

## **5.4 APPENDIX C: RELEVANT CORRESPONDENCE**

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Williams, Jolene <jolene\_williams@nps.gov>

## comments pertaining to PKBM and coastal dune habitat impacts at Johnson Beach

9 messages

Yanchis, Kristi <kristi\_yanchis@fws.gov>

Thu, Nov 5, 2015 at 12:09 AM

To: Jolene Williams <jolene\_williams@nps.gov>, Cassity Bromley <cassity\_bromley@nps.gov>, Alexa.Miles@parsons.com

Hi Jolene-

Here are the general themes we advocate for are:

1. less direct impacts to the coastal dune ecosystem (such as parking lots and turn around).
2. less indirect impacts to the coastal dune ecosystem (such as trampling, trash, noise, presence etc of people).
3. we see dune walkovers as a conservation measure, but should funnel people all the way from parking/road to open beach to avoid the fan-out effect that alters habitat adjacent to the walkovers.

I like that Alt 5 limits the direct impacts to an area adjacent to other impacts. However, I think it could be valuable to keep that existing scrub habitat on the west and north sides of the parking lot. Focusing the expansion only to the east while keeping the same buffer of scrub to the north between new parking and road. I did see a PKBM come from that habitat between the road and main parking area into the main parking area. Jumped the curb like it was nothing. Not sure if looking for food or what. Also, those little islands within the existing parking lot could be paved to incorporate parking, as they are likely too small and fragmented to provide a north-south connection for PKBM. However, if the new parking area to the east were to attempt to avoid the immediate dunes on that side and leave an intact wide enough north-south strip between the old and new parking that could be beneficial. This is where micro-siting of the new parking area could come into play and better advice could be provided while in the field looking at exact conditions. As for the indirect impacts associated with this alternative, 150 new spots off the main area is still a lot, but less than currently allowed with roadside parking (185). While we would like to see a larger reduction in spots to alleviate the pressure by the sheer number of people, we do understand the need for these spots. Rather than focusing on the number of spots, maybe that can serve as an estimate but the micro-siting needed to avoid specific habitat features should be considered a priority over number of spots. It seems as though it is somewhat acceptable to the park to remove the 185 roadside spots and only add 60 spots with alternative 4. By turning the road into a multi-use trail, you would avoid some of the constant maintenance and allow the habitat to behave more naturally. We would want to ensure that people are made to use the dune walkovers that will be created. I believe there is a push to remove the post and rope that is currently intended to prevent human access all along the road. If that is the case, some adaptive management options may be needed to address that unknown impact of how many people will continue to jump the dune if no barrier. The intent of the project that we value is the natural restoration of that roadside habitat when human encroachment is removed. Similar to what is apparent at the last half mile where no parking is permitted. This alternative is the most compatible with PKBM and their habitat as it removes road traffic from a majority of the habitat, uses conservation measures such as walkovers to funnel people over the habitat, focuses additional impacts to the area that is already the most impacted.

On paper, Alt 2 appears to have some decent features as well in that it attempts to remove the indirect human impacts to the habitat by eliminating dune walkovers throughout the middle portion of the beach

and focusing the majority of people at the expanded main parking area and a smaller subset of people at the smaller parking area and turn around. I do think this option will be difficult to enforce as the road will still be open and people will still attempt to park or drop people off along the road to hop over the dune to the beach. Additionally, boaters from the bayside will still visit and cross over the entire north-south spans of habitat. And the number of spots proposed is greater than what the park currently has, thus increasing people and the indirect effects to the habitat and PKBM. Therefore I think more issues are likely to arise from this alternative.

Alt 3 is extremely fragmenting to the habitat with direct and indirect effects. Plus it has a higher number of new spots compared to Alt 4. This alternative is the least favorable due to the higher amount of impacts to PKBM and their habitat.

Alt 4 also fragments the habitat but less than Alt 3. The good thing about this alternative is that it allows for only 60 new spots.

It doesn't appear that there will be any significant impacts to sea turtles with any of these options other than the indirect effects from an increase in people on the open beach.

One thing that is unclear for all these alternatives is the extent of the additional driving lane and station at the entrance. There is some high quality scrub habitat in that area and I would like to have a better understanding of where this feature will go. Also, the no action alternative mentioned that beach camping would continue. The other options did not mention beach camping. I would like to know how that is incorporated (or eliminated) in the other alternatives. We do have some concerns related to beach camping as bonfires could potentially affect turtles during nesting season and beach mice year round (depending on placement). Also, the campers try to tuck away in between the dunes which is in the middle of beach mouse habitat as well as shorebird nesting/resting habitat. However, I am uncertain as to the number of campers and time of year this occurs, therefore unable to address if the concerns are significant impacts or not.

These comments are being provided to suffice your NEPA requirements and do focus on what would be our concerns as it relates to Section 7 of the ESA, however, we would prefer to consult on Section 7 after an alternative is selected and we can truly assess the actual impacts associated with the actual project. At that time you can make a determination of how the project may affect Federal listed species. We will assist you in developing your project along the way via technical assistance if you would like. This will allow for up front conversations regarding concerns, solutions, etc. as the project is formally developed.

Also I typically would have coordinated with FWC regarding shorebirds to see if our comments are consistent. However I did not have time and I know you have received their comments already. As far as the federally listed shorebirds (piping plover and red knot) are concerned, I did not have a chance to get input from our shorebird biologist, and I am not sure as to the extent of either of those species in the project area. I can provide a follow up if I hear of significant concerns.

Thanks. If you need clarification on any of my comments, please let me know.

—

Kristi Yanchis  
U.S. Fish and Wildlife Service  
Panama City Field Office  
1601 Balboa Ave.  
Panama City, FL 32405



THE  
MUSCOGEE (CREEK) NATION

GEORGE TIGER  
PRINCIPAL CHIEF

LOUIS HICKS  
SECOND CHIEF

August 19, 2015

Daniel Brown  
Perdido Key/Johnson Beach EA  
Gulf Islands National Seashore  
1801 Gulf Breeze Parkway  
Gulf Breeze, Florida 32563

RE: Perdido Key/Johnson Beach Environmental Assessment Scoping Brochure

Dear Mr. Brown,

Thank you for contacting the Muscogee (Creek) Nation Cultural Preservation Office concerning the above referenced project.

We have reviewed the brochure and are interested in reviewing the Environmental Assessment, once it is completed, on improving the barrier island habitat and visitor access to the Perdido Key/Johnson Beach area. If there are any additional updates on any of this, we request to be notified.

Should further information or comment be needed, please do not hesitate to contact me at (918) 732-7852 or by email at [lwendt@mcn-nsn.gov](mailto:lwendt@mcn-nsn.gov).

Thank you,

LeeAnne Wendt  
Tribal Archaeologist  
Muscogee (Creek) Nation  
Cultural Preservation Department  
P.O. Box 580, Okmulgee, OK 74447



## Florida Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

November 5, 2015

Ms. Jolene Williams  
Environmental Protection Specialist  
Gulf Islands National Seashore  
3500 Park Road  
Ocean Springs, MS 39564

RE: National Park Service - Scoping Notice - Improve Visitor Access and Barrier Island  
Habitat at the Perdido Key/Johnson Beach Area of Gulf Islands National Seashore -  
Escambia County, Florida  
SAI # FL201509217440

Dear Ms. Williams:

The Florida State Clearinghouse has coordinated a review of the subject Draft Environmental Assessment (EA) under the following authorities: Presidential Executive Order 12372; Section 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.

Florida Fish and Wildlife Conservation Commission (FWC), National Park Service, and U.S. Fish and Wildlife Service staff met on-site during the spring of 2015 to discuss the proposed project alternatives. In general, replacing the dune crossovers and boardwalks in their current location is preferred since it would minimize habitat disturbance while incorporating improved designs. FWC staff recommend that the roadside dune sand fencing be used to prevent the public from accessing dune habitat, reduce sand migration, and assist in restoring dune habitat. FWC also recommend that all boardwalks be posted with "no pets" signage to prevent disturbance of shorebird and sea turtle nesting, and to reduce beach mice predation. To further preclude predation on shorebirds and sea turtles by other wildlife, trash receptacles should be wildlife friendly to prevent attracting raccoons, opossums, feral cats, laughing gulls, and crows. Finally, it is recommend all work be conducted outside of shorebird and sea turtle nesting seasons and comply with accepted shorebird and sea turtle permitting requirements. Alternative specific comments can be found in the attached FWC letter dated 10/26/2015. We appreciate the opportunity to provide comments during the scoping process and we look forward to providing technical assistance throughout the project scoping, design, and implementation. If you have specific technical questions regarding the content of this letter, please contact Theodore Hoehn at (850)488-8792 or by email at [ted.hoehn@MyFWC.com](mailto:ted.hoehn@MyFWC.com).

Ms. Jolene Williams  
FL201509217440  
Page 2 of 2  
November 5, 2015

Based on the information contained in the Draft EA and the enclosed agency comments, the state has determined that, at this stage, the proposed activities are consistent with the Florida Coastal Management Program (FCMP). To ensure the project's continued consistency with the FCMP, the concerns identified by the FWC 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 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*.

Thank you for the opportunity to review the draft document. Should you have any questions regarding this letter, please don't hesitate to contact me at [Chris.Stahl@dep.state.fl.us](mailto:Chris.Stahl@dep.state.fl.us) or (850) 245-2169.

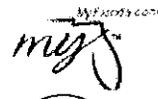
Yours sincerely,



Chris Stahl, Coordinator  
Florida State Clearinghouse  
Office of Intergovernmental Programs

Enclosure

cc: Scott Sanders, FWC



# Florida

Department of Environmental Protection

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Categories

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<b>Project Information</b>	
<b>Project:</b>	FL201509217440
<b>Comments Due:</b>	10/26/2015
<b>Letter Due:</b>	11/05/2015
<b>Description:</b>	NATIONAL PARK SERVICE - SCOPING NOTICE - IMPROVE VISITOR ACCESS AND BARRIER ISLAND HABITAT AT THE PERDIDO KEY/JOHNSON BEACH AREA OF GULF ISLANDS NATIONAL SEASHORE - ESCAMBIA COUNTY, FLORIDA.
<b>Keywords:</b>	NPS - ACCESS/HABITAT PERDIDO KEY/JOHNSON BEACH, GULF ISLANDS SEASHORE - ESCAMBIA
<b>CFDA #:</b>	15.916
<b>Agency Comments:</b>	
<b>FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION</b>	
FWC, NPS, and U.S. Fish and Wildlife Service (USFWS) staff met on-site during the spring of 2015 to discuss the proposed project alternatives. In general, replacing the dune crossovers and boardwalks in their current location is preferred since it would minimize habitat disturbance while incorporating improved designs. We recommend that roadside dune sand fencing be used to prevent the public from accessing dune habitat, reduce sand migration, and assist in restoring dune habitat. We also recommend that all boardwalks be posted with "no pets" signage to prevent disturbance of shorebird and sea turtle nesting, and to reduce beach mice predation. To further preclude predation on shorebirds and sea turtles by other wildlife, trash receptacles should be wildlife friendly to prevent attracting raccoons, opossums, feral cats, laughing gulls, and crows. Finally, we recommend all work be conducted outside of shorebird and sea turtle nesting seasons and comply with accepted shorebird and sea turtle permitting requirements. Alternative specific comments can be found in FWC letter dated 10/26/2015.	
<b>WEST FLORIDA RPC - WEST FLORIDA REGIONAL PLANNING COUNCIL</b>	
No Comments	
<b>ESCAMBIA - ESCAMBIA COUNTY</b>	
No Comments	
<b>ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION</b>	
No Comments	
<b>STATE - FLORIDA DEPARTMENT OF STATE</b>	
No Comment	
<b>NORTHWEST FLORIDA WMD - NORTHWEST FLORIDA WATER MANAGEMENT DISTRICT</b>	
No Comments	

For more information or to submit comments, please contact the Clearinghouse Office at:

3900 COMMONWEALTH BOULEVARD, M.S. 47  
TALLAHASSEE, FLORIDA 32399-3000  
TELEPHONE: (850) 245-2170  
FAX: (850) 245-2189

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October 26, 2015

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Chris Stahl  
Interim Clearinghouse Coordinator  
Florida Department of Environmental Protection  
3900 Commonwealth Boulevard, MS 47  
Tallahassee, FL 32399-3000  
[Chris.Stahl@dep.state.fl.us](mailto:Chris.Stahl@dep.state.fl.us)

Re: SAI #FL201509217440, National Park Service, Scoping Notice, Improve Visitor Access and Barrier Island Habitat at the Perdido Key/Johnson Beach Area of Gulf Islands National Seashore, Escambia County, Florida

Dear Mr. Stahl:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed the National Park Service (NPS) Scoping Notice and Alternatives discussion in preparation for a draft Environmental Assessment (DEA) for the above-referenced project. We provide the following comments and recommendations for your consideration in accordance with Chapter 379, Florida Statutes, and in accordance with the Coastal Zone Management Act, Florida's Coastal Management Program.

### Proposed Project

The purpose of this project is to improve barrier island habitat, visitor access, and safety along Johnson Beach Road within the boundaries of the Gulf Islands National Seashore. Existing dune crossovers provide visitor access from the road to the beach, and have been impacted by naturally occurring dune migration and shifting sands, which has rendered some of them unusable. Because of the inaccessible crossovers, visitors are accessing the beach through adjacent dunes, which has impacted the sensitive dune habitat. In addition to protecting the dune habitat, improvements are intended to increase visitor access and reduce wait times to enter the Perdido Key portion of the national seashore. There are five alternatives that have been presented for consideration.

Alternative 1 is the "no action" alternative. For Alternatives 2 through 5, a new asphalt overlay would be applied to Johnson Beach Road, the last half mile of Johnson Beach Road would be converted to a 10-12 foot-wide multi-use trail, an additional driving lane and visitor station would be added at the Perdido Key entrance, and the existing dune crossovers would be removed and replaced as indicated in the following descriptions:

- Alternative 1 - Take no action;
- Alternative 2 - Expand the existing main parking lot with approximately 150 parking spaces, construct a new parking lot at a new turnaround location to include approximately 30-50 parking spaces, install a total of six elevated dune

crossovers to be located at the main parking area, a new smaller parking area, and the existing turnaround;

- Alternative 3 - Establish seven pull-in parking areas (constructed with Bahama rock or shell) along the road corridor that would accommodate approximately 20 parking spaces each for a total of 140 spaces, create a new turnaround at the end of the new driving area, install 12 elevated dune crossovers, including eight to the south and four to the north of the road;
- Alternative 4 - Construct three new small parking lots along the road corridor that would accommodate approximately 20 parking spaces each for a total of 60 spaces and install six elevated dune crossovers including four to the south and two to the north;
- Alternative 5 - Expand the existing main parking lot to add approximately 150 parking spaces, convert Johnson Beach Road to a multi-use trail for bicycles and pedestrian use, eliminate non-emergency vehicle access, and install 11 new, elevated dune crossovers along the road corridor, at the existing parking area, and at the end of the road.

### **Potentially Affected Resources**

The “Information for Planning and Conservation (IPaC) Trust Resource Document” provided with the scoping document provided a comprehensive list of species that may be affected by the proposed project. FWC staff conducted a geographic information system (GIS) analysis of the project area. Based on this analysis, we did not identify any additional species that may occur within the project boundaries.

### **Comments and Recommendations**

#### General Comments

FWC, NPS, and U.S. Fish and Wildlife Service (USFWS) staff met on-site during the spring of 2015 to discuss the proposed project alternatives. In general, replacing the dune crossovers and boardwalks in their current location is preferred since it would minimize habitat disturbance while incorporating improved designs. We recommend that roadside dune sand fencing be used to prevent the public from accessing dune habitat, reduce sand migration, and assist in restoring dune habitat. We also recommend that all boardwalks be posted with “no pets” signage to prevent disturbance of shorebird and sea turtle nesting, and to reduce beach mice predation. To further preclude predation on shorebirds and sea turtles by other wildlife, trash receptacles should be wildlife friendly to prevent attracting raccoons, opossums, feral cats, laughing gulls, and crows. Finally, we recommend all work be conducted outside of shorebird and sea turtle nesting seasons and comply with accepted shorebird and sea turtle permitting requirements.

#### Alternatives

Alternative 1 (no action): Roadside parking has resulted in foot traffic through the dunes at many locations, degraded dune habitat, and disturbance of nesting shorebirds. We agree with the NPS that this alternative has impacted park resources.

Alternative 2: This alternative could have minimal habitat fragmentation for shorebirds and minimal effects upon beach mice if the parking lot on the east end is located away from historic shorebird nesting areas and outside of habitat occupied by beach mice. FWC staff is available to assist in locating the parking lot to minimize impacts to these resources.

Alternative 3: Shorebird nesting occurs along the entire stretch of beach identified in this alternative. Snowy plovers and least terns are most common, although black skimmers have also been documented. This alternative identifies seven parking lots to be located along the existing road, which could impact the shorebird nesting habitat located in this area.

Alternative 4: This alternative proposes locating three small parking lots along the roadway corridor in areas of historic shorebird nesting and use. We recommend the new parking areas be strategically located in areas with the least amount of historic shorebird activity, which should minimize both habitat loss and impacts to state-listed shorebird species. This could allow for increased visitor access while reducing potential impacts to fish and wildlife resources.

Alternative 5: Converting Johnson Beach road to a pedestrian and bike multi-use trail could have a beneficial effect for shorebirds, beach mice, sea turtles, and other wildlife by avoiding the potential habitat loss and fragmentation associated with parking lots. However, this alternative may not allow for an acceptable level of public access and public use.

We appreciate the opportunity to provide comments during the scoping process and we look forward to providing technical assistance throughout the project scoping, design, and implementation. If you need any further assistance, please do not hesitate to contact Jane Chabre either by phone at (850) 410-5367 or at [FWCConservationPlanningServices@MyFWC.com](mailto:FWCConservationPlanningServices@MyFWC.com). If you have specific technical questions regarding the content of this letter, please contact Theodore Hoehn at (850) 488-8792 or by email at [ted.hoehn@MyFWC.com](mailto:ted.hoehn@MyFWC.com).

Sincerely,



Jennifer D. Goff  
Land Use Planning Program Administrator  
Office of Conservation Planning Services

jdg/th  
ENV 1-3-2  
Perdido Key-Johnson Beach Gulf Islands National Seashore EA\_21946\_102615

cc: Ms. Jolene Williams, NPS, [Jolene\\_williams@nps.gov](mailto:Jolene_williams@nps.gov)  
Superintendent Brown, NPS, [daniel\\_r\\_brown@nps.gov](mailto:daniel_r_brown@nps.gov)

**From:** [Getty, Alyse](#)  
**To:** [Getty, Alyse](#)  
**Subject:** SHPO corresp Reconfigure Visitor Parking and Beach Access at Perdido Key / Johnson Beach (48177)  
**Date:** Friday, June 17, 2016 12:48:44 PM  
**Attachments:** [image003.png](#)

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----- Forwarded message -----

**From:** **Ogden, David** <[david\\_ogden@nps.gov](mailto:david_ogden@nps.gov)>  
**Date:** Mon, Apr 11, 2016 at 1:45 PM  
**Subject:** Fwd: PEPC: A Task has been assigned for: Reconfigure Visitor Parking and Beach Access at Perdido Key / Johnson Beach (48177)  
**To:** Jolene Williams <[Jolene\\_Williams@nps.gov](mailto:Jolene_Williams@nps.gov)>

Entered into PEPC just now.  
David P. Ogden, Historian  
Cultural Resources Program Manager  
Gulf Islands National Seashore  
National Park Service  
850-934-2633; Cell: 850-393-7610

"...to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations."

National Park Service Organic Act, 1916

----- Forwarded message -----

**From:** **Berman, Mary G.** <[Mary.Berman@dos.myflorida.com](mailto:Mary.Berman@dos.myflorida.com)>  
**Date:** Mon, Apr 11, 2016 at 1:39 PM  
**Subject:** RE: PEPC: A Task has been assigned for: Reconfigure Visitor Parking and Beach Access at Perdido Key / Johnson Beach (48177)  
**To:** "[david\\_ogden@nps.gov](mailto:david_ogden@nps.gov)" <[david\\_ogden@nps.gov](mailto:david_ogden@nps.gov)>

Good afternoon Mr. Ogden,

Our office concurs with the National Park Service's determination of "no adverse effect" provided that if untested areas will be impacted by project activities, archaeological testing will be conducted prior to subsurface disturbance.

Kind Regards,

Mary Berman

Historic Sites Specialist | Compliance and Review | Bureau of Historic Preservation | Division of Historical Resources | Florida Department of State | 500 South Bronough Street | Tallahassee, Florida 32399 | Email: [Mary.Berman@DOS.MyFlorida.com](mailto:Mary.Berman@DOS.MyFlorida.com) | [850.245.6333](tel:850.245.6333) | [1.800.847.7278](tel:1.800.847.7278) | Fax: [850.245.6439](tel:850.245.6439) |

<http://dos.myflorida.com/historical>[[dos.myflorida.com](http://dos.myflorida.com)]



**From:** [NPS\\_NRSS\\_PEPC@nps.gov](mailto:NPS_NRSS_PEPC@nps.gov) [mailto:[NPS\\_NRSS\\_PEPC@nps.gov](mailto:NPS_NRSS_PEPC@nps.gov)]

**Sent:** Friday, April 01, 2016 10:39 AM

**To:** Berman, Mary G. <[Mary.Berman@dos.myflorida.com](mailto:Mary.Berman@dos.myflorida.com)>

**Subject:** PEPC: A Task has been assigned for: Reconfigure Visitor Parking and Beach Access at Perdido Key / Johnson Beach (48177)

## PEPC

### Planning, Environment and Public Comment (PEPC)

A task has been assigned by 'David P. Ogden' on 04/01/2016 for the following project:

Park: Gulf Islands NS  
Park Code: GUIS  
Park Region: Southeast

Project ID: 48177

Project Title: Reconfigure Visitor Parking and Beach Access at Perdido Key / Johnson Beach

Task assigned to: Mary Berman

Task Description: Please review and advise at your earliest convenience. Thanks!

Task Response: None

Task Due Date: 5/2/2016

You can view the project information in your browser at the following URL:

<https://pepc.nps.gov/tasks.cfm?mode=view&projectId=48177&taskId=54910>[[pepc.nps.gov](https://pepc.nps.gov)]

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NPS June 2016