

September 10, 2007

Chairman Duncan
315 Court Street
5th Floor
Clearwater, FL 33756
Attention: Ronnie E. Duncan

RE: Audubon of Florida's Shell Key Management Plan Recommendations

Dear Chairman Duncan:

The Shell Key Preserve Management Plan is being revised in accordance with the lease agreement between Pinellas County and the State of Florida. Audubon has been involved with this undeveloped barrier island for over twenty years. Based on our scientific research and conservation work, we urge you to support the version of the Shell Key Preserve Management Plan currently proposed by county staff and endorsed by the Pinellas County Environmental Forum.

Shell Key is known by Florida biologists to be one of the most important sites in the state for nesting, migrating, and wintering shorebirds. The Florida Fish and Wildlife Conservation Commission lists Shell Key as one of the five key sites for beach-nesting seabirds in Florida. Studies by Partners in Flight and the US Fish and Wildlife Service revealed the importance of Shell Key to migrating and wintering Red Knots and Piping Plovers, both imperiled species. Audubon of Florida includes Shell Key in its list of Important Bird Areas (Lower Tampa Bay). This importance to shorebirds has lead Pinellas County to acquire private landholdings on Shell Key and to lease state-owned lands there, with the goal of improved management of the key and its adjacent mudflats, mangrove islands, and seagrass beds.

Annually, several hundred pairs of state-listed and rare species nest at Shell Key, including Least Terns and Snowy Plovers (both Threatened), American Oystercatchers and Black Skimmers (both Species of Special Concern), Wilson's Plovers and Willets (both Partners In Flight/National Audubon Society WatchList species), and even common species as Laughing Gulls (80% of Florida's Laughing Gulls nest in the Tampa Bay area).

The terms of Pinellas County's lease of this island require that the Preserve be managed "only for the conservation and protection of natural and historical resources and for resource-based public outdoor activities and education which are compatible with the conservation and protection of these public lands".

Specifically, the lease requires five specific conditions establishing minimal standards for the management plan:

1. to ensure management compatible with the protection and conservation of wintering and nesting shorebirds;
2. to delineate core areas for the protection of shorebirds within the greater Shell Key area;

3. to post critical bird habitat to prohibit trespass and minimize human disturbance to wintering, nesting, and migrating shorebirds;
4. to enforce Pinellas County laws on Shell Key;
5. to prohibit beach raking and mechanical cleaning activities during shorebird and turtle nesting season.

In addition to meeting the terms of the lease agreement, Shell Key Preserve is subject to relevant local, state, and federal laws, the policies of the Board of Trustees of the Internal Improvement Trust Fund regarding state-owned lands, and the Pinellas County Board of County Commissioners regarding county-owned or managed properties.

Pinellas County Environmental Lands staff, the Pinellas County Sheriff's Office law enforcement staff, and Shell Key Preserve volunteers are to be commended for valiant and effective efforts to manage this site during the last seven years. Still, the experience of the last seven years also reveals some serious deficits in the past Management Plan. Please find, attached, Audubon's management recommendations for Shell Key. All of these are included in the current version of the Shell Key Management Plan that has been presented to you by staff, and recommended by the Pinellas County Environmental Forum and the Shell Key Stakeholders Advisory Panel.

Thank you for consideration of these recommendations. We urge you to approve the current version of the Shell Key Management Plan as presented by your staff. Please contact Dr. Ann B. Hodgson, Gulf Coast Ecosystem Science Coordinator, (813) 623-6826, regarding any questions concerning Audubon of Florida's position on this plan.

Sincerely,

A handwritten signature in black ink, appearing to read "David Anderson", with a stylized flourish at the end.

David Anderson
Executive Director
Audubon of Florida



**AUDUBON OF FLORIDA'S
RECOMMENDATIONS FOR MANAGEMENT OF
SHELL KEY PRESERVE, PINELLAS COUNTY**

ISSUE: DOMESTIC ANIMAL DISTURBANCE OF NATIVE WILDLIFE POPULATIONS

Nesting birds are extremely vulnerable to the presence of dogs on- or off-leash, which they perceive as dangerous predators. Nesting seabirds respond to dogs by flying off nests, leaving eggs and young vulnerable to death and injury from heat stress or predation by gulls or crows. Additionally, Shell Key Preserve offers critically important migratory and wintering habitat for shorebirds, including imperiled Red Knots. Dogs that disturb roosting and foraging birds threaten the very survival of wintering and migrant shorebirds.

Shell Key's current leash laws have not sufficiently protected these sensitive resources. Environmental Preserve staff has documented over 1,000 intrusions by people and their dogs into the areas posted as "no entry" for the protection and conservation of wintering and nesting shorebirds. Law Enforcement and the public find that there is confusion about season restrictions for dogs and that leash restrictions are generally violated, as soon as the officer is out of sight. Other Pinellas County parks and preserves have a more effective "no pet" policy.

Recommendation:

- 1. Prohibit dogs on- and off-leash year-round to better protect Shell Key's sensitive resources, as well as to provide better clarity and efficiency of enforcement.**

ISSUE: HUMAN HEALTH AND SAFETY HAZARDS

Currently, alcoholic consumption is possible on Shell Key due to a "wet foot/dry foot" policy. Unfortunately, alcohol is frequently complicit to unruly behavior at Shell Key, which aggravates the occurrence of illegal activities as well as making the preserve unattractive to the families of Pinellas County. Broken bottles, glass and discarded nails and cans from campfires at this "drinking destination" pose an undue hazard to the public and a liability to the county. Additionally, partygoers rarely bring portable toilets with them; human waste poses a significant health hazard at this public swimming area. No other Pinellas County park or preserve allows the consumption of alcohol by its visitors.

Recommendations:

- 1. Make Shell Key's rules consistent with the rest of Pinellas County's parks and preserves. Prohibit consumption of alcohol, to better enable law enforcement officers to protect the resources of Shell Key Preserve and the safety of its visitors;**
- 2. Conduct regular water quality testing within the Preserve (especially to monitor fecal bacteria of human origin);**
- 3. Register campers and require the use of portable toilets.**

ISSUE: HUMAN TRASH IN THE NATURAL ENVIRONMENT

Trash left by human visitors is a safety hazard to subsequent human visitors and wildlife alike. Currently, a small but very committed squadron of volunteers and staff remove large amounts of trash from Shell Key Preserve. Their

efforts are to be congratulated, but this is an unfair burden to them and the taxpayers of Pinellas County. Shell Key Preserve visitors should stop dumping trash on Shell Key Preserve.

Recommendations:

1. **Identify effective trash removal strategies;**
2. **Study and develop a management solution concerning visitor and boater carrying capacity to Shell Key Preserve.**

ISSUE: ARTIFICIALLY ELEVATED POPULATIONS OF NEST PREDATORS

Raccoons are a natural predator of nesting birds as well as sea turtles. Naturally, Shell Key's raccoon population would be limited or eliminated by lack of shelter, freshwater, or the presence of higher predators. However, current human uses of the island have eliminated higher predators and populations of raccoons are artificially elevated due to trash availability and other human subsidy of food for this mid-level predator. Pinellas County Environmental Lands and Fort De Soto Park staff have made great strides in their efforts to control raccoons on the island and in adjacent areas, and their efforts are very much appreciated by Audubon of Florida.

Recommendation:

1. **Control raccoon populations for the benefit of imperiled native wildlife.**

ISSUE: INVASIVE EXOTIC SPECIES

Invasive non-native species such as Australian pines provide sites for raccoons to spend the day on Shell Key Preserve and inhibit native plant species from growing on Shell Key.

Recommendation:

1. **Apply an aggressive invasive exotic species management plan.**

ISSUE: PUBLIC INTEREST IN LEARNING MORE ABOUT SHELL KEY'S RESOURCES

Shell Key is a world-class resource in Pinellas County's backyard. Volunteer bird-stewards have proved to be effective during holiday weekends to help the public understand the need of nesting birds to remain undisturbed. In addition, the Applied Science Research activities that the Pinellas County Environmental Department biologists have been undertaking over the last seven years are leading to improved management strategies, as exemplified in the current Shell Key Management Plan.

Recommendation:

1. **Expand environmental education and outreach programs, signage, and literature.**

ISSUE: MANAGING SHELL KEY AS A SYSTEM RATHER THAN A DISCREET SITE

Shell Key is an integral part of a functioning ecosystem, and as such, it depends on the health of its surrounding habitats. Without sufficient management, adjacent seagrass beds are threatened by scarring from careless boat use. Additionally, Shell Key is a dynamic barrier island that erodes and accretes. Wildlife take advantage of this shifting shoreline; a management plan should ensure it is all well-managed.

Recommendations:

- 1. Identify conservation needs of off-island habitats. Design and implement conservation strategies.**
- 2. Expand Shell Key Preserve boundaries to include the accreting sand spit on the southwest corner of the barrier island and other areas as the island and other preserve habitats change in response to weather and water forces.**

For more information contact

Audubon of Florida's Gulf Coast Region
& Florida Coastal Islands Sanctuaries Program
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9/10/07