



United States Department of the Interior

U. S. FISH AND WILDLIFE SERVICE

7915 BAYMEADOWS WAY, SUITE 200
JACKSONVILLE, FLORIDA 32256-7517

IN REPLY REFER TO:

May 24, 2010

Mr. Kipp Frohlich, Section Leader
Imperiled Species Management Section
Florida Fish and Wildlife Conservation Commission
620 South Meridian Street
Tallahassee, Florida 32399-1600

Dear Mr. Frohlich:

Thank you for your interest in soliciting input from our agency regarding potential new state manatee protection zones in Flagler County. As you know, such zones have been among the topics discussed with the state and other stakeholders for some time as one way to address the adverse impacts to manatees by existing and future watercraft operating from facilities within the county. We welcome the current effort to formally evaluate the need for additional protection zones there, and appreciate the opportunity to contribute in an advisory capacity to this undertaking.

My staff has reviewed the information you provided us, as well as data and other information from additional sources, and provide the following comments for your consideration.

Manatees occur throughout all coastal waters in Flagler County. Those waters include the Intracoastal Waterway (ICW) as well as natural and man-made water bodies connected to the ICW. Manatee presence also appears to be seasonal, with highest numbers observed from May through August, significantly lower numbers in March, April, September, and October, and few to no animals present from November through February. *This pattern of occurrence, combined with the results from the recent boating activity study and the manatee mortality dataset, suggests that a reasonable approach to effective and efficient manatee protection throughout the county would be seasonal speed zones that reflect these patterns and the other data.*

The northernmost section of coastal waters within Flagler County includes the ICW and other water bodies between north Palm Coast and the Flagler/St. Johns County boundary. The combined lack of watercraft-related manatee mortalities, limited development potential along shorelines and within contiguous uplands, and the

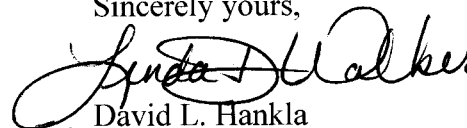
water width associated with the Pellicer Creek drainage suggest that *the benefit from establishing speed zones within this section would be small relative to other sections of county coastal waters. The same in our view applies to the Palm Coast community and its associated residential and main access canals west of the ICW.* Watercraft-related manatee mortality within this area is low and not recent, additional developable lands adjacent to the ICW is limited, and the boating activity study suggested a high degree of compliance with the existing county ordinance that mandates idle/slow speeds within those residential and access canals.

Due to its narrowness and long distance from inlets, *the section of ICW and its associated water bodies from north Palm Coast south to the State Road 100 (Moody Boulevard) bridge* represents a special challenge to protecting manatees from fast-moving watercraft. The existing information, coupled with significant development potential for watercraft access facilities, indicate that *some form(s) of protective speed zones is(are) warranted within this section. Channel-exempt zones within narrow areas offer very limited protection, and require extensive signage that would add to the large number of in-water structures already present within the waterway. One or more idle and/or slow speed zones covering the ICW shore to shore and placed in locations representing high boater/manatee overlap may offer a more reasonable and effective scheme. Coupling this with similar zoning within all water bodies contiguous to the ICW may offer the best combination of protections.*

The high number (10) of watercraft-related manatee mortalities recorded from the *southernmost section* of coastal county waters, together with the large expanse of potentially developable shoreline and contiguous uplands, suggest that this section *merits strong consideration for the maximum degree of protective zone coverage. It would in our view be reasonable to contemplate designating all of the ICW and contiguous and connected water bodies as "slow speed, minimum wake." That zone would extend from the SR 100 (Moody Boulevard) bridge south to the northern end of the existing state manatee protection zone that ends about 0.3 mile north of the Flagler/Volusia County line. We estimate the total distance of this zone at a maximum 3.75 miles.*

We hope that the preceding comments prove useful as both the state and Flagler County move forward with the formal process of evaluating the need for additional manatee protection speed zones. We look forward to further communication and coordination with you on this issue. If you have any questions regarding this response, please do not hesitate to contact Mr. John Milio at the address on the letterhead, by e-mail (john_milio@fws.gov), or by phone at (904)-731-3098.

Sincerely yours,


David L. Hankla
Field Supervisor