



# FLORIDA WILDLIFE FEDERATION

*Affiliated With National Wildlife Federation*

Manley K. Fuller, III, President  
2545 Blainstone Pines Drive, Tallahassee, FL 32301  
Post Office Box 6870, Tallahassee, FL 32314-6870

Phone: (850) 656-7113  
Fax: (850) 942-4431  
e-mail: wildfed@aol.com  
website: www.fwfonline.org

September 30, 2009

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

Dear Superintendent Ramos,

I am Manley Fuller, President of the Florida Wildlife Federation, and am providing comments on the proposed management plan for the Big Cypress National Preserve Addition Lands and the accompanying wilderness study. The Florida Wildlife Federation has approximately 50,000 members and supporters. The Florida Wildlife Federation was a leader in the establishment of the Big Cypress National Preserve in the 1970's and later in the 1980's with the Big Cypress Addition Lands. I presented Florida Wildlife Federation's comments before Congressional Committees in 1987 and worked closely with then U. S. Senator Lawton Chiles and his staff as a Preserve advocate.

The Florida Wildlife Federation has been engaged in a number of Preserve management issues on a continual basis for many years. Florida Wildlife Federation Director Franklin Adams and I both serve on the Preserve's Off-road Vehicle Advisory Committee. My comments are general in nature and Franklin Adams will be providing more detailed commentary under separate cover.

The Florida Wildlife Federation is a strong proponent of panther recovery and ecological restoration, control of exotic plants and animals, supports ethical and sustainable outdoor recreation including managed hunting within the Preserve and the Addition Lands. The Florida Wildlife Federation recognizes that future recreational use of Off-road vehicles will be confined to designated trails. We also recognize that it will be necessary for the Preserve's management vehicles to go off trail when necessary for management, emergency activities, research or law enforcement.

The Florida Wildlife Federation believes that the natural resource values of the Addition Lands are very high. We believe that, to maintain and restore the full range of natural values to previously disturbed areas (i.e. old agricultural fields), active management primarily through the use of prescribed fire is a requirement. Florida, particularly South Florida, is subject to colonization and expansion of a number of exotic plants and animals. Exotic control and hopefully eradication is an ongoing challenge throughout the South Florida landscape. We believe that no future land use classification including potential wilderness designation, should inhibit the regular use of fire as a management tool nor restrict appropriate tools including use of mechanized equipment.

We recognize that there are provisions under the wilderness classification where management exceptions can be carved out, but formal wilderness designation in the Preserve will complicate necessary management decision-making and implementation. We believe that the entire Preserve complex (Current and Addition Lands) requires active resource management, sometimes requiring mechanized equipment not normally allowed in wilderness. We believe that the vast majority of the Preserve and Addition Lands will be managed as “de facto wilderness” through the designated trail system. We believe that it is better to retain the full range of management options necessary to maintain the Preserve’s and Addition Lands’ natural values through protective but non wilderness designation. If some areas are ultimately designated wilderness, it is critical that provisions for active management be made up front to minimize the Park Service management being constrained for bureaucratic reasons when there are serious time-sensitive management decisions that need to be made.

In terms of recreational access, we believe that the suitable existing trail and dirt road network within the Preserve can provide for managed vehicular and foot access, if properly maintained. Trails should be at grade and designed so as not to interfere with natural sheet flows.

We believe it is critical not to allow mud buggers or rally type of Off-road vehicles to utilize Preserve or Addition Lands. All Off-road vehicle use must be subject to permits, educational training, using designated trails or pull over sites only, use of approved access sites only, and speed restrictions, i.e. low geared vehicles operating at 15 m.p.h. or less. Enforcement of the rules, education of the operators, control of points of ingress and egress, and trail signage are all necessary for proper management of the public’s use of Off-road vehicles. We believe that the work of the Off-road vehicle advisory committee should be expanded to include assistance in the implementation of the approved management plan.

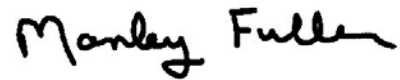
We also believe that a longer system of foot only trails should be maintained and designated in the Addition Lands. These foot trails also require maintenance by manual labor but periodically may require mechanical clearing to stay open.

In closing, the Florida Wildlife Federation regrets the long delays which have taken place in establishing public access as specified in the Addition Lands Act of 1988 since the federal government formally acquired the Addition Lands in 1996. We would like to have the Park Service investigate potential trail reconnections on sustainable old trails between the Preserve and the Addition Lands as eventually these units’ management plans will be merged. We do appreciate the vigor with which the Park Service has approached these matters in recent years and the current degree of cooperation with the state of Florida, particularly the Florida Fish and Wildlife Conservation Commission as well as other Florida agencies.

We appreciate the work of the Park Service staff in moving the planning process forward. Whatever the ultimate land use decisions are under the record of decision and

subsequent Congressional actions, it is critical to maintain the ability and flexibility to manage this national gem in a manner that protects its natural resource values while allowing the public to enjoy a variety of sustainable and traditional types of resource-based outdoor recreation on both the Preserve and the Addition Lands. We hope that the implementation of this plan can proceed as expeditiously as possible

Sincerely,

A handwritten signature in black ink that reads "Manley Fuller". The script is cursive and fluid, with the first name "Manley" and the last name "Fuller" clearly distinguishable.

Manley K. Fuller  
President  
Florida Wildlife Federation