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September 30, 2009

Pedro Ramos, Superintendent
Big Cypress National Preserve
Headquarters
33100 Tamiami Trail East
Ochopee, FL 34141-1000

RE: BCNP Addition Lands Management Plan

Dear Mr. Ramos,

On behalf of Collier County Audubon Society and Audubon of Florida (collectively, Audubon), we write to share comments and recommendations for the Big Cypress National Preserve's (BCNP) Management Plan for the Addition Lands. Audubon has actively participated in the planning process, as well as baseline onsite research in preparation for Comprehensive Everglades Restoration Plan (CERP) restoration implementation in the Addition Lands. Audubon has also spent considerable time meeting with interested parties over the past couple years of planning efforts in an attempt to equitably and objectively weigh the various attributes of a series of alternative management approaches to these 147,000 acres. The May, 2009 draft General Management Plan/Wilderness Study/Off-Road Vehicle Management Plan/Environmental Impact Statement has been reviewed and evaluated with input from Audubon science and policy staff.

It is clear that this is an ecologically significant natural resource on a vast watershed-scale that influences the integrity of adjacent important western Everglades and estuarine landscapes. It is also clear that without the dedication and Herculean efforts of sportsmen and conservation individuals and groups to preserve the Big Cypress from fragmentation, development and degradation, this Preserve would not exist. Audubon recognizes these dual and possibly competing facets of management considerations and obligations for the Addition Lands. With that perspective, we make the following comments and recommendations.

Audubon strongly prefers the management strategies outlined in Alternative F, which emphasizes maximum wilderness designation and forbids Off-road Vehicle (ORV) access to the Addition Lands. However, due to social and ethical obligations to accommodate reasonable and compatible public access opportunities from traditional user groups, including some ORV trails, Audubon recommends a significantly modified version of the Preferred Alternative listed on page 80 of the draft Management Plan. Audubon does recommend considerable acreage of wilderness designation in addition to and including that shown for the Preferred Alternative. In

order to fully address the management and research needs which otherwise might conflict with such a designation (use of chain saws, motorized access, etc.), Audubon strongly recommends establishing a Wilderness Committee, like that for Everglades National Park, to evaluate research and management requests and exemptions. The details of Audubon's recommended modifications to the Preferred Alternative recommendation follow:

1. No ORV trails or use would be permitted south of I-75. These wetlands, including Mullet Slough, are not appropriate for motorized access and would be unsustainable.
2. No ORV trails west of the L-28 Interceptor Canal, out to Jones Grade (approximately the center of the Addition Lands northern tract). This is due to motorized access conflicts with research and monitoring associated with two Everglades/CERP restoration projects planned. Audubon science staff, led by Drs. Jerome Lorenz and Shawn Liston under contract to the Army Corps of Engineers, have been conducting baseline field studies since 2002 in these areas anticipated to be restored. ORV trails east of the L-28 Interceptor Canal, including access at MM51 would not conflict with restoration.
3. Audubon does not support interconnection between ORV trails in the Addition Lands and the trails in the adjacent Bear Island Unit of BCNP. Unsustainable levels of use may occur with such an interconnection.
4. Restoration is necessary for degraded trails and trails being decommissioned. There must also be assurance that all trails, ORV-accessible or not, must not go above or below grade, and must be closely monitored. Attached to this letter is a photograph of a substantially degraded trail located approximately 1 mile west of the L-28 Interceptor Canal which is roughly two feet below grade because of abuse. Whether this trail was intended to be part of the ORV system is not clear, but it is an example of an area which is unsustainable for vehicular access. It is important to note that these below-grade trails serve as vectors for non-indigenous fish and invertebrates to move throughout the system, and are unnatural early-dry season refuges (ecological 'sinks') for the aquatic fauna upon which wading birds depend.
5. Campsites at the Nobles Grade and Jones Grade sites are acceptable due to current impacted statuses.
6. Wetlands must be avoided and geowebbing and rock will only be used as needed for spot treatment of trail degradation.
7. The remainder of proposed ORV and hiking trails and access points on the Preferred Alternative are acceptable.
8. Monitoring is vital to determine unsustainable portions of the trails system that must be deleted or modified, in addition to repair and restoration responses needed. If staffing falls below the ability to adequately monitor public uses, the trails must be closed to motorized use.
9. All Terrain Vehicles (ATV) and other "thrill riders" must be discouraged from access, in the entire BCNP, by advocating other more appropriate locations, such as the Redneck Yacht Club in Charlotte County and other potential sites still under consideration. BCNP and its partners should be required to promote any ORV (including ATV) use as backcountry transportation and not thrills to help dispel current misunderstanding of this amongst BCNP ATV users.
10. A Wilderness Committee should be established, similar to that working for Everglades National Park, which can evaluate requests for exemptions for appropriate management and research needs and activities.

Audubon has strong concern and interest in assuring the management plan for the Addition Lands does not conflict with the needs for the endangered Florida panther, or other imperiled species. However, it is Audubon's opinion that reasonable traditional uses with the constraints

outlined above and within the proposed Draft Management Plan, are compatible with panther habitat. Active human uses will be during daytime hours, predominantly, and the nocturnal panther has shown resilience and tolerance of these uses in other landscapes in which they occur. The study data and information regarding possible aversion behavior by cats in the Bear Island Unit of BCNP do not present a strong enough case to warrant total exclusion of reasonable public access. Audubon also is convinced that the Florida Panther National Wildlife Refuge, adjacent to Bear Island, will provide a sufficient landscape management “control” against which to evaluate the effects of the implemented management plan for the Addition Lands’ panthers. If aversion behavior or other impacts to habitat or cats is observed, management policies must be changed accordingly to eliminate the impacts.

Audubon makes the above recommendations for a significantly modified Preferred Alternative in the hope that this proposed balance between wilderness stewardship, research needs and appropriate compatible public access will further the original intentions to cultivate the ecological and societal benefits of the entire Big Cypress Swamp’s amazing western Everglades landscape, among the grandest on the planet.

Sincerely,

Shawn Liston

Shawn Liston, Ph.D.
Research Manager-Southwest Region, AoF



Bradley Cornell
Southwest Policy Associate, AoF/CCAS



Copyright 2009, Shawn Liston, Ph.D. [composite photograph]
ORV trail SW of L28 (approx. 26°11'50.54"N, 80°54'29.85"W) (9/10/2009)