



October 23, 2006

Smalltooth Sawfish Coordinator
National Marine Fisheries Service
Southeast Regional Office
Protected Resources Division
263 13th Avenue South
St. Petersburg, Florida 33071

Re: Smalltooth Sawfish Recovery Plan

Transmitted by email:

smalltoothsawfish.recoveryplan@noaa.gov

Dear Smalltooth Sawfish Coordinator:

This letter is submitted on behalf of the Sanibel Captiva Conservation Foundation, (SCCF), to provide comments on the Draft Smalltooth Sawfish Recovery Plan. SCCF is a non-profit conservation organization dedicated to the preservation of natural resources and wildlife habitat on and around Sanibel and Captiva Islands.

The small tooth sawfish is a longstanding species of the Caloosahatchee estuary which has fueled fisherman's stories and served to help promote the fishing industry in Lee County. Now an endangered species, any plan for recovery must be comprehensive with the goal of restoring the population by improving the habitat and water quality, both of which are also endangered in the Caloosahatchee estuary.

The natural history of this species makes early intervention imperative. Like other threatened and endangered species including the Florida panther and gopher tortoise, smalltooth sawfish are slow growing, slow to reach sexual maturity and bear few young. This combination makes population recovery a long term proposition which is dependant upon the health of the habitat as well as population dynamics.

The Recovery Plan indicates that southwest Florida waters from Charlotte Harbor to the Dry Tortugas support the largest population of smalltooth sawfish worldwide. Sawfish data suggest that concentrations in the Caloosahatchee river and estuary are as high or higher than in any other area, making the recovery of the sawfish dependant upon the health of the Caloosahatchee and estuarine habitat.

If restoration options are to be effective water quality and habitat degradation must be addressed. Earlier this year American Rivers, a non-profit group committed to protecting rivers in the United States, named the Caloosahatchee the seventh most endangered river in the country because of pollutant loading resulting from inflows

from Lake Okeechobee and the watershed. The Caloosahatchee receives more than half of all the water released from Lake Okeechobee. Releases from the lake are loaded with nutrients and other contaminants and deliver fresh water in a timing and volume that has seriously degraded the river and estuary habitat.

As a water body with the greatest concentration of smalltooth sawfish it is imperative that the conditions of the water body be addressed. These conditions include the quality of fresh water, quantity of freshwater and the timing of freshwater deliver to the estuary.

Freshwater containing high nutrient loads from agricultural runoff contributes to algal blooms, which affect aquatic vegetation, fish, and other marine life. Other negative effects of polluted freshwater releases into the Caloosahatchee include decreased water clarity, affecting light attenuation for submerged aquatic vegetation, and low oxygen levels, which kills and displaces marine life.

In addition, freshwater delivered into the estuary in an unnatural timing is another form of pollution and threat to the smalltooth sawfish. Reduced salinity as a result of freshwater releases has led to the loss of seagrass, which has resulted in the loss of marine life dependant on seagrass.

To insure an effective plan for the recovery of the smalltooth sawfish in the Caloosahatchee we recommend the recovery plan establish optimum water quality and habitat targets to include mixing zone requirements for water quality, quantity and timing of freshwater releases.

We appreciate the opportunity to comment on this important fishery and look forward to the opportunity to work together on the smalltooth sawfish recovery plan.

Sincerely,

Erick Lindblad
Executive Director