



Florida Office

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September 30, 2009

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

Dear Planning Team;

On behalf of Defenders of Wildlife I am offering the following comments on the *Big Cypress National Preserve – Addition; Draft General Management Plan/Wilderness Study/Off-Road Vehicle Management Plan/Environmental Impact Statement*, May 2009.

While we find that none of the alternatives in the Draft fully address the Addition lands scientific assessment needs, the direct, indirect and cumulative threats and the near and long term management actions required, and therefore, further work needs to be done to produce a thorough General Management Plan, Defenders supports Alternative F as it most closely meets the mandate of the National Park Service 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 manner and by such means as will leave them unimpaired for the enjoyment of future generations.

Defenders finds:

- Big Cypress National Preserve encompasses a unique and diverse region rich in plant and animal life, distinctive physiogeographic features, and interdependent ecological processes that include many imperiled species and overall a system threatened by global dynamics such as, climate change and sea level rise, local level impacts related to land use decisions and transportation projects and threats from within, such as, the spread of exotic invasive species.
- That Florida and the eastern United States still have a sizeable area of eligible wilderness remaining, 111,601 acres, is an opportunity that must be pursued

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for the ecological health of the system and for the benefit of future generations of people and wildlife.

- NPS Management Policies state NPS will take no actions that would diminish the wilderness eligibility of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed. We caution against any actions contemplated by Big Cypress that would contravene that policy.
- The Addition lands are not totally pristine and include disturbed areas in need of restoration. We find that policies pertaining to wilderness designation provide adequate flexibility to allow land managers to conduct needed restoration and management operations. We note that Alternative F anticipates some use of ORVs by NPS.
- Alternative F prohibits the use of ORVs except for limited NPS purposes. Defenders supports this plan, especially in light of the fact that NPS has still not completed the studies needed in order to make fully informed decisions about management of the resources and recreational activities, such as, studies related to panthers and hydrological processes. Further, Big Cypress lacks adequate staff to properly oversee and enforce an ORV trail system.
- Defenders acknowledges that regulated hunting and fishing conducted in a responsible manner is a legitimate and compatible use of the Addition lands.
- The Florida panther is a critically endangered species for whom the Preserve and Addition are essential core and corridor habitat. More panthers use Big Cypress than use Everglades National Park to the south. This wide roaming animal and other wildlife are being continually pushed to marginal and conflict situations and subjected to human related intrusions; they should have some sizeable refugia of intact habitat in which to conduct their lives.
- The Draft should have delved more thoroughly into the potential for Big Cypress's role in and coordinated work with Everglades restoration.
- The Draft fails to adequately address climate change impacts despite the fact it states "Climate change is perhaps the most far-reaching and irreversible threat the national park system has ever faced." South Florida will be among the most intensely affected regions of the world by climate change and sea level rise. Restoring and maintaining the ecological integrity and resiliency of the Addition lands should be first among the management objectives.

Alternative F is the choice that overall improves and results in beneficial impacts to the Addition lands while providing a range of non-intensive visitor recreational opportunities. The Preferred Alternative yields a long list of adverse impacts on natural resources. We urge NPS to more thoroughly address the management needs of the Addition lands and how they would be carried out with a realistic eye to the staffing and funding foreseeably available.

Thank you for the opportunity to comment. Defenders remains committed to working with NPS and the many people who care deeply about the future of Big Cypress National Preserve and the Addition for the ecological integrity of the resources, the health of wildlife populations, and enjoyment of all.

Sincerely,

Laurie Macdonald
Director, Florida Programs
Defenders of Wildlife