

**MARINE MAMMAL COMMISSION
4340 EAST-WEST HIGHWAY, ROOM 905
BETHESDA, MD 20814**

14 January 2005

Mr. Sam D. Hamilton
Regional Director, Southeast Region
U.S. Fish and Wildlife Service
1875 Century Blvd., Suite 400
Atlanta, GA 30345

Dear Mr. Hamilton:

The Marine Mammal Commission understands that the U.S. Fish and Wildlife Service is considering writing to the Florida Department of Environmental Protection to ask that captive manatees now being maintained in the headwaters of the spring run at the Homosassa Springs State Wildlife Park be moved to other facilities or isolated holding pools at the park. In 2001 some of the animals at the park were diagnosed with a previously unknown papillomavirus. The virus, which is expressed in the form of lesions and rough patches on the skin, has since been found in the wild manatee population that uses spring waters downstream from the captive animals as a warm-water refuge. The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors, has reviewed information on this situation and strongly believes that such a letter is warranted and that the captive animals should be removed from the spring run and maintained at facilities completely isolated from wild manatees.

There are several reasons for taking this action. First, there is a good possibility that sloughed skin from infected animals in the spring run may drift downstream and pose a risk of infection for wild animals. This is supported by experience with captive animals that indicates the virus is contagious, and by observations that the only wild manatees in which the virus has appeared belong to the subpopulation that frequents Homosassa Springs.

Second, we believe the spring run should be opened and made fully accessible to wild manatees for use as a warm-water refuge. As indicated in the enclosed 1 December 2000 letter to the Florida Department of Environmental Protection, the Commission has urged in the past that such steps be taken to enhance the species' recovery and continue to believe doing so would be appropriate. This also is consistent with the Florida Manatee Recovery Plan, which calls for steps for improving manatee access to natural warm-water springs.

Finally, we believe it would be in the captive manatees' best interest to move them to facilities that have warmer temperatures. We understand that the manatees maintained in the spring run are overweight and show signs of immunosuppression. Some scientists believe this may be due to their maintenance in waters that stay at about 22 C year-round. Although such temperatures are adequate to sustain animals during winter months, access to warmer temperatures in non-winter periods may be needed to maintain animals in good health. To date, winter use and survival of manatees at warm-water springs has been viewed as evidence that temperatures of 22 C are safe for

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manatees. However, both temperature and length of exposure to a given temperature are factors governing their thermal tolerance. It may be that constant exposure to 22 C is at the lower edge of their thermal tolerance and sub-optimal for their long-term maintenance.

Given these points, the Marine Mammal Commission recommends that the Service work with managers of the Homosassa Springs State Wildlife Park and other captive maintenance facilities to arrange for moving the animals now held in the spring run to existing isolation pools at Homosassa Springs or to other facilities as soon as possible. The Marine Mammal Commission also recommends that the Service and park managers make arrangements to remove the fence blocking access by wild manatees to the headwaters of Homosassa Springs. In this regard, we suggest that removal of the fence be delayed at least one year after removal of the captive animals to minimize the risk of infecting wild animals with viruses shed by the captive manatees that may be sequestered in the spring run sediments.

In summary, the Marine Mammal Commission believes that the actions we recommend may increase the health of the captive manatees, reduce the risk of spreading the disease to the wild manatees using Homosassa Springs, and provide improved access to warm-water habitat essential for manatee survival in winter. If you or your staff has questions regarding these comments and recommendations, please call.

Sincerely,



David Cottingham
Executive Director

Enclosure

cc with enclosure: Ms. Colleen Castille, Secretary
Florida Department of Environmental Protection

Mr. Kenneth D. Haddad, Executive Director
Florida Fish and Wildlife Conservation Commission