



December 1, 2006

Chairman Rodney Barreto  
Commissioner H.A. "Herky" Huffman  
Commissioner Richard A. Corbett  
Commissioner Kathy Barco

Vice Chairman David K. Meehan  
Commissioner Sandra T. Kaupe  
Commissioner Brian S. Yablonski

Florida Fish and Wildlife Conservation Commission  
620 S. Meridian St.  
Tallahassee, FL 32399-1600  
*Via email to commissioners@myfwc.com*

Re: Proposals Relating to Alligators at the December 6<sup>th</sup> Commission Meeting

Dear Commissioners:

Alligators play a crucial keystone role in our wetland communities and, accordingly, Audubon of Florida is interested in the ecological integrity of their populations. We have some concerns regarding the proposals placed before you at your December 6<sup>th</sup> meeting in Key Largo, and ask you not to approve several of them.

These proposals have been drafted based on public input and, while it is good that the FWC is soliciting and considering stakeholder input on its decisions, 65% of the respondents self-identified as "general public." It is important that the agency's biological and law enforcement staff play a leadership role in vetting these recommendations. Some of these proposals appear to require greater clarification and staff analysis than has been presented, yet you are being asked to sanction all for further investigation with an eye towards eventual approval.

In particular, we are concerned about the following proposals and feel they require greater evaluation if they are ever to deserve your approval:

**Near-Term Proposal #1: Establishment of a bag and/or date limited general statewide alligator harvest season, exclusive of intensively monitored Alligator Management Units.**

By opening a general hunt, the FWC would have no ability to control where hunters go, with the possibility of a few lakes with easy access and large gators bearing the brunt of the statewide harvest. This could have undesirable effects on the balance of alligator populations statewide, when it is in the best interest of both the resource and hunting experience that the age classes and distribution of alligator populations are maintained. FWC's current system works well for hunters as well as for alligator populations.

**Near-Term Proposal #4: Elimination of size and quota restrictions on private lands and non-FWC managed lands, essentially allowing a landowner or public lands manager the flexibility to implement alligator management programs ranging from population reduction to sustainable use strategies.**

Without greater clarification, this proposal would allow the extirpation of alligators on some private properties, possibly depleting populations across very large areas. Alligators are a crucial part of functioning Florida wetlands, providing refugia (gator holes) for wetland species during periods of drought and protecting wading bird colonies from native predators like raccoons and snakes as well as new exotic threats such as Nile monitors, iguanas and the Argentine tegu. Similarly, healthy wetlands on private property are just as important as on publicly owned lands. While we do not oppose the issuance of take permits for nuisance gators, we feel that alligator harvest on private property should be guided by the same goals of healthy, sustainable populations that currently help set harvest limits on public lands.

**Near-Term Proposal #5: Development of self-help procedures for homeowners to handle nuisance alligator issues themselves**

Allowing homeowners to handle nuisance alligator issues themselves could be a grave public safety concern, would likely result in undue persecution of alligators and could have significant implications for endangered American Crocodiles (a confusion species) in South Florida. Of all of these proposals, this is the one that causes the greatest concern, and we are surprised staff feels it is necessary to spend time and money further pursuing this option. Beyond the public safety concerns, proper management is essential to maintain this species; accordingly, alligators should only be killed after a nuisance permit is issued, or with a legal harvest permit. This proposal would also compete with nuisance trappers, endangering the function of that program; if the program became sufficiently impaired, it could significantly endanger citizens who lack experience to safely deal with alligators on their own.

**Long-term Proposal #1: Reviewing appropriateness of including alligators on the state protected species list (currently a Species of Special Concern) and whether to reclassify it as a “game” species.**

We have historically persecuted large predators unduly—panthers, wolves, alligators, sharks—and protections of these species are in many cases the only thing stemming the return of rampant persecution. In addition, endangered American crocodiles may be easily confused with American alligators by the general public, and for their protection, it is best if the alligator’s current protections remain in place. Alligators play a crucial role in our wetland communities and deserve the protection they currently enjoy as a species of special concern. The alligator’s current listed status precludes neither the current, permitted commercial and recreational harvest of alligators, nor the permitted removal of nuisance alligators.

**Long-term Proposal #3: Investigating the efficacy of completely privatizing the statewide nuisance alligator program.**

The nuisance alligator program is already significantly privatized—the state simply fields the calls, determines whether the alligator poses a threat and issues the order for removal. The state will ultimately be held accountable for the judgment calls made by

this program and its reliability, something that could not be guaranteed by a private vendor. Similarly, current FWC oversight ensures that the public trust rather than financial gain is the primary motivation in the removal of nuisance alligators. This could not be guaranteed were the program entirely privatized.

**Long-term Proposal #4: Developing strategies to engage communities to a greater extent in addressing local alligator management issues.**

This proposal falls short of addressing one of the most resounding requests from the public survey: a call for increased education on living with alligators. The fact that this popular comment was overlooked in this set of proposals is dismaying, when many other less universal proposals appear to have been included. Many of the issues we are facing with alligators could be mitigated with increased and improved public outreach, combating sensational misconceptions about alligators and educating residents about the importance of alligators and how to co-exist with them.

The proposal presentation posted on the Alligator Management site<sup>1</sup> suggests your approval will be a positive endorsement of these proposals. Without greater detail on some of them, they could usher in a shift in alligator management, which would maintain alligator populations in certain core, publicly owned areas and essentially sacrifice alligator populations outside of those areas. Florida's wetlands are functioning biological communities in which alligators play an important role. We know FWC staff recognize this role, but do not think this biological view has been well reflected in this process to-date. Although Audubon applauds agency actions that include significant public input, public input does not necessarily equate with technically sound wildlife management plans. The FWC has a highly trained professional staff that should independently and thoroughly review the proposals and provide comments to the Commission. A comprehensive biological assessment should be a significant determining factor in ultimately setting statewide policy for alligator management.

Until staff demonstrates that these proposals are desirable for the long-term health of Florida's alligator populations, we urge you not to sanction efforts to implement them.

Sincerely,

A handwritten signature in black ink, appearing to read 'DAVID ANDERSON', with a long horizontal flourish extending to the right.

David Anderson  
Executive Director

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<sup>1</sup> [http://www.floridaconservation.org/gators/Dec\\_2006\\_\(Alligator\).pdf](http://www.floridaconservation.org/gators/Dec_2006_(Alligator).pdf)