

FLORIDA CHAPTER
THE WILDLIFE SOCIETY

239 Bishop Drive
Gainesville, FL 32607



13 April 1984

Col. Robert M. Brantly
Executive Director
Florida Game and Fresh
Water Fish Commission
620 S. Meridian Street
Tallahassee, FL 32301

Dear Col. Brantly:

I am writing in response to your 13 March 1984 letter requesting clarification of the position of the Florida Chapter, The Wildlife Society, Inc. (FCTWS) concerning the paper "Interpretation of Florida Nongame Wildlife Statutory Mandate." I apologize for my delay in responding; your letter arrived while I was on an extended field trip to Louisiana.

I wish to clarify how this paper originated. In discussing the progress of a meeting of the Nongame Advisory Council in Tallahassee with Dr. Larry Harris, our representative on the Council, Larry informed me that Dr. Alan Egbert, of your staff had asked him to draft a section on statutory authorities for the report being prepared for submission to the Governor and Legislature. I suggested that he contact Terry Zinn, who had offered free services to the Chapter. The FCTWS did not request this paper as a result of concern that the Florida Game and Fresh Water Fish Commission (Commission) lacked authority in the areas of nongame wildlife management and research or wildlife research in general. The Executive Board, FCTWS did not review or comment on this paper prior to its submission at the Council meeting.

I have discussed this paper with the Executive Board, FCTWS and we unanimously concur in the following opinions:

1. We disagree with the statement in paragraph 1, page 1 that "The Commission is neither exclusively nor specifically authorized to do research on wild animal or freshwater aquatic life." The Florida Constitution gives the Commission the responsibility and authority for the management, protection, and conservation of wild animal life and freshwater aquatic life. As professional biologists we recognize that research is essential for meeting these responsibilities and therefore believe that authority to conduct research is implicit in the constitutional mandate. We agree that the Commission does not have exclusive authority to conduct wildlife research.

We believe the wording at the bottom of page 1 ("Like the Commission's single-minded study of game wildlife;...") to be unfortunate. We are well aware of the trend over a number of years for increasing emphasis on nongame species within the research program of the Commission. We believe this to be commendable and an indication of the Commission's ability to broaden its program beyond the arena of game species. **The breadth of the existing research program is one factor influencing our conclusion that a comprehensive nongame program should be centered within and coordinated by the Commission.** We do agree that a "wealth of expertise, personnel, and facilities for research on nongame species research (sic) lies outside the Commission." **and we strongly support and urge the utilization of that expertise in the developing nongame program.**

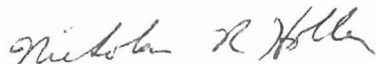
We concur with paragraph 2, page 2 that the Nongame Advisory Council should provide continuous guidance to the Commission and are pleased that you welcome such guidance as indicated in your 7 March letter to me. Obviously, we recognize that there will be times when the Council and the Commission disagree; certainly that alone would not result in a diminution of the Council's role as a functional advisory body. **We do believe that the Council can be of great value to the Commission in the guidance of the nongame program.**

4. The Executive Board, FCTWS is not prepared to comment on the suggestion that nongame funds be disbursed in a manner similar to those of the Florida Institute of Phosphate Research. **We are not adequately familiar with that fund distribution system.** We do agree with the final conclusion that "...the Commission and Council must cooperate with and tap the large capacity for research and knowledge of nongame wildlife outside the Commission." We are pleased that the final report to the Governor and Legislature reflects this view.

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I hope that the above information clarifies our position. We are strong supporters of the nongame program and stand prepared to provide all possible support towards enactment of the program as outlined in the report of the Council and Commission. We appreciate your responsiveness to our views expressed during the development of that report.

Sincerely,



Nicholas R. Holler, President
Florida Chapter, The Wildlife
Society

cc: Nongame Advisory Council
Executive Board, TWS