



Key Deer Protection Alliance  
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Florida Ecological Services Field Office  
1339 20th Street  
Vero Beach, FL 32960  
[keydeer\\_draft\\_recoveryplan@fws.gov](mailto:keydeer_draft_recoveryplan@fws.gov)  
TRANSMITTED VIA E-MAIL

Re: Draft Recovery Plan Revisions Comments for Key Deer

To Whom It May Concern:

The Key Deer Protection Alliance believes the Florida Key deer must remain classified as an Endangered Species. The population is significantly down from only six years ago, and threats continue to exist from severely limited availability of freshwater and food resources, stochastic events, sea level rise, and death by road kills.

Summary of Recent History:

In the 1999 South Florida Multi-Species Recovery Plan, the recovery criteria for down-listing the Key deer states: "The Key deer has a narrow geographic range and low reproductive performance causing it to be susceptible to extinction. Recent information indicates the Key deer has experienced local extirpations and a contraction in range due to the loss, fragmentation, and degradation of its habitat and other anthropogenic factors. Consequently, the objective of this recovery plan is to reclassify the Key deer from endangered to threatened by protecting, managing, and restoring its habitat in the Lower Keys."

Between 1999 and 2013, the Key Deer Protection Alliance witnessed and reported a drastic decrease in the historic Key deer management activities, including the lack of monitoring diseases and the herd's health through regular necropsies and the management of freshwater and food resources beyond controlled burns and mechanical treatment.

In 2016, the New World Screwworm was confirmed in the Key deer population, resulting in 135 known mortalities. In 2017, Big Pine Key and No Name Key experienced Category 4 hurricane force winds for 60 hours. Between the winds and storm surge, not only was the environment nearly destroyed, there were over 151 known Key deer

mortalities. Damage to the habitat is still apparent in 2022, particularly in the loss of availability of freshwater resources due to saltwater intrusion from Hurricane Irma.

In 2018, the Key Deer Protection Alliance, along with one local and three national organizations, wrote the USFWS (Larry Williams) outlining the fact that none of the six criteria for the reclassification of the Key deer from Endangered to Threatened had been met.

Nothing has changed since 1999 that has improved the status of the Key deer. In fact, the Key deer are more threatened in 2022 due to the conditions stated above.

We recognize that the numerous formal comments offered regarding the 5-year Species Assessment Review have been considered when creating the set of down-listing criteria. For this we are grateful. Nonetheless, the proposed criteria for de-listing seems less comprehensive than the 1999 criteria for down-listing, which does not make sense. Also, neither list delineates some of the basic needs of the system to enable adequate protection of the Key deer.

What really needs to be done to protect the Key deer from extinction would be to strive to achieve the criteria listed in the 1999 Recovery Plan and the criteria listed in the 2022 draft amendment to the Recovery Plan by securing additional staff at the National Key Deer Refuge to ensure a more comprehensive approach to management.

Funding and staffing of the National Key Deer Refuge is at an all-time low. There has not been a biologist with Key deer expertise since 2000, and the last full-time biologist, whose specialty was herpetology, left the Refuge in 2018. We are told a new biologist has been hired, but without support staff and adequate funding that action will not resolve the lack of comprehensive management of the Key deer.

In 2015, the responsibility for reporting Key deer injuries and mortalities was turned over to the Florida Fish and Wildlife Conservation Commission (FWC). FWC Officers were instructed by USFWS to move dead Key deer to the side of the road. Response time for injured Key deer has been poor. FWC reports the mortality data to USFWS, which keeps track of the numbers. Often the system does not work. As such, there is no reliable data on Key deer mortalities.

We request that the wording of the proposed criteria for de-listing the Key deer be amended to include the following management activities.

1. Hire a full-time biologist with knowledge of the Key deer.
2. Apply for grant and additional sources of funding for management activities.
3. Account for Key deer mortalities by FWS taking this responsibility from FWC.
4. Monitor the herd's health through regular necropsies, etc.
5. Restore damaged habitat, especially the cleaning out of natural solution holes through the entire range to enhance the availability of freshwater resources.
6. Enforce existing regulations (illegal feeding of Key deer, free-roaming dogs, etc.).
7. Encourage speed limit enforcement by Monroe County.

Thank you for the opportunity to input these comments to the draft revisions to the Key Deer Recovery Plan and to share our experiences over the years, which illustrate the diminished status of the species since 1999 and the critical need for the Key deer to remain classified as an endangered species.

Sincerely,

Key Deer Protection Alliance