



Save the Manatee® Club

The Voice for Manatees Since 1981

Downlisting the West Indian Manatee from endangered to threatened is premature since risks and threats throughout the species' range are not adequately controlled.

- **The US Fish and Wildlife Service's downlisting proposal does not demonstrate that threats to manatees have been controlled or reduced.** In Florida for example, loss of artificial and natural warm water winter habitat, increased vessel use, and ongoing water quality problems remain as significant threats.
- **The downlisting proposal could not be based on the recovery criteria in the species' federal recovery plan, because those criteria have been deemed inappropriate.** Though the Service has acknowledged that the current recovery plan is out of date and these criteria are unusable, it has made no effort to correct either of these glaring issues prior to proceeding with downlisting. The Service must update the Recovery Plan and set legitimate criteria *prior* to any change of status. Additionally, a finalized warm water action plan is needed, detailing how manatees will be transitioned away from artificial warm water sites to natural sites, how sufficient natural warm water habitat will be secured, and how the plan will be funded.
- **The Service's decision relies heavily on increases in the manatee population.** However, human threats to manatees and habitat, not low population counts, were the reason for the manatee's Endangered Species listing. The species still faces these threats today and mitigating these factors is the standard for recovery.
- The US Fish and Wildlife Service has erroneously determined that manatees are *not* in danger of extinction in all or a significant portion of their range, and so do not meet the definition of "endangered" under the ESA, despite the fact that **manatee populations are declining or unknown in 84% of their range and face ongoing and increasing threats to their survival.**
- **The West Indian Manatee is still at risk from 1 or more of the ESA's 5 factors used to determine listing status.** Per the statute, these factors must be controlled or mitigated *prior* to downlisting, which the Service has failed to do.
 - The species is still under threat from **present or threatened destruction, modification, or curtailment of its habitat or range.** In Florida this is due to **flow reductions in natural springs; anticipated loss of artificial warm water sites on which 60-70% of Florida's manatees depend; and loss of forage** in key habitat locations like the Indian River Lagoon where nutrient pollution has fueled algal blooms for several years. In other parts of its range, the West Indian manatee faces habitat loss, threats from watercraft strikes, and poaching.
 - **Current existing regulatory mechanisms are inadequate.** In Florida, **springs have seen reduced flow and suffer from nutrient pollution;** nutrient pollution in coastal waters has fueled nearly annual **red tide blooms** on Florida's southwest coast and **other detrimental blooms on the east coast.** Achieving the level of regulation and enforcement needed to protect habitat becomes less likely if the manatees' status changes from endangered to threatened. In other countries, laws fail to protect manatees from oil and gas exploration, development, watercraft, and poaching.
 - Manatees also face **other natural or manmade factors affecting their continued existence** including in Florida, **record numbers of watercraft-related manatee deaths in 2016.**
- **Save the Manatee Club's mission is to protect manatees and their habitat for future generations.** SMC has worked tirelessly since its inception toward a day when manatees may be justifiably downlisted and delisted, when the best available science shows that threats to manatees are controlled. SMC has consistently sought to partner with the Service to implement recovery strategies that have yet to be implemented. If, instead of spending the last two years responding to Save Crystal River and the Pacific Legal Foundation's lawsuit, the Service had instead been able to spend those resources on recovery, manatees would be much closer to true recovery today. Instead, years have been wasted on this premature downlisting effort initiated by anti-regulation special interests.