

Wildlands Network  
1402 3rd Avenue  
Suite 1019  
Seattle, WA 98101  
www.wildlandsnetwork.org

Aug. 29, 2017

US Fish and Wildlife Service  
Florida Panther Recovery Team  
12085 State Road 29 South  
Immokalee, FL 34142

RE: Comments on 5-year status review of Florida Panther

Dear US Fish and Wildlife Service,

The Florida panther's recent population growth in south Florida is encouraging, and almost certainly speaks to the genetic rescue effect generated by introduction of cougars from Texas. However, urban development continues to quickly erode prime Florida panther habitat across Florida and in other southeastern states as well. This unmitigated pattern of urban development across the region is one of several signals that the current efforts to recover the panther are inadequate for achieving the goal of recovering the Florida panther to the point where it is no longer threatened with extinction in the wild.

The fact that only one female panther has been found north of the Caloosahatchee River since 1973 speaks to the incredibly slow northward recovery rate even with the recent population increase. Panthers will not win the race with development in central Florida, nor will they win the race with accelerating sea level rise that will impact much of their current range in extreme south Florida, unless the scope of Florida panther conservation efforts are greatly increased.

Therefore, we are writing to request you consider the following recommendations for improving the recovery planning process for Florida panthers in Florida and other southeastern states:

1. The most straightforward task for FWS, to fulfill your obligations to protect the Florida panther from extinction, is to quickly proceed with designating critical habitat for Florida panthers across Florida and into other southeastern states. Your agency rejected a reasonable petition to designate critical habitat earlier this decade, and in the years since then considerable amounts of Florida panther habitat have been lost as a result.

FWS should identify a set of core panther habitat areas and corresponding interconnecting corridors that would be sufficient to meet the recovery goals for the

subspecies (at a minimum, 3 populations of 240 animals each, which really is an underestimate of the population size required to truly make the panther safe from extinction, see below). The core areas and corridors should all then be declared critical habitat for the subspecies. In Florida, these critical habitat areas should follow the Florida Ecological Greenways Network plan that has been continuously improved for decades (and which targets numerous species besides Florida panther).

Outside of Florida, additional corridor models are available, such as the Eastern Wildway Network map and Florida panther habitat connectivity models recently produced by Wildlands Network.

We would be happy to assist with the development of additional guidance for where to designate critical habitat for Florida panther in the southeast region. As we recently noted in our comments on the red wolf scoping document, it would make sense to combine critical habitat designation for Florida panther and red wolf into a single multi-species delineation across the southeast region.

We note that critical habitat designation is not limited to the current range of an endangered species. Your own FAQ page regarding Critical Habitat has the following quote: "Critical habitat may also include areas that are not currently occupied by the species but will be needed for its recovery."

<https://www.fws.gov/endangered/what-we-do/critical-habitats-faq.html>

In the case of the Florida panther, the area needed for recovery outside of the subspecies' current range in south Florida is quite large, and should not continue to be ignored. Continuing to treat the Florida panther as primarily an issue for south Florida conservation politics is counterproductive to the actual recovery of the subspecies across its former range.

2. Designating critical habitat does not adequately prevent development on private lands, but it does force much better coordination between government agencies, including those involved in the construction of roadways. FWS should press federal and state Department of Transportation's to consider wildlife road crossing installations as *mandatory* components of any significant road expansion or repair projects anywhere within the defined critical habitat network for the species. Wildlife road crossings (with panther-proof fences leading to the crossing sites) are urgently needed across the former range of the subspecies, not just in South Florida where the ~200 panthers currently live.

There is no valid biological reason to restrict wildlife road crossing implementation to only the current restricted range of the subspecies, when recovery of the subspecies to a much broader area is the official recovery goal. Since many highway construction and upgrade projects will not be repeated for several decades once they are finished, FWS cannot afford to wait for panthers to reach potential new areas before engaging with transportation agencies. Road projects need to be mitigated now, anywhere across the potential recovery range of the subspecies

where the roads in question would pose significant barriers to Florida panther expansion and viability.

3. The other needed task for FWS is to quickly proceed with reintroducing Florida panthers into several of the large core areas of habitat in northern Florida and southern Georgia, ideally within the next 5 years. The list of reintroduction sites should include: Eglin Air Force Base, Apalachicola National Forest (and Tate's Hell State Forest), and Okefenokee NWR/Osceola National Forest. Combined, these areas should be able to support an additional population of 200 or more panthers, and would also allow for dispersal of panthers in many directions that are currently unavailable to the cats that are for the most part stuck in south Florida. Significant Land and Water Conservation Fund dollars should be spent protecting the key corridors that connect the core areas listed above, to keep them intact for long enough that the panther has a chance to reestablish itself before development destroys the possibility. Time is of the essence, and FWS cannot afford to wait several more decades for urbanization to completely erode the chances of recovering Florida panthers in the southeast.

4. The reintroduction to north Florida should be preceded (and accompanied) by strong landowner outreach efforts. FWS should employ several staff in north Florida whose sole job is to communicate with the public (and with rural landowners in particular) about coexistence methods for successfully living with panther/mountain lions. Landowner incentive funds should be developed for key private properties whose size and location are integral to the viability of this population. Free or low-cost extension services should also be broadly offered to provide training to landowners to deal with arriving panthers in non-lethal ways.

5. FWS should also identify a third site for Florida panther recovery, most likely the federal lands complex of the southern Appalachians. This area would include Great Smoky Mountains National Park, and also all of the surrounding national forests (Pisgah, Nantahala, Cherokee, and Chattahoochee). The combined landmass in these federal holdings should be sufficient to host a population of several hundred Florida panthers. Reintroduction efforts should proceed in this third location as soon as the panthers are well-established in north Florida, or could even be attempted simultaneously to encourage immediate gene flow of dispersing animals between the two new panther populations.

6. As we noted in our more extensive comments on the red wolf scoping documents, the population estimates that have been included in 1980's and 90's era ESA recovery plans are inadequate for actually achieving viable populations of vertebrate animals. More recent estimates indicate that vertebrate population sizes in the thousands are needed for true population viability and genetic health (Reed et al. 2003, Traill et al. 2007). We think an appropriate target for delisting the Florida panther subspecies from endangered to threatened status would be a wild population size of 2,000 animals. To delist the panther altogether, the population

size should reach at least 5,000, and the species should still be actively monitored to be sure it does not fall below that threshold again.

For comparison purposes, the state of California is believed to host approximately 5,000 mountain lions, and we do not think it is unreasonable to suggest that the wet, deer-rich southeast region of the US could sustainably host a similarly-sized population of Florida panthers. California (104 million acres) is roughly the same size as Florida, Georgia, and Alabama combined (113 million acres). California's human population (39 million) exceeds the combined human population of Florida, Georgia, and Alabama (35 million). Adding in the other southeastern states provides ample room for a fully recovered Florida panther population, if habitat conditions can be stabilized, corridors restored, and major road crossings provided.

7. Population viability is not the only science-based standard by which to judge recovery goals. Top carnivores such as Florida panther play extremely important roles in natural ecosystems (Terborgh et al. 2001, Estes et al. 2011, Ripple et al. 2014) and therefore the FWS should, as part of an integrated multi-species/multi-habitat conservation plan, consider revising the recovery goals for the Florida panther to make sure that the recovered population size is sufficient to maintain ecological function across the remaining natural areas of the southeast landscape. At a minimum, the FWS should seek to reestablish Florida panthers at all major public lands complexes around the region. Doing so would help mitigate the impacts of overabundant deer populations on numerous species of native plants, and would also likely reduce the impacts of overabundant mesopredator mammals (possums, raccoons) on numerous species of native songbirds. Put another way, even if the ESA does not mandate recovery of endangered species to meet population densities needed for restoring ecological function, top carnivores like Florida panther and red wolves are so essential to ecosystem health that their recovery should be seen as part of the recovery goals for numerous other endangered and candidate-endangered plant and animal species.

Thank you very much for putting the biological interests of recovering the Florida panther above the short-term, and in many cases, misguided political considerations your agency continues to be buffeted with in the current era. The time has certainly come for the Florida panther to move or be moved outside of just south Florida.

Sincerely,

Ron Sutherland, Ph.D. (Corresponding Author)  
Conservation Scientist  
Wildlands Network  
ron@wildlandsnetwork.org  
919-641-0060



## References

Estes, J.A., J. Terborgh, and 22 others, 2011. Trophic downgrading of Planet Earth. *Science* 333:301-306.

Reed, D.H., J.J. O'Grady, B.W. Brook, J. D. Ballou, and R. Frankham, 2003. Estimates of minimum viable population sizes for vertebrates and factors influencing those estimates. *Biological Conservation* 113: 23-34.

Ripple, W., and 12 others, 2014. Status and Ecological Effects of the World's Largest Carnivores. *Science* 343:1241-1244. DOI: 10.1126/science.1241484.

Terborgh, J. and 10 others, 2001. Ecological meltdown in predator-free forest fragments. *Science* 294:1923-1926.

Traill, L.W., C.J. Bradshaw, and B.W. Brook. 2007. Minimum viable population size: A meta-analysis of 30 years of published estimates. *Biological Conservation* 139:159-166.