



P.O. Box 30211  
Fort Lauderdale, FL 33303

September 27, 2015

Superintendent Pedro Ramos  
Everglades National Park  
40001 State Road 93363  
Homestead, FL 33034

Dear Superintendent Ramos:

Thank you for the recent release of the Final General Management Plan/East Everglades Wilderness Study/Final Environmental Impact Statement for Everglades National Park. We also thank you for the opportunity to present these comments with regard to the plan.

South Florida Wildlands Association (SFWA) was founded in March of 2010 for the protection of wildlife, wilderness, and wildlife habitat in the Greater Everglades. While we are not currently a membership organization, our work is followed by tens of thousands via social media, emailed action alerts, and frequent coverage in local, state, and national news outlets. As by far the largest intact remnant of the once vast Everglades ecosystem, Everglades National Park and this management plan has been a high priority for SFWA ever since our founding in March of 2010. My personal involvement in this plan predates the founding of SFWA by a number of years.

An excellent little summary of the importance of Everglades National Park can be found in the opening paragraph of its Wikipedia article:

**Everglades National Park is a U.S. National Park in Florida that protects the southern 20 percent of the original Everglades. In the United States, it is the largest tropical wilderness, the largest wilderness of any kind east of the Mississippi River, and is visited on average by one million people each year. It is the third-largest national park in the lower 48 states after Death Valley and Yellowstone. It has been declared an International Biosphere Reserve, a World Heritage Site, and a Wetland of International Importance, one of only three locations in the world to appear on all three lists.**

[https://en.wikipedia.org/wiki/Everglades\\_National\\_Park](https://en.wikipedia.org/wiki/Everglades_National_Park)

Species diversity within the park is also extremely high with numerous federally listed species (20 are listed as “endangered”). Eight plant species are federally listed.

<http://www.nps.gov/ever/learn/nature/techecklist.htm>

All previous legislation and policy regarding National Parks places natural resource protection over and above recreation in NPS units. The current 2006 Department of the Interior Management Policies for the National Park Service is unequivocal on that principle when it states:

“The National Park Service adhered to a number of principles in preparing this 2006 edition of Management Policies. The key principles were that the policies must...ensure that conservation will be predominant when there is a conflict between the protection of resources and their use”

The complete document can be found here:

<http://www.nps.gov/policy/mp2006.pdf>

With that clear mandate – and the incomparable natural resources of the first “biological park” in our nation's history – in mind, SFWA provides the following comments.

**Florida Bay.** Although the final GMP does create poll and troll zones within Florida Bay to allow for damaged areas (the result of power boats running through shallow water) to be protected and hopefully recover, it falls short of what is needed in a number of ways.

First – the 2008 NPS science report - “Patterns of Propeller Scarring of Seagrass in Florida Bay” - should have been relied upon more heavily as the basis for the creation of poll and troll zones. The report found massive amounts of seagrass and substrate damage throughout the Florida Bay sections of Everglades National Park. Water depths of 2.5 feet or less were identified as the depth where damage was (by far) most likely to occur – with seagrass damage also occurring at high levels in water up to 3 feet in depth.

The Florida Bay bottom in Everglades National Park is both National Park (and governed by the protective mandates of the Organic Act of 1916, the park's own enabling legislation, and other laws) as well as designated federal wilderness. The Final GMP leaves much of the shallower areas of the bay – areas where seagrass damage is currently known to take place – unprotected from the impacts of motorized recreation. To fulfill its legislative mandates under the Organic Act, Wilderness Act, Endangered Species Act, and others – a more protective plan should have been chosen by NPS which would still have allowed access (through deeper water channels). Including more of the shallowest parts of the bay in poll and troll zones would have protected, and in time restored, more of the vulnerable parts of a bay which are essential to the vast variety of marine wildlife for which it is habitat. That protection should also have been given more weight than recreational access in the decision-making process.

Robert Johnson, Director of the South Florida Natural Resources Center at Everglades National Park, wrote the following in the forward to the above report:

**This report, “Patterns of Propeller Scarring of Seagrass in Florida Bay,” represents our continuing advancement in Everglades National Park’s ability to perform science-based assessments of the natural resources in Florida Bay. Florida Bay’s submerged aquatic vegetation and bottom communities were defined as federally designated wilderness in 1978, to protect this internationally significant resource. The health of these benthic communities is directly tied to commercially and recreationally important fisheries and the health of the adjacent Florida Keys reef tract. For decades, propeller scarring has been identified as a stressor affecting the park’s vast seagrass resources, but we have been unable to quantify the impacts.**

Those impacts have now been quantified. They should have been better mitigated in the final GMP. The NPS report can be downloaded at this website – and is included in its entirety as a part of this letter:

<http://www.nps.gov/ever/learn/management/upload/Final%20Propeller%20Scar%20Report%20Low%20Res.pdf>

Secondly, with regard to future management of Florida Bay, SFWA believes that the extremely complex pattern of zones NPS has decided to implement in Florida Bay - Pole/Troll, Pole/Troll/Idle, Backcountry (nonmotorized), Frontcountry, Special Protection, Idle Speed–No Wake, etc. - plus unmarked channels - will be a nightmare for NPS to communicate to the boating public and enforce. While we are happy that the education course will be provided and required of boaters– and that should help – it seems that a simpler plan with actual markings on the water – would have gone a long way to achieving the levels of protection desired in Florida Bay.

**East Everglades.** In the park's 100,000 + acre East Everglades Expansion Area, South Florida Wildlands has long urged NPS to fulfill its obligations with regard to the Everglades National Park Protection and Expansion Act of 1989. In all of our previous written comments and in meetings and conversations with former Superintendent Dan Kimball, we have asked NPS to allow for a gentler and less motorized use of the portions of the Expansion Area which include the headwaters of the Shark River Slough (the lifeblood of water throughout the entire park). That would mean limiting the footprint for airboats, putting all airboat use in the Expansion Area (commercial and private) on the required designated trails, creating designated and non-motorized kayak and canoe paddling routes through the entire length of the Shark River Slough in the Expansion, proposing designated wilderness for at least parts of the Shark River Slough in the Expansion, and consolidating the current high levels of commercial airboat operations into fewer operations. All of these suggestions are completely in line with the Expansion Act which required airboat use to be of “limited capacity” and on designated trails only.

While the current crop of commercial airboat operations does ferry a large number of tourists out for a quick peek at the Everglades – it does not provide visitors with the look, sound, and feel of being inside of a National Park. Furthermore, ecological damage is known to occur as a result of airboat activities in terms of impacts on vegetation, substrates, wildlife, hydrology, and possibly water quality. The process of acquiring the properties (as required by the Expansion Act) and entering into concession contracts would clearly analyze those impacts and help determine appropriate levels of use. Unfortunately those contracts – plus the designation of trails and identifying private owners of record using the Expansion Area as of the date of the 1989 Act – have so far not happened in the 26 years since the Expansion Act was signed. The Final GMP likewise lays out no timetable for those measures to be taken.

It is high time for NPS to move vigorously in the direction of making this essential part of Everglades National Park – acquired for the ecological and hydrological protection and restoration of the entire park – and the section closest to the South Florida Metropolitan Area – begin to take on the normal values of a National Park. Currently it more closely resembles an amusement park. And while NPS has stressed the increased visitation as a result of commercial airboat rides – SFWA believes NPS is vastly underestimating the visitation which would occur with quiet and safe paddling routes through the wet portions of the Expansion Area that would be readily accessible to a large urban population. User conflict would diminish with less airboat use – and the ecology of the area would improve.

We look forward to more discussion on these and many other topics with regard to Everglades National Park. As stated above, we are happy that the education component of boating in Florida Bay – long championed by our colleagues at the National Parks Conservation Association (NPCA) has been adopted. And we look forward to utilizing the proposed non-motorized paddling route in season along the “Wilderness Waterway.” Thank you for adding that to the Final General Management Plan.

Best regards,

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