



Key Deer Protection Alliance
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July 25, 2022

Public Commenting Process
FWS-R4-ES-2022-0089

Re: Renewal of Incidental Take Permit for Florida Key Deer

To Whom It May Concern:

Key Deer Protection Alliance (KDPA) supports the proposed three-year extension of the Incidental Take Permit for the Florida Key deer, Lower Keys marsh rabbit and the eastern indigo snake—#TE083411-0.

KDPA actively participated in the development of the Habitat Conservation Plan for Florida Key Deer and Other Protected Species on Big Pine Key (HCP). We also participated in the 2010 Monroe County Comprehensive Land Use Plan and adoption process and are familiar with the Rate of Growth Ordinance (ROGO).

The HCP model's scientific findings demonstrated the Key deer would be at risk of extinction with any further development on Big Pine Key and No Name Key. The ITP has helped to minimize the harm to the Key deer from the fragmentation, loss and degradation of their remaining habitat.

Because of the HCP's scientific basis and the fact that the ITP is a federal permit, with the support of the local government and the state government, it has become the cornerstone of the regulatory protections for the endangered Key deer over the last sixteen years.

Two calamities have negatively impacted the Key deer and its habitat over the past six years. A New World Screwworm epidemic was confirmed in the Key deer population in 2016, and category 4 Hurricane Irma made landfall on the Lower Keys in 2017. These two incidents combined caused approximately 300 Key deer deaths and devastated the Key deer habitat.

Development pressures have increased substantially on Big Pine Key and throughout the Florida Keys since Hurricane Irma. There is an absolute need to continue development constraints in Key deer habitat beyond 2026.

KDPA strongly recommends the creation and adoption of a new Habitat Conservation Plan, based on best current science, for the twenty years beyond 2026.

Thank you for this opportunity to comment on this important issue.