



2507 Callaway Rd.
Suite 103
Tallahassee, FL 32301
Phone (850) 224-7546
Fax (850) 224-6056

April 3, 2007

David Cook, FWC Team Leader
Panama City Crayfish Management Plan
Florida Fish and Wildlife Conservation Commission
620 S. Meridian Street
Mail Station 2A
Tallahassee, Florida 32399-1600
Via email to <david.cook@myfwc.com>

Dear Mr. Cook:

Audubon of Florida (Audubon) has reviewed the draft management plan for the Panama City Crayfish (*Procambarus econfinae*) that has been developed in support of the decision of the Florida Fish and Wildlife Conservation Commission (FWC) to reclassify this species from a Species of Special Concern to Threatened in accordance with FWC rules and procedures. The following comments are submitted for your consideration on behalf of Audubon's more than 32,000 members in Florida. This species lacked meaningful protections during the years that it was classified as a Species of Special Concern. ***We are pleased to see this action being taken and are optimistic that the objectives and strategies provided in this plan will help meet the established goals for the species. Because Florida is taking these actions today, we are more likely to avoid the future necessity of federal listing and the concomitant restrictions that would come with that designation.***

GENERAL COMMENTS. Audubon appreciates the time and effort expended by the FFWCC in developing this management plan for the Panama City Crayfish (PCC). The process included an opportunity for all of the stakeholders to participate in the development of the plan, and have their concerns addressed in the plan. The goal of the plan to delist this species after the successful completion of the objectives over the next five years is commendable and ambitious. We agree with this goal.

The plan relies heavily on Best Management Practices (BMPs) in an attempt to accommodate the needs of some of the stakeholders. A recreational harvest is authorized by a free permit to anyone wishing to request such permit. There does not appear to be a daily limit or possession limit associated with the permit, and this may result in an undetermined take of the species. Although the take is considered to be minor at this time, it remains a take without mitigation. Therefore, we recommend that data pertaining to the number of specimens of this species that are observed by enforcement officers during permit examinations in the field be accumulated in a database to track the observed recreational harvest of the species.

We do not object to the use of BMPs as one approach to the recovery of the species, but we recommend that those BMPs for roadside ditch maintenance be monitored closely. According to the information available to us, the BMPs for power lines and silviculture have adequately protected the populations of the species in these areas, and can be expected to continue to do so in the future.

SPECIFIC COMMENTS.

Page 1, Taxonomy, paragraph 2. The swimmerets of immature and non-reproductive (Form II) males are distinct from the swimmerets of females and can be used to easily determine a male from a female crayfish. Once demonstrated to a person, males (either Form I or Form II) are easily distinguished from females even in juvenile stages.

Page 2, Life History and Habitat, paragraph 1, last sentence. The secondary soils may support the PCC for extended periods of time during normal seasonal amounts of precipitation in acceptable habitats in these soil types. It does appear that the extended periods of drought can reduce the populations or extirpate them from certain areas of secondary soils.

Page 10, #8. Other Compounding Factors. It is true that identification of crayfish to the species level can be difficult for the uninitiated if one is examining all the species of crayfish from all habitats in a given area. However, it is our understanding that within the range of the PCC and the habitat it occupies, one is faced with the differentiation of primarily only three species that are easily differentiated based on the shape of the body, the chelipeds, and color pattern particularly of the spots on the cephalothorax. This could be mentioned here to relieve the concern regarding differentiation of the species that one would encounter in the habitat occupied by the PCC within its range.

Pages 11-15. Goal, Objectives, and Strategies. We agree with the goal, objectives, and strategies. General plans specific to each strategy are provided in summary form on Pages 19-21. Will these plans be provided in more detail following the presumed adoption of the plan and reclassification of the species? We recommend that sufficient detailed plans of action be rapidly developed and implemented for each strategy following acceptance of the plan and reclassification of the species. For example, the implementation of a translocation program will require a plan to assess the efficacy of the program and a monitoring program will be required to assure persistence of the translocated populations. The same statement applies to all of the strategies.

There are conservation easements held by the Florida Department of Environmental Protection scattered throughout the urban portion of the existing range of the PCC. The conservation easements were placed on wetlands that were used as mitigation for permits to alter wetlands. Some of these easements are near or adjacent to existing PCC sites and could serve as areas for enhancement and restoration of PCC habitat and minimize or eliminate the need to encumber additional properties. Migration of PCC into the enhanced or restored easements may occur. If this does not occur, the easements could be used as translocation sites.


Pages 16 and 17. Best Management Practices. We agree that BMPs will avoid the requirement of an Incidental Take Permit, and we realize that there will be an undetermined take of the species as a result. We have no objection to this point of view provided that there is a plan to oversee the results of the BMPs, particularly in the urban ditches.

The BMPs for Power and Transmission Line Construction and Maintenance and Silviculture have proven to be effective in maintaining the populations of this species over extended periods of time, and are expected to remain effective methods for maintaining the species.

Page 21, Implementation. It is stated that implementation of the monitoring plan is contingent upon available funds and personnel. If funds and personnel are not available to implement the entire set of strategies to achieve the various objectives, we recommend that the objectives and strategies be prioritized for implementation. However, phasing of the commencement of objectives and strategies will lengthen the time to the delisting of the species. We agree that the hiring of a temporary employee to implement the entire plan with the assistance of other FWC staff would be the most effective approach to achieve the goal of delisting of the species within a reasonable amount of time.

Audubon of Florida appreciates the opportunity to review the plan and provide comments. If you have questions or require clarification of our comments, please contact Julie Wraithmell, Wildlife Policy Coordinator at (850) 224-7546.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Eric Draper', written in a cursive style.

Eric Draper
Audubon of Florida Deputy Director, Policy