sup> Guana Tolomato Matanzas National Estuarine Research Reserve, <https://gtmnerr.org/>.

<sup>8</sup> Outstanding Florida Waters, Florida Department of Environmental Protection: Geospatial Open Data, <https://geodata.dep.state.fl.us/datasets/FDEP::outstanding-florida-waters/about>.

<sup>9</sup> *Local Impairments: Guana Estuary*, National Estuarine Research Reserve System Science Collaborative (2022), [https://nerrsciencecollaborative.org/sites/default/files/resources/FINAL\\_Guana-Nutrients-Impairment.pdf](https://nerrsciencecollaborative.org/sites/default/files/resources/FINAL_Guana-Nutrients-Impairment.pdf).

<sup>10</sup> Nicole G. Dix et. al, *Assessing Water Quality in the Impounded Guana Estuary: A Baseline with Implications for Future Management*, 216 Marine Pollution Bulletin 117968 (2025), <https://www.sciencedirect.com/science/article/pii/S0025326X25004436?via%3Dihub>.

<sup>11</sup> *Id.*

<sup>12</sup> Fla. Stat. § 187.201(8).

<sup>13</sup> Fla. Stat. § 187.201(8)(a).

<sup>14</sup> Fla. Stat. § 187.201(8)(b)(1, 3).

exchange contravenes these policies. Trading irreplaceable undeveloped coastal lands in the Guana River WMA makes these lands vulnerable to development that would endanger surrounding natural resources.

Over the last three decades, the State has invested in the protection and restoration of this public land with taxpayer funds. In 1984, the State paid \$48 million for the lands that comprise Guana River WMA, which breaks down to an estimated \$2.88 million for 600 acres in 1984. Adjusting for inflation today, that is an estimated \$8.87 million initial investment by the state – with taxpayer funds – for land preservation and public use, not even taking into account the continued financial investment over the last 30 years. Allowing the parcel to transfer to private ownership undercuts the substantial investment of taxpayer funds and presents a high likelihood of development on these 600 acres surrounded by high-hazard coastal areas.<sup>15</sup> If the State allows the Guana River WMA Exchange, we will be losing public coastal land that serves an important role in the protection of coastal and marine resources contrary to State Comprehensive Plan goals and commitments.

#### **Guana River WMA Exchange – Removing 600 Acres from Guana River WMA from Public Ownership – Violates the Florida Constitution and Florida Statutes Governing Conservation Lands**

The Florida Constitution and Florida statutes governing conservation land and land exchange proposals from private owners set forth criteria that must be met before allowing a change that results in the disposition of state land. The proposed Guana River WMA Land Exchange fails to meet required criteria set forth in the law. First, the Florida Constitution and Florida Statute section 253.0341 require a finding that protected conservation land is no longer needed for conservation purposes before its disposition. Second, the plain meaning of Florida Statute section 243.42(4) only contemplates exchanges of contiguous land parcels, not exchanges of non-contiguous parcels. Third, Florida Statute section 243.42(4)(b) requires a demonstration of net positive conservation benefit in the proposed exchange. The proposed Guana River WMA Land Exchange does not meet these requirements and should be removed from consideration or rejected.

##### ***i. The Proposed Exchange Fails to Meet the Threshold Requirement for the Disposition of Conservation Lands Because the 600 Acres in Guana River WMA are Necessary for Conservation Purposes***

The Florida Constitution Section 18, Article X, establishes that state-owned land designated for conservation purposes may only be disposed of if there is a determination that the “property is no longer needed for conservation purposes.”<sup>16</sup> Florida Statute section 253.0341(1) elaborates

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<sup>15</sup> See Fla. Stat. § 163.3178(2)(h); *St. Johns County Coastal High Hazard Area*, St. Johns ArcGIS, <https://www.arcgis.com/home/item.html?id=dba820b993994b289d49de6504a48d4d>.

<sup>16</sup> Fla. Const. Art. X, Sect. 18.

that the ARC must make a recommendation for any conservation land that may be disposed, and the board of trustees will determine whether “the lands are no longer needed for conservation purposes.”<sup>17</sup>

The proposed exchange, the accompanying Staff Report, and the agency letter from Florida Fish and Wildlife Commission (FWC) provide no indication that the 600 acres in Guana River WMA are no longer needed for conservation purposes. Moreover, the acquisition of Guana River WMA and the WMA’s most recent management plan, updated by FWC and approved by the ARC just two years ago in 2023, demonstrate significant, ongoing conservation purposes for this land.

The Guana River WMA was acquired through the Conservation and Recreation Lands (CARL) Program. The CARL Program was established for the purpose of purchasing *environmentally endangered lands* and other lands, such as those with the potential for public recreation.<sup>18</sup> With respect to the acquisition of the Guana River WMA through CARL, “[t]he acquisition intent was to conserve and protect *the stellar natural and cultural resources of the area* and to provide opportunities for resource-based public recreation. For these reasons, the CARL Committee determined that lands within what is now the GRWMA are *ideally suited to these purposes given the abundance and excellent condition of the myriad natural and cultural resources that exist on the property.*”<sup>19</sup> In summarizing its proposal for acquisition in 1983, the CARL Committee recognized the unique and abundantly rich and diverse quality of resources present at the WMA.<sup>20</sup>

**It is unusual for a single proposed project area to combine such a diversity of valuable natural, cultural, and recreational resources. These include: (1) excellent ocean-front beach with high dunes stabilized by natural vegetation; (2) an unusually extensive natural area of undisturbed Atlantic coastal strand (scrub) vegetation; (3) extensive maritime hammock containing an unusual natural association of mature trees; (4) extensive estuarine wetlands (marsh); (5) extensive areas of pine flatwoods; (6) bird rookeries, including a sizable population of the endangered wood stork; and (7) extensive aboriginal middens, aboriginal burial mounds, and artifacts of aboriginal and Spanish colonial (origin).**

The FWC’s 2023-2033 Management Plan for the WMA further details the myriad species (including imperiled plant and wildlife species), habitats, and cultural resources present.<sup>21</sup> “The GRWMA contains a rich diversity of unique natural features that include tidal salt marshes, lakes, hammocks, and flatwoods habitats. [ . . . ] Prominent imperiled wildlife species that reside or migrate on the area include, but are not limited to, the wood stork (*Mycteria americana*), black

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<sup>17</sup> Fla. Stat. § 253.0341(1).

<sup>18</sup> Florida Fish and Wildlife Conservation Commission, *2023-2033 Management Plan for the Guana River Wildlife Management Area 9* (2023) (emphasis added), available at <https://myfwc.com/media/2kglyje2/grwma-part1.pdf>, and attached as Exhibit 1.

<sup>19</sup> *Id.* (emphasis added).

<sup>20</sup> *Id.* (emphasis added).

<sup>21</sup> *Id.*

skimmer (*Rynchops niger*), gopher tortoise (*Gopherus polyphemus*), and little blue heron (*Egretta caerulea*).<sup>22</sup>

As FWC has recognized, the WMA provides “important water quality and floodplain protection for the region’s rivers and wetlands. Simultaneously, the area also provides exceptional fish and wildlife-based public outdoor recreational opportunities including hunting, fishing, wildlife viewing, hiking, paddling, and horseback riding.”<sup>23</sup> FWC also recognizes the conservation significance of Guana River WMA to the surrounding watershed stating, “[d]ue to the high quality of the aquatic habitats within the Guana River tract, which encompasses the GRWMA, the Guana River tract was designated as the Guana River Marsh Aquatic Preserve in 1985.”

The Guana River WMA also includes 26 archaeological sites and one historic cemetery.<sup>24</sup> The precise locations of these sites are not public to protect them from looting or unauthorized excavation; however, there should be greater attention to their existence and assessment of potential negative impacts due to the proposed exchange in the Applicant Questionnaire and Staff Report.<sup>25</sup>

Moreover, as provided in the most recent potential surplus review in the WMA’s 2023-2033 Management Plan, FWC determined that “**all portions of the area are being managed and operated for the original purposes of acquisition and remain integral to the continued conservation of important fish and wildlife resources and continue to provide good fish and wildlife-based public outdoor recreational opportunities**. Therefore, no portion of the GRWMA is recommended for potential surplus review.” **To repeat, the Florida Fish and Wildlife Conservation Commission has already determined that all portions of the Guana River WMA are “integral” to the continued conservation of important fish and wildlife resources of the WMA.** Merriam Webster’s dictionary defines “integral” as “essential to completeness.”<sup>26</sup> Therefore, there is no question the 600 acres proposed for exchange are essential to the Guana River WMA. And in fact, the FWC identified the need to *acquire* two inholdings, which present development threats, and add them into the WMA in the 2023-2033 WMA Management Plan.<sup>27</sup>

The record of Guana River WMA’s acquisition and the WMA’s 2023-2033 Management Plan present overwhelming evidence of the property’s conservation significance and ongoing purpose. Accordingly, the proposed exchange fails to meet the threshold requirement for a finding that the

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<sup>22</sup> *Id.*, at p. 1.

<sup>23</sup> *Id.*

<sup>24</sup> *Id.*, at p. 32. In particular, the site entitled “Palm Valley,” suggests it might be in the same region or area as the proposed exchange property.

<sup>25</sup> See “ARC Questionnaire – Guana River Wildlife Management Area Proposed Land Exchange,” Item 4 Guana River WMA Exchange Packet 15 (2025), [https://floridadep.gov/sites/default/files/2025-05/Item04\\_Guana\\_River\\_WMA\\_Exchange.pdf](https://floridadep.gov/sites/default/files/2025-05/Item04_Guana_River_WMA_Exchange.pdf).

<sup>26</sup> Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/integral>.

<sup>27</sup> Florida Fish and Wildlife Conservation Commission, *2023-2033 Management Plan for the Guana River Wildlife Management Area* 78 (2023) (Section 6.4), available at <https://myfwc.com/media/2kglyje2/grwma-part1.pdf>, and attached as Exhibit 1.

land provides no conservation purpose, and the proposed exchange should be rejected by the ARC.

*ii. The Proposed Exchange Contradicts the Plain Meaning of the Statute Governing Exchange Proposals from Private Landowners Because It Relies on the Exchange of Non-Contiguous Parcels*

The Florida law governing land exchange proposals from private property owners is specific in its language and narrowly constrained to the exchange of contiguous land parcels. The proposed Guana River WMA Land Exchange does not adhere to the plain meaning of the statute because it contemplates the exchange of non-contiguous parcels (land parcels elsewhere in St. Johns, Osceola, Volusia, and Lafayette Counties) for the desired state-owned land (600 acres in Guana River WMA). Accordingly, the proposed exchange does not meet the statutory requirements for eligibility and must be removed from consideration or rejected.

Florida Statute section 253.42(4)(a) states:<sup>28</sup>

A person who owns land contiguous to state-owned land titled to the board of trustees may submit a request to the Division of State Lands to exchange all or a portion of **the privately owned land** for all or a portion of **the state-owned land**, whereby the state retains a permanent conservation easement over all or a portion of the exchanged state-owned land and a permanent conservation easement over all or a portion of the exchanged privately owned land. State-owned land **exchanged** pursuant to this subsection ***shall be contiguous to the privately owned land*** upon which the state retains a permanent conservation easement.

The statutory language and repeated use of “the” when referencing the specific parcels deliberately constrains the eligible land for exchange to the contiguous privately owned and state-owned land parcels. Moreover, the statute is clear that the state-owned land “exchanged” *shall be contiguous* to the swapped privately owned land. If the Florida Legislature had intended this statute to allow private landowners to propose the exchange of non-contiguous parcels, then the statute would have utilized different wording and clearly addressed that broader permission. It is not enough that a private property owner owns land next to other state-owned land; the properties exchanged must be *contiguous with each other*.

The proposed exchange contradicts the plain meaning of the statute because it does not contemplate the trade of contiguous land parcels – it proposes private ownership of 600 acres of Guana River WMA in exchange for four other land parcels in different parts of the state. The Staff Report acknowledges the applicant’s ownership of 104.47 acres in St. Johns County that are contiguous to Guana River WMA; however, that parcel is not part of the proposed land exchange. The eligibility analysis ends prematurely by not applying the full extent of the statutory

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<sup>28</sup> Fla. Stat. § 253.42(4)(a) (emphasis added).

requirement, which precludes the exchange of non-contiguous parcels. The proposed exchange fails to meet the statutory criteria and must be withdrawn from consideration or rejected.

**iii. *The Proposed Exchange Fails to Demonstrate a Net Positive Conservation Benefit***

Florida law requires a finding of a net positive conservation benefit in land exchanges proposed by a private owner of land contiguous to state-owned land.<sup>29</sup> The exchange proposal only considers total acreage in its assessment of the net conservation benefit. The assessment does not provide more detail regarding ecological trade-offs and analysis, particularly the specifics in exchanging a coastal parcel for inland parcels, the diverse species and habitat supported on the Guana River WMA parcel, and the designated parcel's significance in the overall connectivity and integrity of the surrounding estuary system and watershed.

Florida Statute section 253.42, must be read and interpreted consistently with Section 253.001, which requires that all lands held by the board of trustees *shall continue to be held in trust for the use and benefit of the people of the state* pursuant to Section 7, Article II, and Section 11, Article X of the State Constitution.<sup>30</sup> Those Constitutional protections include:

*It shall be the policy of the state to conserve and protect its natural resources and scenic beauty. Adequate provision shall be made by law for the abatement of air and water pollution and of excessive and unnecessary noise and for the conservation and protection of natural resources.*<sup>31</sup>

The title to lands under navigable waters, within the boundaries of the state, which have not been alienated, including beaches below mean high water lines, is held by the state, by virtue of its sovereignty, in trust for all the people. Sale of such lands may be authorized by law, but only when in the public interest. Private use of portions of such lands may be authorized by law, but only when *not contrary to the public interest*.<sup>32</sup>

Accordingly, the Guana River WMA is held by the state in trust for the use and benefit of the public, and Florida's Constitution prioritizes the protection of the state's natural and scenic resources and protection of water quality in our public trust waterways. These requirements set a high bar for any section 253.42 "exchange," and require a strict and limited application of section 253.42.

Merely comparing the acreage of land exchanged does not meet this high bar, nor does it demonstrate a net positive conservation benefit.

Goals identified in FWC's 2023-2033 Management Plan for Guana River WMA include a variety of management goals and objectives related to protecting the WMA's species and habitats,

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<sup>29</sup> Fla. Stat. § 253.42(4)(b)(3.).

<sup>30</sup> Fla. Stat. § 253.001; Fla. Const. Art. II, Sect. 7(a); Fla. Const. Art. X, Sect. 11.

<sup>31</sup> Fla. Const. Art. II, Sect. 7(a) (emphasis added).

<sup>32</sup> Fla. Const. Art. X, Sect. 11 (emphasis added).





maintaining public access and recreational opportunities, and improving hydrological functioning and restoration. More specifically, these goals include:

- maintaining, improving, or restoring imperiled species populations and habitats;<sup>33</sup>
- maintaining public access and recreational opportunities, and continuing to implement the Recreation Master Plan and providing updates if new acquisitions or other factors warrant them;<sup>34</sup> and
- protecting water quality and quantity, restoring hydrology to the extent feasible, and maintaining the restored condition.<sup>35</sup>

Exchanging 600 acres of the WMA, particularly where it appears those 600 acres would be privately developed, contravenes and frustrates these goals.<sup>36</sup>

The Staff Report for this proposed exchange simply fails to show a net positive conservation benefit from disposing of 600 acres of this rich and vital coastal WMA, and Surfrider asserts that the Acquisition and Restoration Council cannot legally do so. Additionally, although the Staff Report characterizes the accompanying FWC memo as a “concurrence” with the proposed exchange, the memo itself is an unsigned, undated one-page summary of the parcels in the proposed exchange and an acknowledgement that the authority to review and decide on the disposition of the proposed exchange rests with the ARC and the board of trustees.<sup>37</sup>

The acquisition of important public conservation land must not be at the expense of losing irreplaceable public lands elsewhere in the state. Acquisitions should be made using the state’s robust and successful existing programs like Florida Forever and the Rural and Family Lands Protection Program. These programs offer a thoughtful and deliberate process for prioritizing and acquiring key lands for conservation.

On behalf of Surfrider’s Florida members and supporters, we implore you to recommend rejecting Item 4 Guana River WMA Exchange, in order to uphold Florida law governing public conservation lands, and to safeguard public outdoor recreational opportunities, coastal resiliency, and the state’s conservation commitments and goals.

Thank you for considering the public interests represented by the Surfrider Foundation.

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<sup>33</sup> Florida Fish and Wildlife Conservation Commission, *2023-2033 Management Plan for the Guana River Wildlife Management Area 69-70* (2023) (Section 5.2), available at <https://myfwc.com/media/2kglyje2/grwma-part1.pdf>, and attached as Exhibit 1.

<sup>34</sup> *Id.*, at p. 71-72 (Section 5.5).

<sup>35</sup> *Id.*, at p. 72-73 (Section 5.6).

<sup>36</sup> As just one example, development would foreseeably result in additional nutrient and other harmful runoff into WMA waterways, harming water quality and public trust resources.

<sup>37</sup> See “FWC Memorandum to FDEP Division of State Lands,” Item 4 Guana River WMA Exchange Packet 13 (2025), [https://floridadep.gov/sites/default/files/2025-05/Item04\\_Guana\\_River\\_WMA\\_Exchange.pdf](https://floridadep.gov/sites/default/files/2025-05/Item04_Guana_River_WMA_Exchange.pdf).



Sincerely,

**Katie Bauman**

Florida Policy Manager, Surfrider Foundation

**Evan Orellana**

Florida & Puerto Rico Regional Manager, Surfrider Foundation

**Elijah Cunningham**

Chair, First Coast Chapter

**Steve Combs**

Chair, Volusia Flagler Chapter

**Leisa M. Bee**

Chair, Treasure Coast Chapter

**Lauren Bintz**

Chair, Orlando Chapter

**Karen Doyle**

Acting Chair, Emerald Coast Chapter

**Gillian Eckert**

Chair, Broward County Chapter

**Mike Gibaldi**

Acting Chair, Miami Chapter

**Sabrina Hall**

Chair, Paradise Coast Chapter

**Molly Hietapelto**

Acting Chair, Palm Beach County Chapter

**Nina Hunt**

Chair, Space Coast Chapter

**Michael Norton**

Chair, Suncoast Chapter

**Katie Cleek**

Chair, Florida Keys Chapter

**Surfrider Members & Supporters:**

Alan Davis

Alex Perrin

Alexis Asplundh

Alexis Kampmeyer

Ali Otoy

Alice Windle

Allison Creveling

Alyona Knox

Amaya Fong

Andrea Koegler

Andrew Bowlin

Andrew Suarez

Anna Bauman

Anne Bloch

Annelise Rouxel

Anthony Mariano

Ashley Albani

Avery Metts

Barbara Austin

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Greg Bauman

Greg Olsen

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Helena Milazzo

Jack Milazzo

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Valerie Jordan  
Vicki Schuller  
Virginia Vega Lomis  
Yuichi Takao

**CC:**

Lynetta Griner, Usher Land & Timber, Inc.  
George Warthen, FWC  
Rick Dolan, FDACS  
Alissa Lotane, DOS  
Bill Palmer, Tall Timbers Land Conservancy  
Elva Peppers, Florida Environmental and  
Land Services, Inc.  
Will Watts, FDOT  
Joshua Gamblin, Stolen Saddle Ranch

Hank Vinson, FDEP  
Andrew Fleener, FDEP  
Laramie Ferry, FWC  
Catherine Ingram, FDACS  
Brandon Ackermann, DOS  
Sine Murray, FDEP  
Meghan Lauer, FDEP  
Keith Singleton, FDEP  
James Parker, FDEP