



## National Parks Conservation Association®

*Protecting Our National Parks for Future Generations®*

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30 September 2009

Big Cypress Planning Team  
National Park Service  
Denver Service Center  
12795 West Alameda Parkway; PO Box 25287  
Denver, CO 80225-9901

RE: GMP for the Addition Lands to Big Cypress National Preserve

Dear Planning Team,

On behalf of the National Parks Conservation Association (NPCA), I am writing to support the only alternative that designates all eligible lands as wilderness – Alternative F of the Big Cypress National Preserve – Addition Draft General Management Plan (GMP) / Wilderness Study / Off-Road Vehicle (ORV) Management Plan / Environmental Impact Statement dated May 2009.

NPCA is a private non-profit advocacy organization dedicated solely to protecting, preserving, and enhancing America's National Park System (NPS) for present and future generations. Founded in 1919, NPCA has over 300,000 members and activists, with over 19,000 members in Florida. Alternative F is the only alternative that designates all of the eligible 111,601 acres of proposed Wilderness, providing the best opportunity to ensure an appropriate level of protection for the Florida Panther, other wildlife and habitat in the Addition Lands.

Full wilderness designation in this area of the Big Cypress is vital to ensure long-term protection of its natural resources, wildlife, and values. NPCA supports the August 7, 2009 letter submitted by the Public Employees for Environmental Responsibility (PEER), particularly with regards to the designation of all eligible lands as wilderness. The Preserve should indeed choose the more conservative management practices for the Addition Lands in order to protect the Florida panther, in line with the precautionary principle. Furthermore, the Preserve provides no valid reason to exclude almost 30,000 acres of wilderness eligible lands from the Preferred Alternative. The only reasoning appears to be the desire of the Preserve to “maximize” ORV access. The Preserve should provide a rationale for denying almost 25% of the eligible lands as wilderness.

The Addition Lands are primary habitat for endangered species such as the Florida Panther and are among the last remaining geographically extensive wild



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areas where visitors can find a natural experience undisturbed by nearby human activities. NPCA does not support ORV use in the Addition Lands based on the concern for the long-term health of the landscape and the ecological integrity of the Preserve. Recreational opportunities should be limited to low-impact activities that are associated with the conservation of natural resources and ecosystem restoration. Big Cypress Addition Lands offer habitat to 120 rare and protected species plants and animals, including 30 animals and 90 plants. The National Park Service is required to preserve and protect these species. NPCA believes that the Addition Lands should be managed to provide primitive, wilderness experience for visitors and preserve an ecologically restored wildland.

The Preserve's Draft GMP fails to adhere to the NPS Management Policies and the precautionary principle in choosing the Preferred Alternative. The document states, "This [preferred] alternative would maximize ORV access provide a moderate amount of wilderness..." (p. 80). By "maximizing" ORV use at the expense of resource protection and wilderness designation, the Preserve has chosen to allow destructive recreational uses to predominate over resource protection in violation of the Organic Act.

Impacts to natural resources, including the endangered Florida Panther and its habitat, from the Preferred Alternative appear to be validated by the expectation of maximizing ORV use. The Draft GMP identifies the environmental consequences of the Preferred Alternative with the following excerpts:

Impacts of these activities on surface water flow would be long-term, moderate, adverse, and mostly localized...impact of these activities on water quality would be long-term, moderate, adverse, and localized...impacts on wetlands...would be long-term, minor to moderate, adverse, and localized...impacts on soils...would be long-term, moderate, adverse, and localized...impact on cypress strands and domes, mixed hardwood swamps, and sloughs...would be long-term, moderate, adverse, and localized...impact on prairies and marshes...would be long-term, minor, adverse, and localized...impact on pinelands...would be long-term, minor, adverse, and localized...impact on hardwood hammocks...would be long-term, minor, adverse, and localized...impacts on exotic/nonnative plants...would be long-term, moderate, adverse, and potentially Addition-wide (pp. 312-324).

While the Preserve asserts that none of the impacts cause "impairment" of resources, cumulatively, these "adverse" impacts are far greater than those in Alternative F and otherwise show how the introduction of ORV use in this area would be a newly introduced negative impact.



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Alternative F is the only alternative that mostly improves or otherwise provides direct ecological benefits to the Addition Lands. More often the listed environmental consequences of Alt. F are listed as “beneficial” and only occasionally “minor, adverse”. One confusing set of conclusions seems to be contradictory. For Prairies and Marshes, the document states, “Impacts...from visitor use would be long-term, negligible, adverse, and localized...from vegetation management would be long-term, minor to moderate, beneficial, and Addition-wide...of trampling of vegetation by non-motorized visitors (i.e., hikers) would be negligible”, however, the conclusion is that “Collectively, the impact on prairies and marshes under Alternative F would be long-term, minor, adverse, and localized” (p. 352). The discrepancy appears to be that of all the impacts together, none of them are minor and adverse, so collectively they cannot be minor and adverse; however, they more likely would be minor and beneficial. The Preserve should revise that final conclusion.

Furthermore, the Preferred Alternative lists negative impacts on the endangered Florida panther that should be further evaluated in order to determine the logic of this choice. The Draft GMP states, “Total human use and disturbance within panther habitat in the Addition would increase substantially relative to the no-action alternative. The impacts from these activities would be long-term, moderate, adverse, and could be Addition-wide” (p. 324). The document continues to state, “The determination of effect under Section 7 of the Endangered Species Act would be *likely to adversely affect*” (emphasis NOT added, p. 326). Despite this conclusion from the U.S. Fish and Wildlife Service, the Preserve contends, “Impairment from actions contained in this alternative would *not likely result* in impairment of the Florida panther in the Addition because habitat conditions would be maintained or enhanced and the NPS would strive to meet the species recovery goals” (emphasis added, p. 326).

The contradiction here is the Preserve already showed environmental conditions would be adverse due to the implementation of this plan, so how is it that “habitat conditions would be maintained or enhanced?” The Preserve should explain how that would occur. The Preserve’s statement that they will “strive to meet the species recovery goals” does not indicate that they will meet them, nor does it explain how they would meet them. Again, these steps should be outlined in this document. Ultimately, however, the best management of this area for the protection and recovery of the endangered Florida panther is to maximize wilderness designation and limit ORV use, as in Alternative F.

NPCA feels that the Park Service has not effectively managed ORV use in the larger Big Cypress National Preserve and therefore, should not introduce ORV use to the Addition Lands. This lack of effective management has negatively affected highly sensitive and increasingly rare habitats within the Preserve.



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Furthermore, without adequate explanation, the Preferred Alternative departs from the rest of the Preserve's management of ORVs. The idea of a phased implementation, different permits for the Addition Lands versus the original Preserve while having a direct connection from the original Preserve to the Addition Lands through the Bear Island unit, and no indication of whether secondary trails would be included or how they would be identified all needs to be better explained. This management plan would likely cause confusion with the ORV community and other visitors.

Since the Preserve was originally created and the Addition Lands were added, the visitorship has increased and diversified, we believe the National Park Service must better accommodate. Whereas in the 1980's there were less than 100,000 people that annually visited the Preserve, recently more than 800,000 visitors enjoy the beauty of this unique treasure. NPCA members and other current and potential visitors to the Preserve have stated their preference for additional non-motorized access opportunities, including ensuring a quiet and peaceful opportunity to enjoy the unique resources of the Big Cypress Basin. Hiking and overnight backpacking will likely increase in this area, reaching a new and expanding eco-tourism market.

The Preferred Alternative lacks any reference to the restoration of natural resources within the Addition Lands. The House and Senate reports on the original Preserve state, "the area included in the preserve...will be managed in a manner which will assure its return to the true wilderness character that once prevailed" (p. 5 House Rep. 93-502; p. 4, Senate Rep. 93-1128). Only Alternative F proposes to remove old roadbeds or other man-made impediments to water flow or natural resource connectivity.

The Preserve needs to take every measure to minimize potential impacts of oil and gas exploration and extraction. Our preferred choice for minimizing these impacts is to continue to pursue the subsurface mineral rights.

NPCA thankfully acknowledges the references to the efforts regarding the restoration of America's Everglades and believes there is an even greater potential of improvement of benefits to the Big Cypress National Preserve than this document indicates.

The work of the U.S. Department of Interior, the U.S. Army Corps of Engineers, the state's South Florida Water Management District, and the Seminole Tribe of Indians of Florida proposes great improvements of water flow and water quality to the northeastern portion of the Addition Lands that should be felt Addition-wide.



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NPCA supports these restoration efforts with the expectation that improved water quality, quantity, timing and distribution will provide long-term benefits to the Big Cypress basin and the Ten Thousand Islands areas. These environmental improvements, already underway on the Seminole Indian Reservation, could be hindered, however, with the introduction of ORV use and impacts in the Addition Lands. The Preserve should reevaluate the impacts of ORV use on surface water movement comparing the current conditions to those with and without increased ORV use in this area.

We appreciate the opportunity to comment on the Big Cypress National Preserve Addition Lands General Management Plan in support of maximizing full wilderness designation as identified in Alternative F. Please don't hesitate to contact us with any questions.

Sincerely,

John Adornato III  
Sun Coast Regional Director