## **Addendum to Save the Mantee Club Critical Habitat Comment**

Additional Locations for Consideration that Contain the Physical and Biological Features of Critical Habitat Designation

The critical habitat designation asks for information regarding any additional areas occurring within the range of either subspecies that are within the jurisdiction of the United States (the Gulf and Atlantic Coasts of the United States for the Florida manatee) that should be included in the designation because they (i) were occupied at the time of listing and contain the physical or biological features that are essential to the conservation of the subspecies and that may require special management considerations or protection, or (ii) were unoccupied at the time of listing and are essential for the conservation of the subspecies. In addition to our recommendations to include Harbor Branch Oceanographic Institute and the entirety of the Ocklawaha River, we recommend including the Ichetucknee River and its confluence with the Santa Fe River in the critical habitat.

## Recommendation

We recommend including the Ichetucknee River and its confluence in the critical habitat, either through the creation of an additional critical habitat unit for the Ichetucknee Head Spring or through the extension of Unit FL-02 Manatee and Fanning Spring northward to encompass the entire Ichetucknee River, which would also act to protect manatee travel corridors in the Santa Fe and Suwannee Rivers.

The proposed extension of Unit FL-02 would begin at the current FL-02 designation at the end of the Suwannee River, continue through the Santa Fe River, and extend to the Ichetucknee River, reaching the head springs in Ichetucknee Springs State Park (Figure 1).

The proposed additional critical habitat unit would encompass the entire Ichetucknee River and adjacent travel corridors. We recommend that the unit extend from Ichetucknee Head Spring in Ichetucknee Springs State Park down the Ichetucknee River approximately 5 miles (8.5 km) to the confluence of the Santa Fe River and extends westward for approximately 13 miles (21.5 km). The unit would also extend eastward along the Santa Fe for approximately 7 miles (11 km) to the confluence of the Suwannee River, then northwest and southward along the Suwannee River for approximately 6 miles (10 km). This unit would include all inshore, manatee-accessible waters below the mean high-water line within approximately 18.6 miles (30 km) of the warm-water site of Ichetucknee Springs (Figure 2).

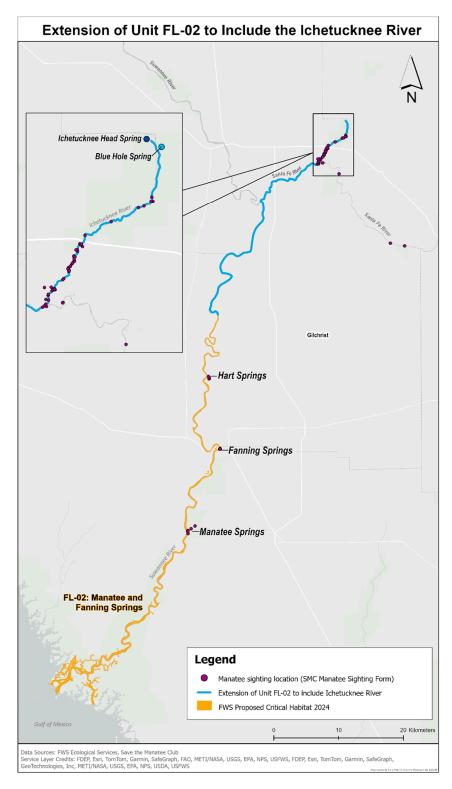


Figure 1: Map showing the potential expansion of the boundaries of Unit FL-02: Manatee and Fanning Springs northward to encompass the Ichetucknee River in blue. Sighting locations of manatees reported via Save the Manatee Club's Manatee Sighting Form between 2022 and 2024 are displayed as pink circles.

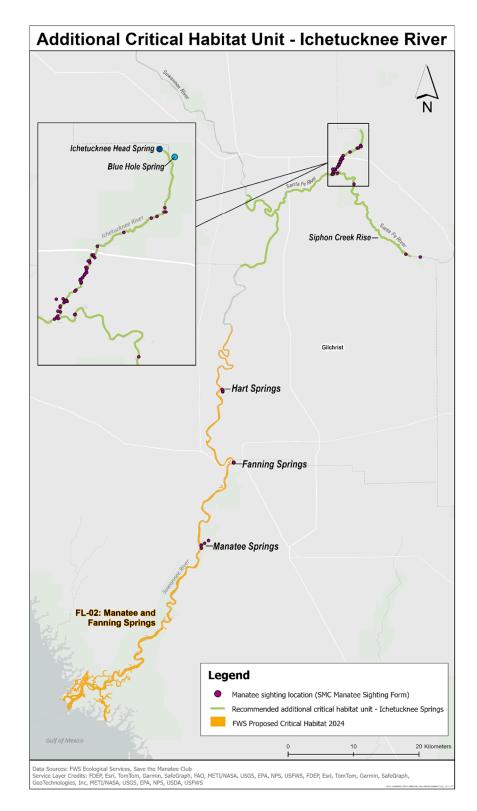


Figure 2: Map showing the potential critical habitat boundaries for an additional critical habitat unit encompassing the Ichetucknee River in green. Sighting locations of manatees reported via Save the Manatee Club's Manatee Sighting Form between 2022 and 2024 are displayed as pink circles.

## **Rationale**

Unit FL-02: Manatee and Fanning Springs of the proposed critical habitat consists of 4,453 ac of springs and rivers in the Big Bend region of the Gulf Coast in Dixie, Levy and Gilchrist Counties, extending approximately 30km north of Fanning Springs. This area of Florida is known as the Florida Springs Heartland due to the abundance of springs discharging in this region. Fanning Springs, a second magnitude spring that discharges into the Suwannee River, is classified as a secondary refuge for manatees by the Florida Manatee Warm-Water Habitat Action Plan. The Suwannee River converges with the Santa Fe River approximately 53 kilometers northward of Fanning Springs. The Santa Fe River, which ends at the confluence with the Suwannee River and flows westward, is the discharge point for at least 36 named springs in the Florida Springs Heartland (Florida Springs Institute, 2018). Also flowing into the Santa Fe River is the Ichetucknee River, a spring-fed river originating at the Ichetucknee Head Spring within Ichetucknee Springs State Park (Figure 3).

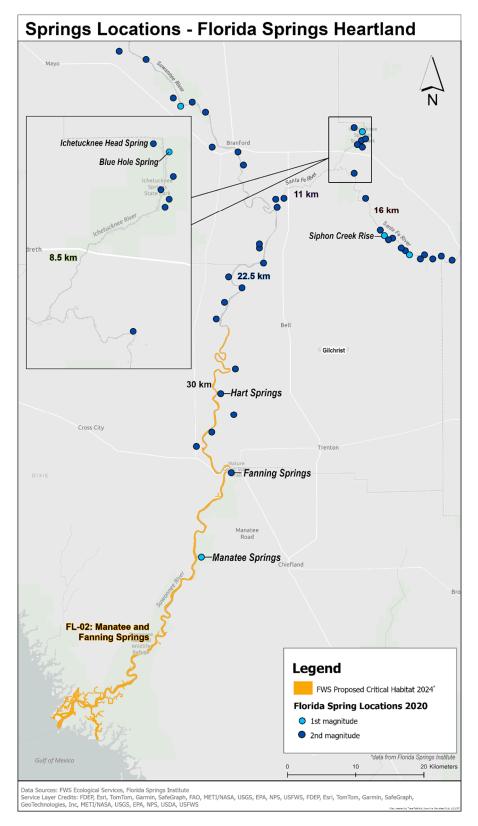


Figure 3: Map showing the locations of manatee accessible first and second magnitude springs in the Florida Springs Heartland.

The Florida Manatee Warm-Water Florida Action Plan (FWC 2020) defines the springs and spring runs of the Ichetucknee River and Santa Fe Rivers as the 'Ichetucknee / Santa Fe River Springs Complex,' located within Columbia, Gilchrist, and Suwannee Counties, as a secondary manatee refuge with 'unpredictable' manatee use. While data on manatee use of these springs is limited, there is considerable evidence that Native Americans hunted manatees along the Santa Fe River, indicating that manatees have used these river systems prior to the eighteenth century (Cumbaa, 1980; Powell & Rathbun, 1984). While manatee numbers in this area are presumed to be low prior to the mid-1900s, manatee conservation laws and reductions in poaching led to an increase in the population of manatees along the Big Bend area of Florida (Powell & Rathbun, 1984). This population increase may be reflected in the manatee sighting data collected by Sam Cole, long-time park biologist at Ichetucknee Springs State Park, who began recording manatee sightings in the Ichetucknee River in 1992. Mr. Cole consistently recorded manatee's use of the Ichetucknee River between 1992 and 2024 across all twelve months of the year, with the number of animals sighted steadily increasing over time (Table 1).

Table 1: Number of manatees observed by Sam Cole, Ichetucknee Springs State Park biologist, between 1992 and 2024.

Year	Number of animals observed		
1992	2		
1993	4		
1994	12		
1995	2		
1996	0		
1997	1		
1998	46		
1999	1		
2000	3		
2001	0		
2002	1		
2003	20		
2004	9		
2005	101		
2006	51		
2007	40		
2008	16		
2009	53		
2010	22		
2011	0		
2012	118		
2013	117		
2014	199		
2015	104		
2016	63		
2017	73		
2018	93		
2019	84		
2020	39		

2021	240
2022	135
2023	64
2024	302

In addition to Mr. Cole's data collection efforts, Save the Manatee Club partnered with Alachua County in 2022 to increase local awareness of manatee use of the Suwannee, Santa Fe, and Ichetucknee Rivers and to encourage the public to report opportunistic manatee sightings. Between 2022 and January 15<sup>th</sup>, 2025, seventy-five sighting reports were submitted via Save the Manatee Club's publicly available manatee sighting form from the Florida Springs Heartland area. Across these seventy-five sighting reports, 212 manatees were observed, 55 of them calves. Fifty-six (75%) of the sightings were reported within the Ichetucknee River and river confluence (Figure X). The majority of manatees sighted were seen between December and March (Table 2).

Table 2: Number of manatees observed in the Florida Springs Heartland by month between 2022 and January 15<sup>th</sup>, 2025, as reported to Save the Manatee Club's Manatee Sighting Form.

	Number of Animals Observed				
Month	2022	2023	2024	2025	
January	2	28	2	24	
February	0	18	3	-	
March	0	14	29	-	
April	13	2	0	-	
May	0	0	6	-	
June	1	7	0	-	
July	1	4	0	-	
August	0	0	0	-	
September	0	0	0	-	
October	7	0	0	-	
November	11	0	0	-	
December	24	9	6	-	

While published data may be limited for this area of Florida, there is unpublished data that indicates the Ichetucknee River is an important warm-water habitat for manatees on Florida's northern Gulf Coast. Expanding FL-02's critical habitat boundary to encompass the Ichetucknee River would also act to protect the many valuable springs that manatees also access along the Suwannee and Santa Fe Rivers. Therefore, we recommend either expanding Unit FL-02 to include the Ichetucknee River or creating an additional critical habitat unit for the Ichetucknee River, to protect the river itself and adjacent travel corridors in the Santa Fe and Suwannee Rivers.

References:

Cumbaa, S.L. 1980. Aboriginal use of marine mammals in the southeastern United States. Southeastern Archaeological Conference Bulletin 17: 6-10.

Powell, J. A. and G. B. Rathbun. 1984. Distribution and Abundance of Manatees Along the Northern Coast of the Gulf of Mexico. Northeast Gulf Science 7 (1). Retrieved from https://aquila.usm.edu/goms/vol7/iss1/1

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