The Honorable Dan Ashe  
Director  
U.S. Fish and Wildlife Service  
1849 C St., NW  
Washington, DC 20240  

RE: Protect the Florida Manatee by Maintaining Classification as Endangered  

I am writing to relay my concerns for the endangered West Indian Manatee, including its subspecies, the Florida Manatee as it relates to the “Petition to Reclassify the West Indian Manatee From Endangered to Threatened” filed by the Pacific Legal Foundation (PLF). I urge you to maintain the Florida Manatee's classification as "endangered," a classification that is clearly required under current environmental conditions and the law.

The Fish and Wildlife Service (FWS) has not conducted its required five-year review or any other study that substantiates the need for a reclassification from "endangered" to "threatened." Manatees were originally included on the federal endangered species list in 1967 due to dire threats from pollution, loss of habitat and speeding boats. All of these threats have grown since that time. FWS must maintain the manatee's endangered status to ensure the best protections moving forward.

One of the criteria for listing a species as endangered is "the present or threatened destruction, modification, or curtailment of its habitat or range." Critical water issues, such as pollution from storm water runoff that leads to the formation of harmful algal blooms such as "brown tides" and "red tides," plague Florida waterways. Such threats contributed significantly to massive seagrass losses and the record deaths of 830 manatees in 2013. Red tide alone killed 276 manatees in 2013 while an unknown toxin related to ecosystem collapse in the Indian River Lagoon killed over 110 manatees.

The Florida Manatee's endangered status has allowed the species to advance on the road to recovery, but the threats to its habitat are still too great to warrant a change to its listing status at this time without dire consequences.

Sincerely,

Bill Nelson

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