

November 27, 2006

Sandy MacPherson
Jacksonville Field Office
U.S. Fish and Wildlife Service
6620 Southpoint Drive South, Suite 310
Jacksonville, Florida 32216
Via FAX to (904) 232-2404

Re: Comments on the Five-year Review of the Wood Stork (*Mycteria americana*)

Dear Ms. MacPherson:

Audubon of Florida requests that the U.S. Fish and Wildlife Service (Service) consider the following comments in its five-year status review of the Wood Stork (*Mycteria americana*).

Audubon staff members have monitored Wood Storks nesting at Corkscrew Swamp Sanctuary each year since 1958. Over the past few decades, this nesting colony has been the largest active colony in terms of both number of nest starts and number of fledged storks in all but a few years. These well documented contributions to the larger population of storks establish this colony location and the surrounding foraging area as vital to the long-term recovery of this species.

Nationwide tracking of nesting success over the past seventeen years shows an increasing trend in the U.S. population of Wood Storks. We recognize this as encouraging but insufficient apart from solid scientifically based assurances that such increases are sustainable. A population increase alone is insufficient grounds for declaring success in Wood Stork recovery efforts.

*The Revised Recovery Plan for the U.S. Breeding Population of the Wood Stork*¹ states in Part II.A that criteria for reclassification of the Wood Stork from endangered to threatened would involve achieving a population increase to “6,000 breeding pairs provided that the increase was sufficiently well understood so that the population level could be maintained or increased.”

Audubon staff analysis of hydrologic and nesting data was recently included in a report to the Service² demonstrating the correlation between nesting success and water levels at

¹ USFWS. 1997.

² Lauritsen, J. 2006. *Wood Stork Foraging Assessment (Pilot Study); and an Analysis of the Historic Data from Corkscrew's Stork Colony in Light of Hydrologic Conditions*. September 2006.

Corkscrew and documenting the trend in increasing rainfall and water levels for over thirty years. The last six years at Corkscrew have received the most wet-season rainfall, experienced the longest hydroperiods and seen the deepest local water levels for any such period on record. Data indicate that this is a significant factor in creating the conditions for a Wood Stork population boom in South Florida.

Reasons given for the population decline in the scientific literature and echoed in the existing recovery plan revolve around habitat loss and degradation, namely in the form of the large-scale conversion of wetlands to other land uses. Although the rate of wetland conversion has abated, acreage losses of wetlands still occur in significant numbers in Southwest Florida. Especially at risk are ephemeral or short hydroperiod wetlands with poor local, State and Federal protections. The Comprehensive Everglades Restoration Plan (CERP) has been in the planning phase for years, and some projects have begun implementation, but none of these CERP efforts have contributed in any significant way to the Wood Stork population trends. Therefore we can discount CERP as the motivation behind stork increases.

We recognize the promise of restoration of the Everglades as a potential boon to Wood Storks. We hope that such restoration proceeds as scheduled and provides as good a lift for the species as predicted. However, we feel it would be irresponsible to use projected rather than realized benefits of Everglades restoration as a recovery criterion.

We understand the divestment of large land holdings by the timber industry in Georgia and the Carolinas to development interests represents a threat to newly established colonies in that area of their range. Combined with the constant threat of development in North, Central and Southwestern Florida, we believe the Wood Stork's future remains uncertain.

We believe that it would be premature to begin a downlisting process for the Wood Stork, given that the primary factor that appears responsible for the increasing population trend is meteorological rather than one that can be sustained for the benefit of the Wood Stork. Downlisting Wood Storks would erode the limited protections their foraging areas now receive and allow development and wetland conversions to proceed at an accelerated pace. These losses combined with a drying trend as rainfall amounts regress toward long term averages would most likely cause another collapse in the stork population.

Thank you for this opportunity to comment. We look forward to our staff's continued participation in your recovery team's efforts.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Anderson', written in a cursive style.

David Anderson
Executive Director