

CONSULTATION LETTERS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960
August 15, 2012

Mr. David Libman
National Park Service
Regional Office,
Planning & Compliance Division,
100 Alabama St.
1924 BLDG,
Atlanta, GA 3030317

Subject: Control # DES 11-63: Fort Matanzas National Monument (NM) – General
Management Plan (GMP) 12; Draft Environmental Impact Statement (DEIS).
CEQ No. 20120195 & ERP No. NPS-E61082-FL.

Dear Mr. Libman:

To fulfill EPA's Clean Air Act (CAA) § 309 and National Environmental Policy Act § 102(2)(C) (NEPA) responsibilities, EPA reviewed the above DEIS for the proposed action: the GMP. We are giving this DEIS a "Lack of Objections" rating, see enclosed "Summary of the EPA Rating System." Included below are comments we believe will strengthen the final EIS (FEIS) to meet NEPA's mandate.

Proposed Action: the GMP will provide guidance for the next 20 plus years on perpetuating natural systems, preserving cultural resources, and providing a quality visitor-experience opportunity for this NM. According to the DEIS, any proposed development consistent with the proposed action would require feasibility studies, detailed planning, and environmental documentation. GMP implementation is dependent upon available resources and consequently may occur in phases over many years.

Description: Fort Matanzas consists of nearly 300 acres on Rattlesnake and Anastasia Islands, three historic structures: the Fort, Visitor Center, HQ administrative buildings, and the Johnson House, and the Matanzas Ramp: the Atlantic Ocean beach access road. The NM is located 14 miles south of the City of St. Augustine, Florida.

Purpose & Need: The GMP's purpose is to decide how the National Park Service (NPS) can best fulfill the NM's purpose, maintain its significance, and protect its resources unimpaired for the enjoyment of present and future generations. This action is needed to update the outdated 1982 Fort Matanzas GMP as both the National Parks and Recreation Act and NPS policy mandate development of a GMP for each park.

Alternatives: The DEIS indicates five issues helped to steer the development of preliminary alternatives.¹ The visitor center space inadequacy, the recent closure of the beach to driving off designated roads, the insufficient visitor parking, visitor concern over the natural environment's

¹ P. 19.

health, and the challenge of partnering with the neighboring state parks and forests, conservation areas, and preserves were the identified five issues.

EPA Comments: the GMP appears to provide minimal if any focus on visitor concern over the natural environment's health and the challenge of partnering with the local state parks and forests, conservation areas, and preserves. The GMP appeared to focus on a different issue: providing varying degrees of cultural and natural resource interpretation opportunities.

- EPA recommends the alternatives chapter (2) further address the issues concerning natural environment's health and the partnering challenge.
 - EPA suggests the NPS consider discussing in the FEIS the concerns raised during the public meetings and in the scoping comments and how the proposed GMP alternatives address these concerns.
- EPA suggests the NPS consider "climate change," likely a common concern to all entities mentioned, as a partnering opportunity for collaboration. For example, developing a partnership to share in the following activities:
 - monitor changes and associated impacts to define climate change related cause and effect relationships,
 - identify ecosystem services provided by all entities, e.g., flooding protection during severe events and the potential for being a CO₂ sink to facilitate the climate change adaption and mitigation at the regional level, and
 - research of potential climate change adaptation and mitigation strategies that could be used by all coastal entities in the southeast.

The DEIS discusses three alternatives: the no action alternative (A), NPS-preferred/the environmentally preferred alternative (B), and alternative C. The major differences between the three alternatives appear to center on three issues: the visitor center, parking space, and degree of cultural and natural resource interpretation opportunities.

EPA Comment: the DEIS identified four options for addressing the inadequate visitor center in the purpose and need chapter (1) but did not evaluate all of these in the alternatives evaluated in the alternatives chapter (2). Chapter 2 does not address two options: physically expanding the existing building or replacing it with a new facility. The no action alternative provides for the status quo while both alternatives B and C propose supplementing existing visitor center space with space added by adaptive re-use of existing structures.²

- EPA recommends Chapter 2 either discuss all four options for addressing the inadequate space or explain why the two options identified in Chapter 1 were not considered in the alternatives analysis in Chapter 2. EPA notes Chapter 2 did not discuss these two options in its section on alternatives considered but dismissed from detailed evaluation.³

Environmental Impacts: The majority the NM is located within the 100-year flood plain. The islands associated with the NM are barrier islands. Roughly half of the total park (147.4 acres) is mapped as wetlands and approximately 100 of these wetlands acres are on Rattlesnake Island. The main body of water in the vicinity of the Fort is the Matanzas River which is characterized as an estuarine, subtidal wetland with unconsolidated bottom.

² P. 21.

³ P. 70.

EPA Comment: EPA finds it difficult to compare environmental impacts among the three alternatives evaluated. For example,

- Under the subheading “Potential Cultural Landscapes” (Alternative B), is the unexpected mention of a parking expansion for two bus spaces.⁴
 - The alternatives chapter (2) indicates the bus space expansion is proposed for alternative A⁵ not B. Moreover, no discussion of the proposed bus spaces potential environmental impacts exists in the environmental consequences chapter (4) for alternative A.⁶
- The environmental consequence chapter (4) discusses additional impacts from construction of off-beach parking for both alternative A & B⁷, yet Chapter 2 does not indicate construction of off-beach parking will occur for either alternative.
 - Chapter 4 in its alternative A discussion⁸ states, *Very few additional impacts to soils would result from clearing and construction for off-beach parking at the Matanzas ramp.*
 - Yet Chapter 2 indicates for
 - Alternative A, parking lot design changes have been implemented for safety and 2 bus spaces will be added to the visitor center parking lot,⁹ and for
 - Alternative B, the number of parking lots in the existing parking foot print would be increased and expansion of other lots could occur.
 - EPA recommends the FEIS describe the degree of expansion, e.g., quantify (acres).
- EPA recommends the FEIS be written to improve upon the DEIS’ current alternative comparisons of environmental impacts.

EPA Comment: EPA recommends the DEIS quantify where possible the impacts and consider including in its GMP development obtaining any lacking data to quantify future impacts.

The GMP describes performance indicators and standards to ensure desired conditions are being attained, e.g., number of vehicles driving outside authorized areas, number of car clouting incidents, etc.,¹⁰ but does not use these indicators to quantify impacts associated with the proposed action.

- The DEIS describes how many visitors come to the NM but doesn’t provide the number of cars to describe (quantify) the current impact and how the proposed alternatives will alleviate the current impact. Currently there are four parking lots available.
 - EPA recommends the EIS quantify where possible the anticipated environmental impacts associated with its proposed action. Examples of quantification are provided below recommended to be addressed in the EIS.
 - How many cars can be parked under alternative A, and expected to be parked under alternatives B, and C.
 - How many cars park on shoulders under alternative A, and expected to be parked under alternatives B, and C.

⁴ P. 118.

⁵ P. 39.

⁶ PP. 105 – 116.

⁷ P. 118.

⁸ P. 107.

⁹ P. 39.

¹⁰ Table 2, pp. 31-32.

- EPA recommends the FEIS address the potential displacement of parking associated with the recent closure of the beach to driving/parking. For example, how many cars are being displaced from off-road/parking areas that now may require parking in the designated existing parking lots?
- The FEIS is encouraged to address whether there are outside parking lots where arrangements can be made to shuttle visitors. Could this be a partnering opportunity with the neighboring state parks, forests, conservation areas, reserves, other entities, etc., to share parking areas and shuttle visitors between these entities?
- The impacts associated with the closure of off-road vehicles has environmental impacts that EPA recommends be discussed in the DEIS. For example,
 - The DEIS indicates impacts to fishermen without quantifying how many fishermen are affected.
 - The DEIS should discuss the impacts associated from not having the fishermen drive off road. For example,
 - The DEIS describes *the ocean beach at Fort Matanzas provides a nesting area for the threatened loggerhead and endangered green and leatherback sea turtles, the ghost crab, least tern, Wilson's plover and other migratory shorebirds and seabirds, including the endangered piping plover.*"
 - The DEIS describes state-protected species, i.e., Black Skimmer and Least Tern, that prefer nesting on open sand on beaches.
 - EPA encourages NPS to develop indicators to measure changes in these protected species populations to describe future impacts associated with the recently enacted off-road vehicle closure. Particularly since driving on the beach has been occurring since the advent of the automobile, possibly prior to the NM's establishment in 1924, and large numbers of visitors have indicated their preference for retaining access by vehicle to the beach. This data would prove valuable for NEPA purposes should NPS reconsider and seek authority to permit driving on the beach.

EPA Comment: EPA recommends further clarification in the FEIS on the identified environmental impacts to the NM.

- For example Table 6, Summary of Impacts,¹¹ under the preferred and environmentally preferred alternative B, to plant communities and vegetation are described as "local, short- and long-term, direct, minor and adverse" when compared to the no action alternative A, "long-term, adverse, negligible to minor, and localized."
 - EPA suggests the FEIS explain what does this means in context of the NM and its mission and how this is it significant.
- For example, the DEIS describes invasion by exotic/nuisance species¹² but there is no information describing the status quo, e.g., how many acres are and how densely invaded (affected environment) by exotic/nuisance species. Nor explains why this is considered to be minor. And how is that expected to change with each alternative evaluated. EPA recommends the DEIS provide more quantification and explanation to better describe the impacts.

¹¹ PP. 55 – 60.

¹² P. 108.

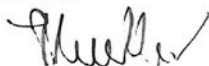
- EPA recommends the FEIS define its terminology, e.g., short and long term, adverse, negligible, minor, localized, significant impacts, etc., in context of each cultural and natural resource evaluated.

EPA Comment: EPA finds the one issue raised in the DEIS having the most potential to significantly impact the NM during the GMP's project life is the issue of increasingly diminished opportunities for the public to access the beaches, which is increasing parking pressures and collateral impacts upon the NM resource.

- The DEIS states *the resulting extra parking spaces would be beneficial to traffic circulation; however, parking would likely continue to be an issue for the park without significant increase in parking opportunities.*¹³
 - EPA's perspective is the above statement indicates the seriousness of the parking issue which does not appear to be addressed by the proposed action.
- The DEIS states *Public access to the beach is a growing problem in the area with the increase in condominiums; the public access areas have been diminished.*¹⁴
- EPA recommends the GMP include indicators to measure parking pressures upon the NM associated with declining public beach access associated with development.
- EPA recommends the GMP discuss how the NPS mission is impacted if it is the default option to providing public beach access to replace the access reduced by private development. The DEIS states *Regional growth is expected to result in increased development in the vicinity of the monument.*¹⁵
- EPA recommends the minor discussion contained in the DEIS' cumulative effects discussion be expanded to fully discuss the potential parking needs associated with loss of formerly public beach access and its associated impacts to the GMP's purpose: to decide how NPS can best maintain the NM's significance and protect its resources unimpaired for the enjoyment of present and future generations.

We thank you for the opportunity to review and comment on this DEIS. If you wish to discuss this matter further, please contact me (404-562-9611 or Mueller.heinz@epa.gov) or Beth Walls (404-562-8309 or walls.beth@epa.gov) of my staff.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Enclosure: EPA Rating System

¹³ P. 116.

¹⁴ P. 102.

¹⁵ P. 114.

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION ¹

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant

¹ From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment.



United States Department of the Interior

U. S. FISH AND WILDLIFE SERVICE

7915 BAYMEADOWS WAY, SUITE 200
JACKSONVILLE, FLORIDA 32256-7517

IN REPLY REFER TO:

FWS Log Nos. 41910-2012-CPA-0027

August 22, 2012

Mr. David Libman, GMP Project Manager
National Park Service
Southeast Regional Office
Atlanta Federal Center, 1924 Building
100 Alabama St., SW.
Atlanta, Georgia 30303

Re: Review of Draft General Management Plan and Environmental Impact Statement for Fort Matanzas National Monument, St. Augustine, St. Johns County, Florida

Dear Mr. Libman:

Our office has reviewed your correspondence dated June 29, 2012 and its accompanying draft General Management Plan (GMP) and Environmental Impact Statement (EIS) for Fort Matanzas National Monument (Fort Matanzas). We coordinated previously with the National Park Service (NPS) in its initial document planning and preparation, and appreciate the opportunity for additional input under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 *et seq.*).

The draft GMP and EIS considers three alternatives for guiding the future management of Fort Matanzas over the next 20 years. Alternative A is the "no-action" alternative and describes how NPS currently manages Fort Matanzas. It includes a prohibition against beach driving. Alternative B, the NPS preferred alternative, is similar to "A" in that it retains the current natural resource conditions and associated management actions, including the beach driving ban, but differs in that there is increased emphasis on minimal modification of the natural environment, low impact recreational activities, and interpretation of natural resources. Alternative C places more emphasis on cultural history and park evolution, with commensurate increases in interpretative experiences that could include some expansion of recreational trail and board walk opportunities. It most notably would allow for some level of beach driving, but only following enactment of a special regulation, and completion of an Off-Road Vehicle (ORV) Plan and Environmental Impact Statement.

The lands comprising Fort Matanzas National Monument and its contiguous waters support diverse Federal Trust Resources. The maritime hammock, remnant coastal scrub, and coastal sand dune communities include numerous foraging and nesting migratory birds, the gopher tortoise (*Gopherus polyphemus*), a Federal candidate for listing, and the southernmost local population of the federally endangered Anastasia Island beach mouse (*Peromyscus polionotus phasma*). The mosaic of uplands and wetlands within and adjacent to Fort Matanzas combined are of sufficient size to support the federally threatened Eastern indigo snake (*Drymarchon corais couperi*). Sea turtle species that have or are capable of nesting on the Fort Matanzas ocean beach include the loggerhead (*Caretta caretta*), green (*Chelonia mydas*), leatherback (*Dermochelys coriacea*) and Kemp's ridley (*Lepidochelys kempii*) sea turtles. The listed piping plover (*Charadrius melodus*) and red knot (*Calidris canutus rufa*), another candidate for Federal listing, use upper and lower beach habitat contiguous to Fort Matanzas, as well as emergent sand shoals within the Matanzas River and Matanzas Inlet adjacent to Fort Matanzas, for temporary roosting and foraging during their annual migrations. The endangered wood stork (*Mycteria americana*) uses

uplands and wetlands within park boundaries for roosting and foraging, respectively. The adjacent estuarine and marine waters support the listed West Indian (Florida) manatee (*Trichechus manatus latirostris*). Shorebirds of special note that nest within beach or dune habitats include the least tern (*Sterna antillarum*), Wilson's plover (*Charadrius wilsonia*), and willett (*Catoptrophorus semipalmatus*). Although the threatened Florida scrub-jay (*Aphelocoma coerulescens*) occurred on the property at one time, none have been observed in recent years (Kurt Foote, National Park Service, personal communication 2012).

Based on the diversity of species and habitats occurring within and adjacent to Fort Matanzas National Monument, and the descriptions of its proposed general management alternatives covering the next 20 years, we support NPS's selection of Alternative B as the preferred management alternative. That alternative provides the maximum protection and conservation of Federal Trust and other natural resources associated with the park. We recognize and accept the possibility of some parking lot expansion in lieu of driving and parking on the beach. We expect to work with NPS through section 7 consultation to avoid and minimize potential adverse effects to beach mice, sea turtles, and other species and their habitats from such expansions, or other specific actions arising from selection of this management alternative.

We have also reviewed the specific details of the draft GMP, and as a result are providing two attachments to this letter. Attachment A contains our recommendations for specific changes to the draft GMP. Attachment B is a list of our current office and regional points of contact for the conservation and recovery of listed species, their habitats, and other Federal Trust Resources. We recommend that NPS utilize these contacts for assistance before, during, and after the development of more detailed planning efforts intended to prioritize and implement the specific programs, projects, and actions arising from the GMP.

Thank you again for the opportunity to review and comment on the draft General Management Plan for Fort Matanzas National Monument. If you have any questions regarding this response, please contact Mr. John Milio of my staff at the address on the letterhead, by e-mail at john_milio@fws.gov, or by calling 904-731-3098.

Sincerely,



for David L. Hankla
Field Supervisor

Encl as:

cc:

Cindy Fury, Leader
Florida/Caribbean Field Office
Migratory Bird Program, USFWS
Tallahassee, FL

Scott Sanders, Director
Office of Conservation Planning
Florida Fish and Wildlife Conservation Commission
620 South Meridian Street
Tallahassee, Florida 32399

ATTACHMENT A

Specific Comments on Draft General Management Plan

Page 31, Table 2, column 1, row 1: Replace with “**Number of unauthorized vehicles and pedestrians within ‘authorized access only’ areas**”

Page 31, Table 2, column 3, row 1: Add “.....**and pedestrians**”

Page 33, lines 21 through.....: Include specific descriptions of the management zones

Page 84, Table 12, column 2, row 22: Replace “**coatwhip**” with “**coachwhip**”

Page 86, line 46: Delete “.....**which is enforced by the USFWS**”

Pages 86-87, Table 14: Delete references to Florida scrub-jay and hawksbill sea turtle

Page 110, Table 17: Delete references to Florida scrub-jay and hawksbill sea turtle

Page 128, line 5: Insert “The operation of motor vehicles on the beach affects sea turtle nesting by interrupting or striking a female turtle on the beach, headlights disorienting or misorienting emergent hatchlings, vehicles running over hatchlings attempting to reach the ocean, and vehicle tracks traversing the beach that interfere with hatchlings crawling to the ocean. Hatchlings appear to become diverted not because they cannot physically climb out of the rut (Hughes and Caine 1994), but because the sides of the track cast a shadow and the hatchlings lose their line of sight to the ocean horizon (Mann 1977). The extended period of travel required to negotiate tire tracks and ruts may increase the susceptibility of hatchlings to dehydration and depredation during migration to the ocean (Hosier *et al.* 1981). Driving on the beach can cause sand compaction which may result in adverse impacts on nest site selection, digging behavior, clutch viability, and emergence by hatchlings, decreasing nest success and directly killing pre-emergent hatchlings (Mann 1977, Nelson and Dickerson 1987, Nelson 1988).

The physical changes and loss of plant cover caused by vehicles on dunes can lead to various degrees of instability, and therefore encourage dune migration. As vehicles move either up or down a slope, sand is displaced downward, lowering the trail. Since the vehicles also inhibit plant growth, and open the area to wind erosion, dunes may become unstable, and begin to migrate. Unvegetated sand dunes may continue to migrate across stable areas as long as vehicle traffic continues. Vehicular traffic through dune breaches or low dunes on an eroding beach may cause an accelerated rate of overwash and beach erosion (Godfrey *et al.* 1978). If driving is required, the area where the least amount of impact occurs is the beach between the low and high tide water lines. Vegetation on the dunes can quickly reestablish provided the mechanical impact is removed.”

Page 148, Table: Delete references to Florida scrub-jay and hawksbill sea turtle

Page 149, lines 77-80: Provide update on 12-month status review finding on wood stork

Page 149, lines 86-88: Replace with “.....occurs primarily at the northern (Anastasia State Park and southern (Fort Matanzas) ends of its range, and at isolated sites in-between

Page 151, Lines 70-97: Delete

Page 152, lines 20-23: Delete, Include updated information-on the listing revision from the single global threatened species to a listing of nine Distinct Population Segments (DPS). Loggerheads that nest on Fort Matanzas National Monument belongs to the Northwest Atlantic Ocean DPS and are listed as threatened. More information can be found at the following weblink: <http://www.nmfs.noaa.gov/pr/pdfs/fr/fr76-58868.pdf>

Page 155, line 14: Update Federal status using the following link
http://www.fws.gov/northflorida/Releases-11/20110726_nr_Gopher_Tortoise-12-month_Warranted_but_Precluded_Finding_Eastern_Portion_of_range.html

Page 158 – 159: Insert

Godfrey, P.J., S.P. Leatherman, and P.A. Buckley. 1978. Impact of off-road vehicles on coastal ecosystems. Pages 581-599 *in* Coastal Zone '78 Symposium on Technical, Environmental Socioeconomic and Regulatory Aspects of Coastal Zone Management. Vol. II, San Francisco, California.

Hughes, A.L. and E.A. Caine. 1994. The effects of beach features on hatchling loggerhead sea turtles. Pages 237 *in* Bjorndal, K.A., A.B. Bolten, D.A. Johnson, and P.J. Eliazar (compilers). Proceedings of the Fourteenth Annual Symposium on Sea Turtle Biology and Conservation. NOAA Technical Memorandum NMFS-SEFSC-351.

Mann, T.M. 1977. Impact of developed coastline on nesting and hatchling sea turtles in southeastern Florida. Unpublished Master of Science thesis. Florida Atlantic University, Boca Raton, Florida.

Nelson, D.A. and D.D. Dickerson. 1987. Correlation of loggerhead turtle nest digging times with beach sand consistency. Abstract of the 7th Annual Workshop on Sea Turtle Conservation and Biology.

Nelson, D.A. 1988. Life history and environmental requirements of loggerhead turtles. U.S. Fish and Wildlife Service Biological Report 88(23). U.S. Army Corps of Engineers TR EL-86-2 (Rev.)



United States Department of the Interior

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IN REPLY REFER TO:

FWS Log Nos. 04EF1000-20 12-CPA-0027/12-I-0250

August 31, 2012

Mr. David Libman, GMP Project Manager
National Park Service
Southeast Regional Office
Atlanta Federal Center, 1924 Building
100 Alabama St., SW.
Atlanta, Georgia 30303

Re: Response to Request for Concurrence with Determination of Effects on Federally Listed Species for the Draft General Management Plan and Environmental Impact Statement (GMP/EIS): Fort Matanzas National Monument, St. Augustine, St. Johns County, Florida

Dear Mr. Libman:

Our office has reviewed your correspondence dated August 13, 2012 regarding the National Park Service's (NPS) selection of a preferred alternative for its draft GMP/EIS, and its effects on federally listed species that occur on Fort Matanzas. We provide the following comments in accordance with section 7 of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*).

Under preferred alternative B, the current ban on beach driving within Fort Matanzas would continue. To address this issue, alternative B considers potential minor expansions of existing parking areas on either side of Highway A1A. Its other features include continued natural resource inventory, monitoring, and mapping; removal of invasive, exotic, and nuisance species; and increased interpretation of the natural environment.


The NPS determined that alternative B would either not affect, or would not be likely to adversely affect, nesting and hatchling sea turtles, the eastern indigo snake, manatee, Anastasia Island beach mouse, wood stork, Florida scrub-jay, and piping plover. Given that Fort Matanzas is within the nesting range of the loggerhead (*Caretta caretta*), green (*Chelonia mydas*), leatherback (*Dermochelys coriacea*), and Kemp's ridley (*Lepidochelys kempii*) sea turtles, we expect no adverse effects to these species, and no effect for the Hawksbill sea turtle (*Eretmochelys imbricata*), which does not nest in northeast Florida. We concur with the determinations for the eastern indigo snake (*Drymarchon corais couperi*), West Indian (Florida) manatee (*Trichechus manatus latirostris*), beach mouse (*Peromyscus polionotus phasma*), and wood stork (*Mycteria americana*). Given their presence on beaches within Fort Matanzas, we expect the continued driving ban, pet policy, and control of invasive, exotic, and nuisance species will result in no adverse effects on wintering piping plovers (*Charadrius melodus*). The Florida scrub-jay (*Aphelocoma coerulescens*) is not currently present within Fort Matanzas or contiguous habitat. As a result, we expect the selection of preferred alternative B to have no effect on this species.

The Gopher tortoise (*Gopherus polyphemus*) is a candidate for Federal listing and no determination of effects is required at this time. The red knot (*Calidris canutus rufa*) is a migratory shorebird that occurs within and contiguous to Fort Matanzas, and is also a Federal candidate for listing. The NPS should monitor both species for any future change in their listing status.

Although this does not represent a biological opinion as described in section 7 of the Act, it does fulfill the requirements of the Act and no further action is required. The NPS in its GMP/EIS has indicated that it will undertake separate section 7 consultations with our office on future actions resulting from its implementation of the preferred alternative. In addition, selection of a different alternative or changes to the preferred alternative that results from public input may increase the risk of adverse effects from the GMP/EIS to a level at which take of federally listed species is reasonably certain to occur. Under such circumstances, or should there be changes to the listing status of the gopher tortoise and red knot, NPS should consider seeking the assistance of this office to ascertain if additional ESA consultation is needed prior to accepting the draft final GMP/EIS.

If you have any questions regarding this response, please contact Mr. John Milio of my staff at the address on the letterhead, by email (john_milio@fws.gov) or by calling (904)-731-3098.

Sincerely,


for David L. Hankla
Field Supervisor



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
(727) 824-5317; FAX (727) 824-5300
<http://sero.nmfs.noaa.gov/>

August 17, 2012

F/SER47:GG/pw

(Sent via Electronic Mail)

Mr. Gordon Wilson, Superintendent
Fort Matanzas National Monument
8635 A1A South
St. Augustine, FL 32080

Dear Mr. Wilson:

NOAA's National Marine Fisheries Service (NMFS) reviewed the National Park Service (NPS) Draft General Management Plan and Environmental Impact Statement for Fort Matanzas National Monument, St. Johns County, Florida. The NPS preferred alternative (Alternative B) would manage the National Monument in a manner consistent with its history as a small military outpost within a sometimes harsh, but rich natural environment. There would be minimal development of new facilities or expansion of existing facilities. The primary interpretive themes of the park would continue to be the fort, its construction from locally available coquina stone, and its strategic location relative to the defense of St. Augustine. Under the NPS preferred alternative, there would be increased emphasis on the educating the public about the park's natural environment.

NMFS supports the NPS preferred alternative and the decision to continue the ban on beach driving within the park due to the potential for direct and indirect adverse impacts fish and wildlife from the physical disturbance of the vehicles. NMFS recommends the final Management Plan and Environmental Impact Statement include a section on Essential Fish Habitat (EFH) given the prevalence of beach, marsh, and intertidal habitat within the National Monument and nearby Matanzas Inlet. NMFS staff would be happy to assist NPS with development of this material, and NMFS looks forward to working with the NPS on living shoreline projects, similar to the ongoing project at Castillo de San Marco, as well as other habitat restoration and enhancement projects.

Thank you for providing the opportunity to comment on this project. Mr. George Getsinger, at our Marineland Office, is available if further assistance is needed. He may be reached at 9741



Ocean Shore Blvd, St. Augustine, Florida 32080, by phone at (904) 471-8674, or by email at George.Getsinger@noaa.gov.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc:

NPS, Gordon_Wilson@nps.gov, Kurt_Foote@nps.gov, Jehu_Walker@nps.gov,
David_Libman@nps.gov
EPA, Eric.H.Hughes@usace.army.mil
FWS, John_Milio@fws.gov
SAFMC, Roger.Pugliese@safmc.net
GTM NERR, michael.shirley@dep.state.fl.us
SFWMD, cwentzel@sjrwmd.com
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**Florida Fish
and Wildlife
Conservation
Commission**

Commissioners
Kenneth W. Wright
Chairman
Winter Park

Kathy Barco
Vice Chairman
Jacksonville

Ronald M. Bergeron
Fort Lauderdale

Richard A. Corbett
Tampa

Allese P. "Liesa" Priddy
Immokalee

Charles W. Roberts III
Tallahassee

Brian S. Yablonski
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Executive Staff
Nick Willey
Executive Director
Greg Holder
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Karen Ventimiglia
Chief of Staff

Office of the
Executive Director
Nick Willey
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August 16, 2012

Ms. Sally Mann, Director
Office of Intergovernmental Programs
Department of Environmental Protection
3900 Commonwealth Boulevard, Mail Station 47
Tallahassee, FL 32399-3000
Sally.mann@dep.state.fl.us

Re: SAI #FL201207116294C – National Park Service – Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS) for Fort Matanzas National Monument, St. Johns County

Dear Ms. Mann:

Florida Fish and Wildlife Conservation Commission staff has reviewed the Draft General Management Plan/Environmental Impact Statement (GMP/EIS) for the Fort Matanzas National Monument. FWC staff provides the following comments, in accordance with the National Environmental Policy Act and the Coastal Zone Management Act/Florida Coastal Management Program.

Background

The National Park Service (NPS) has developed a draft General Management Plan (GMP)/Environmental Impact Statement (EIS) to provide guidance for the management of Fort Matanzas National Monument (hereinafter "Fort Matanzas") during the next 20 years. The purpose of the GMP is to provide comprehensive guidance for maintaining natural systems, preserving cultural resources, and providing opportunities for visitor experiences at Fort Matanzas. The existing GMP (approved in 1982) did not address many issues facing the park today. The currently proposed GMP/EIS analyzes three alternatives for management of Fort Matanzas:

1. Alternative A is the "no-action" alternative with continuation of existing management practices.
2. Alternative B is NPS' preferred alternative, which proposes:
 - a. Exploration of adaptive use of existing buildings to meet the needs of increased visitation
 - b. Additional parking spaces at the visitors' center within the footprint of the existing parking lots
 - c. Expansion of other existing parking lots if adverse impacts to natural resources can be avoided
 - d. Continuation of interpretation activities centered on the historical nature of the Fort
 - e. Expanded interpretation of the natural environment
 - f. Emphasis on low-impact recreation
3. Alternative C proposes:

- a. Further interpretive emphasis on the historical resources and cultural importance of Fort Matanzas and its structures
- b. Focus on the Anastasia Island section of Fort Matanzas, west of U.S. Highway A1A and the visitors' center
- c. Expansion of parking at the beach ramp, parking areas at the south end of Anastasia Island and the visitors' center
- d. Beach driving: this requires that NPS prepare, as a part of this EIS, an off-road vehicle plan and environmental impact analysis. This requirement, per Executive Order 1164 (1971), and as amended by Executive Order 11989 (1977), establishes limits and prohibitions on the use of off-road vehicles on public Federal lands, and mandates the development of an off-road vehicle plan and an environmental impact analysis be conducted if under consideration.

In 2008, NPS solicited comments on a previous version of a draft GMP/EIS for Fort Matanzas that included the above alternatives plus an additional Alternative D. Alternative D had proposed the expansion of visitor access areas and the continuation of beach driving; however, Alternative D was excluded from further consideration in the current GMP/EIS. In a letter dated June 12, 2008, FWC provided comments regarding the impacts of beach driving to wildlife and the management of natural resources. Further, FWC staff commented that, if beach driving were to be continued, the inclusion of measures to avoid, minimize, and mitigate the take of protected species, and/or permitting from both FWC and U.S. Fish and Wildlife Service may be necessary. FWC staff also recommended the re-establishment of the Matanzas Inlet Critical Wildlife Area (CWA) which could enhance management provisions of the GMP and protect natural resources.

Comments and Recommendations

We are supportive of the NPS's continued commitment to managing and preserving its natural and cultural resources, and for providing opportunities for a variety of visitor experiences. The Preferred Alternative emphasizes preservation, enhancement, and interpretation of the natural and cultural resources of Fort Matanzas, while also protecting state and federally listed species and their habitat. We support the Preferred Alternative and provide the following additional recommendations to aide in GMP implementation.

Future Studies and Implementation Plans

Fire Management Plan

The GMP/EIS identifies the need for more detailed studies and plans necessary for implementation, including the need for a fire management plan. The NPS requires all parks with vegetation that will sustain fire (such as coastal scrub) to have a fire management plan. The FWC supports this effort and encourages Fort Matanzas staff to partner with other agencies, such as the Florida Forest Service, St. Johns County, Anastasia State Park, Merritt Island National Wildlife Refuge, Canaveral National Seashore, and Guana Tolomato Matanzas National Estuarine Research Reserve, for assistance in managing the dune systems within Fort Matanzas.

Alternative mechanical management techniques could result in soil disturbance or impact wildlife habitat by affecting the stability of the coastal scrub and dune systems. In general, prescribed burning improves the herbaceous species coverage of habitats and would reduce the likelihood that the coastal scrub would succeed into a coastal hammock. In addition, a number of wildlife species [e.g., the gopher tortoise (*Gopherus polyphemus*; State-listed Threatened species) and the Anastasia Island beach mouse (*Peromyscus polionotus phasma*; Federally listed Endangered species)] are dependent upon the coastal scrub and dunes and could benefit from prescribed fire management.

Resource Stewardship Strategy

Fort Matanzas and the nearby Anastasia State Park are believed to be the only two sites in Florida currently considered viable to support long-term populations of the Anastasia Island beach mouse (*Peromyscus polionotus phasma*; Federally Endangered) (Frank and Humphrey 1996; Humphrey 1987; Humphrey 1992). Additionally, the Fort Matanzas beach includes important nesting habitat for least terns (*Sterna antillarum*; State-listed Threatened species) and other beach-nesting birds. We encourage Park staff to continue surveying and monitoring these species populations in Fort Matanzas. Also, continued efforts to control nuisance, exotic and predatory species will greatly benefit these habitats and associated endemic wildlife species.

Prior to any disturbance of natural habitat for the proposed expansion of parking areas or for enhancements to recreational or other facilities, we recommend that surveys be conducted to determine the abundance of beach mice at those sites and for other listed wildlife species. If take of listed wildlife cannot be avoided, please contact FWC to discuss minimization, mitigation or permitting alternatives.

Critical Wildlife Area Designation

FWC staff recommends that the GMP support FWC's re-establishment of the Matanzas Inlet CWA, with revised and expanded boundaries within Fort Matanzas. The current boundaries of the CWA limit management options and the ability to protect beach mice, gopher tortoises, least terns and other beach-nesting birds. Revised boundaries could encompass a larger portion of the park and the naturally shifting distributions of listed species and their habitats. Within CWA boundaries, we suggest that public access be restricted in posted portions of the CWA; such posting efforts could be coordinated with NPS staff. We also recommend that beach mouse habitat within dunes and coastal scrub be posted year-round. Shorebird and seabird nesting areas should continue to be posted seasonally (April – August) as is currently practiced. Additionally, the re-establishment of the CWA allows FWC law enforcement staff to better assist NPS staff and local law enforcement, leading to more effective protection measures for natural resources at Fort Matanzas.

FWC staff finds the proposed draft General Management Plan/Environmental Impact Statement for Fort Matanzas National Monument consistent with our authorities under Chapter 379, Florida Statutes. We appreciate the opportunity to continue to work with Fort Matanzas staff on the formulation of future management practices, wildlife surveys, and research opportunities. If you need any further assistance, please do not hesitate to

contact Jane Chabre either by phone (850) 410-5367 or at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Laura DiGruttolo at (386) 758-0525 or by email at Laura.Digruttolo@MyFWC.com.

Sincerely,



Bonita Gorham
Land Use Planning Program Administrator
Office of Conservation Planning Services

bg/jg/ld

ENV 1-2-2

Fort Matanzas National Monument Draft GMP – EIS_16430_081612

cc: David Libman, GMP Project Leader
National Park Service
Southeast Regional Office
100 Alabama Street, 1924 Bldg.
Atlanta, GA 30303
David_libman@nps.gov

Gordie Wilson, Superintendent
Fort Matanzas National Monument
8635 A1A South
St. Augustine, FL 32080
Gordie_Wilson@nps.gov

References:

- Frank, P.A. and S.R. Humphrey. 1996. Populations, habitat requirements, and management of the endemic Anastasia Island beach mouse (*Peromyscus polionotus phasma*), emphasizing the potential threat of exotic house mice (*Mus musculus*). Florida Game and Freshwater Fish Commission Nongame Project Report NG88-001. 46 pp.
- Humphrey, S.R. 1987. Status survey of seven Florida mammals. Florida Cooperative Fish and Wildlife Research Unit Tech. Rept. No. 25. Gainesville, FL. 39 pp.
- Humphrey, S.R. 1992. Anastasia Island Beach Mouse. Pages 94-101. In S.R. Humphrey, ed., Rare and Endangered Biota of Florida, Volume I: Mammals. University Presses of Florida. Gainesville. 392 pp.



Florida Department of Environmental Protection

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Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 21, 2012

Mr. David Libman, Project Manager
Southeast Regional Office
National Park Service
100 Alabama Street SW, 1924 Bldg.
Atlanta, GA 30303

RE: National Park Service – Draft General Management Plan and
Environmental Impact Statement for Fort Matanzas National
Monument – St. Johns County, Florida.
SAI # FL201207116294C

Dear Mr. Libman:

The Florida State Clearinghouse has coordinated a review of the referenced Draft General Management Plan/ Environmental Impact Statement (GMP/ EIS) under the following authorities: Presidential Executive Order 12372; § 403.061(42), *Florida Statutes*; the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended.

The Florida Fish and Wildlife Conservation Commission (FWC) offers the following comments and recommendations on the Draft GMP/ EIS for Preferred Alternative B:

- The National Park Service (NPS) requires all parks with vegetation that will sustain fire (such as coastal scrub) to have a fire management plan. The FWC supports this effort and encourages Fort Matanzas staff to partner with other resource management agencies for assistance in managing the dune systems within Fort Matanzas.
- FWC encourages NPS staff to continue surveying and monitoring listed species populations in Fort Matanzas. Also, continued efforts to control nuisance, exotic and predatory species will greatly benefit these habitats and associated endemic wildlife species. If take of listed wildlife species cannot be avoided during construction or management activities, please contact the FWC to discuss minimization, mitigation or permitting alternatives.
- FWC staff recommends that the GMP support the FWC's re-establishment of the Matanzas Inlet Critical Wildlife Area (CWA), with revised and expanded boundaries within Fort Matanzas. Within the CWA boundaries, staff recommends

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Mr. David Libman
August 21, 2012
Page 2 of 3

posting certain habitat areas and suggests that public access be restricted in posted portions as coordinated with NPS staff.

The FWC appreciates the opportunity to continue to work with the NPS on the formulation of future management practices, wildlife surveys and research opportunities. Please see the enclosed FWC letter for additional details regarding the issues listed above. If you have specific technical questions or need further assistance, please contact Ms. Laura DiGruttolo at (386) 758-0525 or Laura.DiGruttolo@MyFWC.com.

The Florida Department of Environmental Protection's (DEP) Northeast District Office in Jacksonville notes that the Draft GMP/EIS did not include a clear description of the location or extent of the proposed parking lot expansion project or a current wetland delineation to determine whether the proposed construction activities would involve impacts to wetlands. Activities that impact wetlands or surface waters or increase the amount of impervious surface will require an Environmental Resource Permit from the DEP Northeast District Office. Staff advises that the applicant would need to provide a proposed work plan, wetland delineation and mitigation proposal for any potential impacts to wetlands. Please contact Ms. Connie Webel for additional information and assistance at (904) 256-1652.

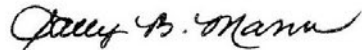
The Florida Department of State (DOS) has reviewed the Draft GMP/EIS and notes that several historic resources are recorded within the park, and other unrecorded resources may be present. Although staff concurs with the planned management actions, cultural resource surveys will be necessary prior to any new construction or excavation on park lands. Such projects will require review by the DOS Review and Compliance Section. Please refer to the enclosed DOS letter for further details.

Based on the information contained in the Draft GMP/EIS and the enclosed agency comments, the state has determined that, at this stage, the proposed federal activities are consistent with the Florida Coastal Management Program (FCMP). To ensure the project's continued consistency with the FCMP, the concerns identified by our reviewing agencies must be addressed prior to project implementation. The state's continued concurrence will be based on the activities' compliance with FCMP authorities, including federal and state monitoring of the activities to ensure their continued conformance, and the adequate resolution of issues identified during this and subsequent regulatory reviews. The state's final concurrence of the project's consistency with the FCMP will be determined during the environmental permitting process in accordance with Section 373.428, *Florida Statutes*, if applicable.

Mr. David Libman
August 21, 2012
Page 3 of 3

Thank you for the opportunity to review the Draft GMP/EIS. Should you have any questions regarding this letter, please contact Ms. Suzanne E. Ray at (850) 245-2172.

Yours sincerely,



Sally B. Mann, Director
Office of Intergovernmental Programs

SBM/ser
Enclosures

cc: Scott Sanders, FWC
Sheena Chin-Greene, DEP Northeast District
Laura Kammerer, DOS

Florida State Clearinghouse



Florida

Department of Environmental Protection

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Categories

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Project Information	
Project:	FL201207116294C
Comments Due:	08/16/2012
Letter Due:	09/04/2012
Description:	NATIONAL PARK SERVICE - DRAFT GENERAL MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT FOR FORT MATANZAS NATIONAL MONUMENT - ST. JOHNS COUNTY, FLORIDA.
Keywords:	NPS - DRAFT GMP/EIS FOR FORT MATANZAS NATIONAL MONUMENT - ST. JOHNS CO.
CFDA #:	15.916
Agency Comments:	
FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION	
<p>The FWC offers the following comments and recommendations on the Draft GMP/EIS for Preferred Alternative B: - The National Park Service (NPS) requires all parks with vegetation that will sustain fire (such as coastal scrub) to have a fire management plan. The FWC supports this effort and encourages Fort Matanzas staff to partner with other resource management agencies for assistance in managing the dune systems within Fort Matanzas. - FWC encourages NPS staff to continue surveying and monitoring listed species populations in Fort Matanzas. Also, continued efforts to control nuisance, exotic and predatory species will greatly benefit these habitats and associated endemic wildlife species. If take of listed wildlife species cannot be avoided during construction or management activities, please contact the FWC to discuss minimization, mitigation or permitting alternatives. - FWC staff recommends that the GMP support the FWC's re-establishment of the Matanzas Inlet Critical Wildlife Area (CWA), with revised and expanded boundaries within Fort Matanzas. Within the CWA boundaries, staff recommends posting certain habitat areas and suggests that public access be restricted in posted portions as coordinated with NPS staff. FWC appreciates the opportunity to continue to work with the NPS on the formulation of future management practices, wildlife surveys and research opportunities. Please see the enclosed FWC letter for additional details regarding the issues listed above. If you have specific technical questions or need further assistance, please contact Ms. Laura DiGruttolo at (386) 758-0525 or Laura.DiGruttolo@MyFWC.com.</p>	
TRANSPORTATION - FLORIDA DEPARTMENT OF TRANSPORTATION	
No Comments from FDOT District Two.	
NE FLORIDA RPC - NORTHEAST FLORIDA REGIONAL PLANNING COUNCIL	
The Draft Plan/EIS was found to be consistent with the goals and policies of the Northeast Florida Strategic Regional Policy Plan.	
ST. JOHNS - ST. JOHNS COUNTY	
No Comments	
ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	
<p>The DEP's Northeast District Office in Jacksonville notes that the Draft GMP/EIS did not include a clear description of the location or extent of the proposed parking lot expansion project or a current wetland delineation to determine whether the proposed construction activities would involve impacts to wetlands. Activities that impact wetlands or surface waters or increase the amount of impervious surface will require an Environmental Resource Permit from the DEP Northeast District. Staff advises that the applicant would need to provide a proposed work plan, wetland delineation and mitigation proposal for any potential impacts to wetlands. Please contact Ms. Connie Weibel for additional information and assistance at (904) 256-1652.</p>	
STATE - FLORIDA DEPARTMENT OF STATE	
<p>The DOS has reviewed the Draft GMP/EIS and notes that several historic resources are recorded within the park, and other unrecorded resources may be present. Although staff concurs with the planned management actions, cultural resource surveys will be necessary prior to any new construction or excavation on park lands. Such projects will require review by the DOS Review and Compliance Section.</p>	
ST. JOHNS RIVER WMD - ST. JOHNS RIVER WATER MANAGEMENT DISTRICT	
SRWMD does not have any comments.	



**Florida Fish
and Wildlife
Conservation
Commission**

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Kathy Barco
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Jacksonville

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August 16, 2012

Ms. Sally Mann, Director
Office of Intergovernmental Programs
Department of Environmental Protection
3900 Commonwealth Boulevard, Mail Station 47
Tallahassee, FL 32399-3000
Sally.mann@dep.state.fl.us

Re: SAI #FL201207116294C – National Park Service – Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS) for Fort Matanzas National Monument, St. Johns County

Dear Ms. Mann:

Florida Fish and Wildlife Conservation Commission staff has reviewed the Draft General Management Plan/Environmental Impact Statement (GMP/EIS) for the Fort Matanzas National Monument. FWC staff provides the following comments, in accordance with the National Environmental Policy Act and the Coastal Zone Management Act/Florida Coastal Management Program.

Background

The National Park Service (NPS) has developed a draft General Management Plan (GMP)/Environmental Impact Statement (EIS) to provide guidance for the management of Fort Matanzas National Monument (hereinafter "Fort Matanzas") during the next 20 years. The purpose of the GMP is to provide comprehensive guidance for maintaining natural systems, preserving cultural resources, and providing opportunities for visitor experiences at Fort Matanzas. The existing GMP (approved in 1982) did not address many issues facing the park today. The currently proposed GMP/EIS analyzes three alternatives for management of Fort Matanzas:

1. Alternative A is the "no-action" alternative with continuation of existing management practices.
2. Alternative B is NPS' preferred alternative, which proposes:
 - a. Exploration of adaptive use of existing buildings to meet the needs of increased visitation
 - b. Additional parking spaces at the visitors' center within the footprint of the existing parking lots
 - c. Expansion of other existing parking lots if adverse impacts to natural resources can be avoided
 - d. Continuation of interpretation activities centered on the historical nature of the Fort
 - e. Expanded interpretation of the natural environment
 - f. Emphasis on low-impact recreation
3. Alternative C proposes:

- a. Further interpretive emphasis on the historical resources and cultural importance of Fort Matanzas and its structures
- b. Focus on the Anastasia Island section of Fort Matanzas, west of U.S. Highway A1A and the visitors' center
- c. Expansion of parking at the beach ramp, parking areas at the south end of Anastasia Island and the visitors' center
- d. Beach driving: this requires that NPS prepare, as a part of this EIS, an off-road vehicle plan and environmental impact analysis. This requirement, per Executive Order 1164 (1971), and as amended by Executive Order 11989 (1977), establishes limits and prohibitions on the use of off-road vehicles on public Federal lands, and mandates the development of an off-road vehicle plan and an environmental impact analysis be conducted if under consideration.

In 2008, NPS solicited comments on a previous version of a draft GMP/EIS for Fort Matanzas that included the above alternatives plus an additional Alternative D. Alternative D had proposed the expansion of visitor access areas and the continuation of beach driving; however, Alternative D was excluded from further consideration in the current GMP/EIS. In a letter dated June 12, 2008, FWC provided comments regarding the impacts of beach driving to wildlife and the management of natural resources. Further, FWC staff commented that, if beach driving were to be continued, the inclusion of measures to avoid, minimize, and mitigate the take of protected species, and/or permitting from both FWC and U.S. Fish and Wildlife Service may be necessary. FWC staff also recommended the re-establishment of the Matanzas Inlet Critical Wildlife Area (CWA) which could enhance management provisions of the GMP and protect natural resources.

Comments and Recommendations

We are supportive of the NPS's continued commitment to managing and preserving its natural and cultural resources, and for providing opportunities for a variety of visitor experiences. The Preferred Alternative emphasizes preservation, enhancement, and interpretation of the natural and cultural resources of Fort Matanzas, while also protecting state and federally listed species and their habitat. We support the Preferred Alternative and provide the following additional recommendations to aide in GMP implementation.

Future Studies and Implementation Plans

Fire Management Plan

The GMP/EIS identifies the need for more detailed studies and plans necessary for implementation, including the need for a fire management plan. The NPS requires all parks with vegetation that will sustain fire (such as coastal scrub) to have a fire management plan. The FWC supports this effort and encourages Fort Matanzas staff to partner with other agencies, such as the Florida Forest Service, St. Johns County, Anastasia State Park, Merritt Island National Wildlife Refuge, Canaveral National Seashore, and Guana Tolomato Matanzas National Estuarine Research Reserve, for assistance in managing the dune systems within Fort Matanzas.

Alternative mechanical management techniques could result in soil disturbance or impact wildlife habitat by affecting the stability of the coastal scrub and dune systems. In general, prescribed burning improves the herbaceous species coverage of habitats and would reduce the likelihood that the coastal scrub would succeed into a coastal hammock. In addition, a number of wildlife species [e.g., the gopher tortoise (*Gopherus polyphemus*; State-listed Threatened species) and the Anastasia Island beach mouse (*Peromyscus polionotus phasma*; Federally listed Endangered species)] are dependent upon the coastal scrub and dunes and could benefit from prescribed fire management.

Resource Stewardship Strategy

Fort Matanzas and the nearby Anastasia State Park are believed to be the only two sites in Florida currently considered viable to support long-term populations of the Anastasia Island beach mouse (*Peromyscus polionotus phasma*; Federally Endangered) (Frank and Humphrey 1996; Humphrey 1987; Humphrey 1992). Additionally, the Fort Matanzas beach includes important nesting habitat for least terns (*Sterna antillarum*; State-listed Threatened species) and other beach-nesting birds. We encourage Park staff to continue surveying and monitoring these species populations in Fort Matanzas. Also, continued efforts to control nuisance, exotic and predatory species will greatly benefit these habitats and associated endemic wildlife species.

Prior to any disturbance of natural habitat for the proposed expansion of parking areas or for enhancements to recreational or other facilities, we recommend that surveys be conducted to determine the abundance of beach mice at those sites and for other listed wildlife species. If take of listed wildlife cannot be avoided, please contact FWC to discuss minimization, mitigation or permitting alternatives.

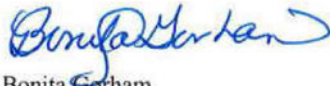
Critical Wildlife Area Designation

FWC staff recommends that the GMP support FWC's re-establishment of the Matanzas Inlet CWA, with revised and expanded boundaries within Fort Matanzas. The current boundaries of the CWA limit management options and the ability to protect beach mice, gopher tortoises, least terns and other beach-nesting birds. Revised boundaries could encompass a larger portion of the park and the naturally shifting distributions of listed species and their habitats. Within CWA boundaries, we suggest that public access be restricted in posted portions of the CWA; such posting efforts could be coordinated with NPS staff. We also recommend that beach mouse habitat within dunes and coastal scrub be posted year-round. Shorebird and seabird nesting areas should continue to be posted seasonally (April – August) as is currently practiced. Additionally, the re-establishment of the CWA allows FWC law enforcement staff to better assist NPS staff and local law enforcement, leading to more effective protection measures for natural resources at Fort Matanzas.

FWC staff finds the proposed draft General Management Plan/Environmental Impact Statement for Fort Matanzas National Monument consistent with our authorities under Chapter 379, Florida Statutes. We appreciate the opportunity to continue to work with Fort Matanzas staff on the formulation of future management practices, wildlife surveys, and research opportunities. If you need any further assistance, please do not hesitate to

contact Jane Chabre either by phone (850) 410-5367 or at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Laura DiGruttolo at (386) 758-0525 or by email at Laura.Digruttolo@MyFWC.com.

Sincerely,



Bonita Gorham
Land Use Planning Program Administrator
Office of Conservation Planning Services

bg/jg/ld

ENV 1-2-2

Fort Matanzas National Monument Draft GMP – EIS_16430_081612

cc: David Libman, GMP Project Leader
National Park Service
Southeast Regional Office
100 Alabama Street, 1924 Bldg.
Atlanta, GA 30303
David_libman@nps.gov

Gordie Wilson, Superintendent
Fort Matanzas National Monument
8635 A1A South
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References:

- Frank, P.A. and S.R. Humphrey. 1996. Populations, habitat requirements, and management of the endemic Anastasia Island beach mouse (*Peromyscus polionotus phasma*), emphasizing the potential threat of exotic house mice (*Mus musculus*). Florida Game and Freshwater Fish Commission Nongame Project Report NG88-001. 46 pp.
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FLORIDA DEPARTMENT OF STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

Mr. David Libman
National Park Service
Southeast Regional Office
100 Alabama Street, 1924 Bldg.
Atlanta, GA 30303

RECEIVED

July 12, 2012

JUL 18 2012

DEP Office of
Intergovernmental Programs

Re: SHPO Project #: 2012-3148/ Received: July 6, 2012
National Park Service - Draft General Management Plan and Environmental Impact Statement
for Matanzas National Monument
St. Johns County

Dear Mr. Libman:

Our office reviewed the referenced project for possible impact to historic properties listed, or eligible for listing, in the National Register of Historic Places, or otherwise of historical, architectural or archaeological value. The review was conducted in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended and 36 CFR Part 800: Protection of Historic Properties.

We have reviewed the Draft General Management Plan and Environmental Impact Statement for Matanzas National Monument. We note that several historic resources are recorded within the park, and other unrecorded resources may be present. We concur with the planning of management actions as outlined in Alternative B. However, cultural resource surveys will be necessary prior to any new construction or excavation on park lands and such projects will require review by this office. We look forward to further consultation as individual projects arise.

For any questions concerning our comments, please contact Deena Woodward, Historic Sites Specialist at 850.245.6333, or by electronic mail at deena.woodward@dos.myflorida.com. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,

Laura A. Kammerer
Deputy State Historic Preservation Officer
For Review and Compliance

Pc: Lauren Milligan, Florida State Clearinghouse/SAI #: FL201207116294C/SHPO #: 2012-3193



DIVISION OF HISTORICAL RESOURCES
R. A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250
Telephone: 850.245.6333 • Facsimile: 850.245.6436 • www.flheritage.com
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August 10, 2012

Lauren P. Milligan
Florida State Clearinghouse
Florida Department of Environmental Protection
3900 Commonwealth Boulevard, MS 47
Tallahassee, Florida 32399-3000

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AUG 20 2012

DEP Office of
Intergov't Programs

SAI # FL201207116294C
NEFRC # FSC-12-0001

Project Description: National Parks Service – Draft General Management Plan/Environmental Impact Statement for Fort Matanzas National Monument – St. Johns County, Florida.

Attn: Florida State Clearinghouse

Pursuant to the provisions of Presidential Executive Order 12372, Governor's Executive Order 95-359 and Chapter 29E-6 Florida Administrative Code, the staff of the Northeast Florida Regional Council (NEFRC) reviewed the above listed Draft Plan/EIS. The Draft Plan/EIS was also reviewed based on the NEFRC Strategic Regional Policy Plan, and it was found to be consistent with the goals and policies.

All the best,

Eric B. Anderson, Regional Planner
Intergovernmental Coordination & Review
Northeast Florida Regional Council



FLORIDA DEPARTMENT of STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

Mr. David Libman
National Park Service
Southeast Regional Office
100 Alabama Street, 1924 Bldg.
Atlanta, GA 30303

July 12, 2012

Re: SHPO Project #: 2012-3148/ Received: July 6, 2012
National Park Service - Draft General Management Plan and Environmental Impact Statement
for Matanzas National Monument
St. Johns County

Dear Mr. Libman:

Our office reviewed the referenced project for possible impact to historic properties listed, or eligible for listing, in the National Register of Historic Places, or otherwise of historical, architectural or archaeological value. The review was conducted in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended and 36 CFR Part 800: Protection of Historic Properties.

We have reviewed the Draft General Management Plan and Environmental Impact Statement for Matanzas National Monument. We note that several historic resources are recorded within the park, and other unrecorded resources may be present. We concur with the planning of management actions as outlined in Alternative B. However, cultural resource surveys will be necessary prior to any new construction or excavation on park lands and such projects will require review by this office. We look forward to further consultation as individual projects arise.

For any questions concerning our comments, please contact Deena Woodward, Historic Sites Specialist at 850.245.6333, or by electronic mail at deena.woodward@dos.myflorida.com. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,

Laura A. Kammerer
Deputy State Historic Preservation Officer
For Review and Compliance

Pc: Lauren Milligan, Florida State Clearinghouse/SAI #: FL201207116294C/SHPO #: 2012-3193



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