



TROPICAL AUDUBON SOCIETY, INC.

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"THE VOICE OF CONSERVATION IN SOUTH FLORIDA ..."

September 28, 2009

Big Cypress National Preserve
Addition General Management Plan
National Park Service
Denver Service Center – Planning
P.O. Box 25287
Denver, Co 80225

**RE: BIG CYPRESS NATIONAL PRESERVE – ADDITION, DRAFT GENERAL
MANAGEMENT PLAN/WILDERNESS STUDY, OFF-ROAD VEHICLE
MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT
(collectively, the "DRAFT PLAN")**

Dear Sirs/Ladies:

On behalf of the Tropical Audubon Society, I am writing in support of Alternative F of the Draft Plan. We believe it is the actual "environmentally preferred" alternative, notwithstanding your planning team's determination to the contrary. For a side-by-side comparison of the Alternative F with the Preferred Alternative, please see Attachment A..

Generally, we are concerned about the relative *de minimis* impacts you have routinely attributed to the proposed off road vehicle ("ORV") use in the Addition, as contemplated by the Preferred Alternative. See the discussion of the Preferred Alternative in Ch. 4 "Environmental Consequences" at 312-44. For example, there is one conditional sentence devoted to impact of ORVs on the soils of the Addition (see Draft Plan at 316); this is remarkable. We find there to be recurring underestimates throughout the aforementioned chapter of the Draft Plan as to the anticipated impacts, damage and costs resulting from the proposed ORV operation.

We also have the following observations with respect to the Draft Plan:

- Alternative F is clearly more consistent than the Preferred Alternative with the applicable statutory legislation, particularly P.L. 99-440, as amended by P.L. 100-301.

• Alternative F is also consistent with any wilderness designation within the Addition; the Preferred Alternative is not: ORV operation in any form is anathema to wilderness. Besides the destruction of natural resources which is inevitable, the noise production from potentially hundreds of ORVs over @140 miles of ORV trails (see Map 5 at 83 of Draft Plan) precludes any notion of wilderness for miles around. See Draft Plan at 206-10 (esp. at 208). We are nonplussed as to how any recreational ORV operation (or similar activity) could be tolerated in a "wilderness." Simply put, notwithstanding your stated "adherence" to the requirements of *The Wilderness Act* (at 64 of Draft Plan) we believe the Preferred Alternative is not consistent therewith.

• The encouragement of so-called "traditional uses," while recognized by P.L. 100-301, should not go so far as to interfere with good stewardship. More important, Alternative F is clearly more consistent with the ideals of *The Redwood Act* (16 U.S.C. §1 a-1 (2009)) which is based on the following premise: If "a conflict between visitor use . . . and the protection of resources should occur . . . the intent of Congress is to favor resource protection." As quoted in the Draft Plan at 15. The Preferred Alternative does not satisfy this mandate. The use of swamp buggies and other, similar motorized vehicles (certainly to the extent of 700 ORVs and 140 miles of ORV trails) is simply not sustainable in any sense of the word. Further, we believe the amount of management resources that will be required to "continuously evaluate" (at 97 of Draft plan), regulate and police (to ensure that they stay "on the road") the proposed ORV use in the Addition (see generally, the Draft Plan at 97-111) not to mention the costs to repair or mitigate the results of the inappropriate actions of just a few, has been severely under-estimated in the Draft Plan. Cf. Table 6 at 91 of the Draft Plan.

• The Preferred Alternative benefits a very few, while denying the actual and potential passive enjoyment of the Addition to many. We note that the Preferred Alternative (as is the case with Alternative B) seems to be written for ORV use (and to a lesser extent hunting/frogging) with relatively minimal attention to non-destructive uses. Compare for example the depth and breadth of the discussion of the various recreational activities in Chapter 4 of the Draft Plan at 198-206: ORV use and hunting dominate the discussion almost to the exclusion of true passive (less destructive) uses. This bias appears throughout the document, which belies the fact that the spirit of the document is not consistent with your statutory mandates.

• The Preferred Alternative is inconsistent with the protection and restoration of the Florida panther, Red-cockaded woodpecker and Wood stork (all federally-endangered species). See Draft Plan at 170-74 and 179-85, and note the Draft Plan's "conclusion" re the Florida panther at 326. We believe allowing ORV use in the Addition would be tantamount to an unlawful "taking" under the federal Endangered Species Act.

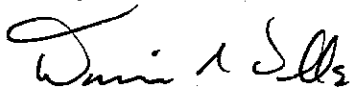
• The Preferred Alternative encourages the wasteful consumption of energy and an expanded "carbon footprint." This is clearly inconsistent with the Department of Interior's efforts to recognize and discourage anthropomorphic activities which, among other things, can only exacerbate climate change.

• The Preferred Alternative is no more than Alternative B in "sheep's clothing"; unfortunately, there was not sufficient diversity in the original alternatives (discussed below).

* * * *

While we appreciate the planning team's long-standing efforts in this regard, we believe the original alternatives (Alternatives A-F) did not offer a "fair and balanced" selection which could have appealed to a greater number of all residents of South Florida. If possible, we strongly encourage you to "go back to the drawing board;" if not, then the Alternative F is the only alternative consistent with both your commonsensical and statutory charge of "good stewardship," especially with respect to future generations.

Sincerely,



Dennis Olle
Vice President
Tropical Audubon Society

Cc: Laura Reynolds
Jose Francisco Barros

Big Cypress National Preserve

9/8/09

NATURAL RESOURCES	PREFERRED ALTERNATIVE	ALTERNATIVE F
Surface Water Flow	Moderate - adverse	Minor - moderate beneficial
Water Quality	Moderate - adverse	Minor - adverse
Wetlands	Moderate - adverse	Minor - adverse
Floodplains	No Impact	Minor - beneficial
Soils	Moderate - adverse	Minor - adverse
Vegetation		
<i>Cypress Strands and Domes, Mixed Hardwood Swamps, and Sloughs</i>	Moderate - adverse	Minor - adverse
<i>Prairies and Marshes</i>	Minor - adverse	Minor - adverse
<i>Mangrove Forests</i>	Minor - adverse	No impact
<i>Pinelands</i>	Moderate - adverse	Minor - adverse
<i>Hardwood Hammocks</i>	Moderate - minor adverse	Minor - adverse
<i>Exotic/Non-native Plants</i>	Moderate - adverse	Minor - adverse
Federal Threatened and Endangered Species	Moderate - adverse	Minor - adverse
<i>Florida Panther</i>	Likely to adversely affect	Not likely to adversely affect
<i>West Indian Manatee</i>	Not likely to adversely affect	Not likely to adversely affect
<i>Red-Cockaded Woodpecker</i>	Likely to adversely affect	Not likely to adversely affect
<i>Wood Stork</i>	Not likely to adversely affect	Not likely to adversely affect
Major Games Species	Moderate - adverse	Minor - adverse
Wilderness Resources and Value	Moderate beneficial	Major beneficial

CULTURAL RESOURCES	PREFERRED ALTERNATIVE	ALTERNATIVE F
Archeological Resources	Moderate - adverse	No impact
Ethnographic Resources	No impairment	No impairment

VISITOR USE AND EXPERIENCE	PREFERRED ALTERNATIVE	ALTERNATIVE F
	Moderate beneficial	Minor beneficial

SOCIOECONOMIC ENVIRONMENT	PREFERRED ALTERNATIVE	ALTERNATIVE F
Local Economy	Localized, negligible	Localized, negligible

NPS OPERATIONS AND MANAGEMENT	PREFERRED ALTERNATIVE	ALTERNATIVE F
NPS Operations and Management	Moderate - adverse	Minor - moderate beneficial