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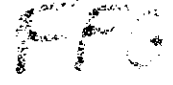
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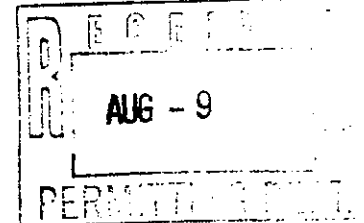


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August 3, 2001

Mr. Bryant Grant, Permitting Manager
IMC Phosphates Company
P.O. Box 2000
Mulberry, Florida 33860-1100



Dear Mr. Grant:

This is to provide you technical comments regarding the *Florida Scrub Jay Habitat Management Plan for IMC Phosphates Company Southern Hillsborough and Manatee County Projects* (Plan). I also have reviewed the U. S. Fish and Wildlife Service (Service) Biological Opinion regarding this Plan and its effect on the Florida scrub-jay (*Aphelocoma coerulescens*), bald eagle (*Haliaeetus leucocephalus*) and eastern indigo snake (*Drymarchon corais couperi*).

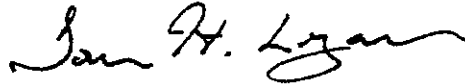
The Plan generally proposes to mine portions of 30,660 acres that currently support 14 families of scrub-jays on approximately 4,500 acres of degraded FFWCC Type I & II Scrub habitats and to sustain those families through habitat restoration and reclamation subsequent to mining activities that will occur over a 30-year period. Approximately 8,900 acres of FFWCC Type I & II Scrub habitat will be reclaimed and/or restored and under management by the end of that period, with an anticipated capacity to support up to 28 families of jays. There will be a 2.28 fold increase in FFWCC Type I Scrub habitat. Limited supplemental feeding and translocations will augment habitat management in such cases where on-site conservation actions may be limited, independent of mining and other management efforts. I have reviewed the viability model for IMC portion of the meta population, the present demography of the 14 families presently supported on IMC lands and prevailing conditions of the habitats supporting these families, and it is my opinion that the majority of these families will not survive without management intervention. Therefore, I do support the Plan as written. I also support the Service "may effect" findings, and endorse the Reasonable and Prudent Measures that are necessary to reduce take, the Terms and Conditions for incidental take and the Conservation Recommendations as presented in the Biological Opinion.

Monitoring is a key element of the Plan that will be essential for evaluating both its initial and long-term progress. Therefore, it is requested that IMC provide this office copies of survey and other relevant study reports, as they are available. It also should be noted that a state permit will be required from this agency for authorization to capture,

mark and relocate scrub-jays [68A-27.002(2)F.S.]. Such permit may only be issued for scientific or conservation purposes and only upon a showing by the applicant that the permitted activity will not have a negative impact on the survival potential of the species.

Thank you very much for the opportunity to review and provide technical comments regarding this important Plan. I look forward to being kept informed regarding its implementation.

Sincerely,



Tom H. Logan
Endangered Species Coordinator

THL/thl
ESC 6-2

IMC Scrub-jay Mgt Plan July 01

cc: Mr. Jim Feiertag
Ms. Nancy Douglass
Mr. Peter Benjamin, FWS