



## **THE WILDLIFE SOCIETY**

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Re: Draft Integrated Predator Management Plan and Environmental Assessment

Dear Anne:

Thank you for the opportunity to submit comments on the Draft Integrated Predator Management Plan (the Plan) and Environmental Assessment (EA) developed by U.S. Fish and Wildlife Service (USFWS) for Florida Keys National Wildlife Refuges (FKNWR). We applaud USFWS for their efforts in designing a predator management plan that addresses a diverse scope of critical threats and provides comprehensive solutions to those threats. In addition, we appreciate the emphasis USFWS has placed on stakeholder involvement and public education and outreach as both a fundamental component in creation of the predator management plan and a method to address threats and impacts through the three alternative management actions.

The Wildlife Society (TWS) was founded in 1937 and is a non-profit scientific and educational association representing over 10,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. The mission of TWS is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and its habitats worldwide.

TWS has taken particular interest in predator management plans on public lands, particularly in relation to invasive and injurious species and threats/ impacts of feral cats on songbird, small mammal, and reptile and amphibian populations nationwide. In addition, it is the position of TWS to “promote the maintenance of biological diversity and ecosystem integrity and oppose the modification and degradation of natural biomes by invasive species.” Maintenance and support of biological diversity is a foundational component of good wildlife management and conservation. TWS continues to support and promote those policies and programs by agencies and organizations designed to conserve biological diversity and we encourage passage and enforcement of new laws, regulations and planning initiatives at state and federal levels that help control the spread of invasive or injurious species.

### **Alternative Management Actions**

- Upon review, we feel that Alternative A – the No Action/Status Quo alternative – *is an unacceptable management strategy* and in direct conflict with the purpose of the Plan.
- Alternative B – the Integrated Predator Management alternative – *is the most acceptable course of action* for a number of reasons. This alternative:

- 1) can be modified over time in response to effectiveness of predator control methods. Monitoring to detect changes is included as part of this alternative. TWS encourages programs to control invasive species capable of modifying native wildlife habitat and affecting biological diversity.
  - 2) involves county government, thereby fostering broader local support;
  - 3) recognizes that trap/neuter/release (TNR) is an unacceptable method for controlling free-ranging and feral cat colonies and strives to completely remove cat colonies through additional means other than lethal methods alone;
  - 4) takes advantage of the additional hours donated by One Animal Family to assist with public education, information dissemination, and other tasks.
- Alternative C – the Lethal Control only alternative – *would not be as effective in reaching Plan goals* as Alternative B. For the Plan to be successful, public support is crucial and likelihood for generating that support is limited if this alternative is selected. In addition, this alternative contains no mention of monitoring impacts of lethal control, making it much more difficult to quantify and defend whether or not future control activities result in acceptable outcomes. Raccoon populations would need to be monitored under Alternative C to ensure subpopulations of this species are not eradicated and to minimize probability of a new mesocarnivore filling the newly opened niche.

While TWS does not support Alternative C, we do recommend that lethal methods be more clearly promoted as a viable option within the Alternative B scenario. A large proportion of targeted feral cats and free-roaming pets may become trap-wary. If monitoring data suggest insufficient population declines of these species through capture/removal activities, lethal control should be implemented. In the event lethal control methods become necessary, several actions should be taken before and during implementation that may help quell the inevitable public outcry. TWS recommends the following:

- Inclusion of lethal methods as a viable option within the Plan;
- Thorough documentation of the inadequacy of non-lethal methods, if present;
- Public education regarding the necessity of and techniques used for lethal control;
- Preparation for a negative, antagonistic response from some publics should be conducted internally for those Refuge personnel directly involved and responsible for implementation of lethal control methods. Personnel should try to understand and empathize with the public's concerns, and be open to consider reasonable alternatives that the public might offer.
- Involvement of Monroe County officials in the decision-making process regarding lethal control.

**Additional comments on the Plan:**

- Section 2.3, first sentence: “This alternative would allow the lethal removal of all targeted species outlined in Section 1.3 above that pose a predation threat to native species, especially those listed as threatened or endangered.” The word “targeted” should be removed as it makes it unclear that all of the predators discussed in Section 1.3 would be candidates for lethal control, including raccoons. That point is not specifically made until Section 4.3.
- Section 4.1, second sentence: “Many species of native wildlife would continue to incur potentially unsustainable levels of mortality or competition by exotic predators, provided that the USFWS did not implement their own predator management program.” The second part of this sentence is confusing. Is it saying that if USFWS did nothing, species would decline, or is it saying that USFWS would consider implementing a predator management plan regardless of the findings of the EA? If it is the former, the word “provided” should be changed to “because.” If it is the latter, more explanation is needed.
- TWS applauds the strong stand taken against TNR and translocation of predators to other natural areas as effective methods of predator control.

- Specific predator population levels and timelines for these levels to be achieved using non-lethal methods described in Alternative B should be included in the Plan. Adaptive management strategies (including lethal measures) should be triggered by data that quantify success or failure of the initial predator removal methods. Adaptive management cannot be achieved without establishment of target levels.
- Enforcement of existing laws should be more prominently discussed in the Plan.
  - The Plan states that pit-tagged or collared animals will be returned to their owners after removal from a Refuge. An increasing punitive scale for repeat offender pet owners should be implemented (e.g., 1<sup>st</sup> offence – animal returned, verbal warning; 2<sup>nd</sup> offense – animal returned, written warning; 3<sup>rd</sup> offense – animal transported to a control facility; additional offenses – fines/prosecution). These penalties should not be exclusive to individual animals, but cumulative for all of an owner’s animals. Merely returning animals to their homes time-after-time does not give any incentive for an irresponsible pet owner to comply with the law.
  - The Monroe County Incidental Take Permit should be modified to strengthen law enforcement capabilities.
  - Public education efforts should include a discussion of applicable laws and their enforcement. This discussion should stress that legal measures would be used in order to achieve successful implementation of the Plan.
  - A system within each Refuge should be developed providing visitors with a method to report sightings of targeted species, including fire ants.
  - A hot-line should be set up for private citizens to anonymously report violations of county ordinances including wildlife feeding, feeding stations, and free-roaming pets.
- If “increased stability of local economies” is indeed an anticipated consequence of Plan implementation under Alternative B, it should be discussed and documented with citations in the text. As it currently reads, it is only given a brief mention in Table 3.
- The Plan should include discussion of how full implementation will be funded.
- Numerous typos, mistakes, and inconsistencies are present throughout the document. These need to be corrected before the Final EA is produced.

We appreciate the holistic planning approach USFWS pursued for the FKNWR Complex and are pleased to see strategic habitat conservation and adaptive management (including monitoring) served as foundation for the preferred management alternative (Alternative B). Thank you for considering the views of wildlife professionals. We look forward to working with you in the future on this and other planning initiatives and hope that the Integrated Predator Management Plan serves as a model for similar planning efforts across the entirety of the National Wildlife Refuge System.

Sincerely,



Thomas J. Ryder  
President