August 28, 2014

Public Comments Processing

Attn: Docket No. FWS-R4-ES-2014-0024

U.S. Fish & Wildlife Headquarters, MS: BPHC

5275 Leesburg Pike

Falls Church, VA 22041-3803

I am submitting comments in response to the U.S. Fish and Wildlife Service’s “90-Day Finding on a Petition To Reclassify the West Indian Manatee From Endangered to Threatened”, Docket No. FWS–R4–ES–2014–0024. I urge the USFWS to maintain the Endangered Species status for the following reasons.

Manatees are a unique, native mammal to Florida. They were originally listed as endangered in 1967 based on the dire threats faced by the species. Those threats still exist and are greater now than they were in 1967. The current Manatee Recovery Plan does not contain objective, measurable criteria associated with the five delisting factors of threat to habitat, overutilization, disease, inadequacy of existing regulations, or the natural or man-made factors. Their very existence continues to be threatened by:

* + Water withdrawals from the Florida aquifer with increasing human populations.
	+ Increasing water quality issues, pollution and algal blooms around the state. (In 2013, 276 manatees died from red tide.)
	+ The uncertainty of Florida power plant operation’s continued availability of warm water.
	+ Lack of identification and protection of food resources and feeding sites near important manatee habitat.
	+ Increasing human and boat populations in Florida will increase boat collisions with manatees. Over the past 6 years manatee deaths from boat collisions averaged 83.6/year, despite long-standing and widespread regulatory zones.
* Over 100 manatees died in 2013-2014 in the Indian River Lagoon during an “Unusual Mortality Event” that is still unexplained.
* The 830 manatees that died in 2013 is a new mortality record and is more than double the average annual mortality.

Clearly, threats to the species have not been reduced, and in fact have increased and expanded. Since 2007 manatee mortality has increased over 50%. I urge USFWS to abandon this proposal and maintain manatee’s status as an endangered species.

Sincerely,

Name, Address inserted