



# Audubon OF FLORIDA

2507 Callaway Road  
Suite 103  
Tallahassee, FL 32303  
Phone (850) 224-7546  
Fax (850) 224-6056

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City of New Smyrna Beach  
210 Sams Avenue  
New Smyrna Beach, FL 32168

Dear Commissioners:

On behalf of Audubon of Florida, I would like to express concern regarding the changes to recreational use at Smyrna Dunes Park which I understand you will be briefed on at this evening's commission meeting.

This park has some of the last remaining viable beach habitat for shorebirds and seabirds in Volusia County. These specialist species rely on shore habitats in some cases for breeding, hollowing out shallow scrapes in the sand to lay their perfectly camouflaged eggs. Downy young clumsily range across the beach after hatching, with only their sand-coloration and tendency to freeze in the face of danger to protect them. In other cases, these birds rely on our beaches for resting habitat on long migrations, or to fatten up over the winter in anticipation of the rigors of the spring breeding season. Inlet shores are especially valuable to these species.

The list of birds that use Smyrna Dunes Park reads like a "who's who" of imperiled shore-dependent birds in Florida: federally Threatened Piping Plovers, state Threatened Least Terns, state Species of Special Concern such as Black Skimmers and American Oystercatchers, as well as declining species on Audubon's Watch List, such as Wilson's Plovers. These birds are declining statewide because of habitat loss—not only the direct conversion of coastal habitat to human development, but also the disturbance of our "protected" areas due to recreational uses, and especially the presence of dogs.

Due to their resemblance to natural predators, even leashed dogs flush adult birds from their nests, leaving eggs and young exposed to extremes of temperatures and predators. Unleashed dogs become predators themselves. Migrating and wintering birds flushed by dogs spend precious time expending energy when they should be storing that energy to ensure they survive long overwater flights and breed successfully.

Dog owners at Smyrna Dunes Park have not been behaving responsibly. Staff have documented countless incidences of owners leaving dog feces on the boardwalks; dogs threatening and attacking park visitors and staff; dogs flushing shorebirds; dogs digging up the burrows of state Threatened gopher tortoises; and even dogs molesting research traps for imperiled beach mice. Some dog owners, when approached by staff responded responsibly, but still others responded confrontationally, necessitating the involvement of public safety officers.

This history of bad behavior resulted in the creation of a working group in which Southeast Volusia Audubon participated. Despite the natural resource value of this park, Southeast Volusia

Audubon was the only natural resource interest represented on the working group. The Florida Fish and Wildlife Conservation Commission and US Fish and Wildlife Service were not included, and Audubon was overwhelming outnumbered by the number of group members representing dog interests.

Many of our members are dog owners and we support the use of Smyrna Dunes' boardwalk for on-leash dog walking. We also have grave concern for the rapid decline of federally Threatened Piping Plovers that our surveys have documented in recent years at the park. The working group delivered a decision with which Audubon does not agree: at the expense of the natural resources, dogs will be moved off the boardwalks and will be allowed on the river and inlet shores, in those places where they are likely to cause the greatest disturbance to imperiled wildlife.

This park is not just a local asset. Its coastline has been federally designated by the US Fish and Wildlife Service as Critical Wintering Habitat for Threatened Piping Plovers. It was recognized as a site deserving of management for shorebirds in the County's Habitat Conservation Plan permitting beach driving on the County's Atlantic beaches. And in 1908, President Teddy Roosevelt designated the inlet by Executive Order as a Federal Reservation for its birdlife.

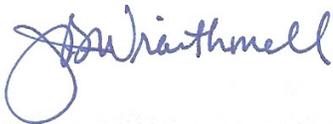
In the absence of a comprehensive natural resource management plan for this park, we fear this increased access for dogs to coastal habitats will result in disturbances to and potentially take of federal and state listed species. The county's lease from the US Coast Guard requires the park be managed in ways that will not degrade its resources, and the Coast Guard under the Endangered Species Act is required to ensure its actions do not result in take of listed species.

Rather than adopting this proposal, we ask you to call for a comprehensive natural resource management plan for the park, evaluating recreational use and dog access, as well as management improvements that could be made for the park's wildlife. The Florida Fish and Wildlife Conservation Commission has been willing to partner with the City on improvements for nesting seabirds in the park's dune interior. Additionally, the proposed shorebird protection zone should be evaluated and a protocol developed to accommodate roving young at the waterline, birds that nest outside of the zone boundaries, as well as protecting solitary nesting birds elsewhere in the park.

This park is too valuable a resource to be managed in a piecemeal way. We encourage the City to engage in a meaningful planning effort to find the best balance for people and wildlife at Smyrna Dunes. The proposal before you simply rewards the bad behavior of the few at the expense of natural resources that belong to us all.

Thank you for your consideration and leadership on this issue. We look forward to working with the City and County on improving this park for Florida's wildlife.

Sincerely,



Julie Wraithmell  
Wildlife Policy Coordinator