

# *Everglades National Park*

## *A Discussion Document*



*“In-Process”*  
*General Management Plan*  
*And*  
*Environmental Impact Statement*

*That Will Guide Park Management the Next 15-20 Years*

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### Section 1. Background

As pressures and bureaucracy continue to intensify within National Parks, leadership struggles to keep their organizations focused on critical activities while ensuring their cost structure remain within tight budgets. Additionally, most, not all, National Parks are mandated to keep the Park available to “The People” while also preserving and protecting the resources. These objectives can be in direct conflict.

The Everglades National Park (ENP), which is led by Superintendent Maureen Finnerty, certainly feels the conflict. Ms. Finnerty is currently mostly focused on the multi-billion dollar restoration of the Everglades, under the leadership of the Army Corps of Engineers, but now she now finds it is time for the ENP to craft a new 15-20 year General Management Plan. This effort will take an estimated 4-5 years. Ms. Finnerty is also the Superintendent of the Dry Tortugas National Park. That park completed its last General Management Plan in July 2001. The plan was recommended by Ms. Finnerty and approved by Mr. Jerry Belson, Southeast Regional Director, National Park Service. However, it should be noted the plan was developed under the leadership of her predecessor, Superintendent Richard Ring.

Additionally, Biscayne National Park is over one year into developing its new General Management Plan under the leadership of Superintendent Linda Canzanelli. Finally, Big Cypress National Preserve, the forth South Florida National Park started its General Management Plan for newly acquired lands in July 2001. The park’s superintendent is Mr. John Donahue.

Therefore, we have 4 integrated and reliant South Florida National Parks, going through the process of creating new 15-20 year General Management Plans (GMP), with one completed, Dry Tortugas National Park and one just starting, the Everglades National Park.

The hypothesis of this discussion document is that we can learn from what has happened in other parks and predict the changes that could occur within the Everglades National Park. This assumes business and apathy as usual. Alternatively, local government, local citizens and local businesses can get involved and make a win/win difference in the outcome.

## Section 2: Background - National Park Service (NPS) Planning



In May 1998, Robert Stanton, Director of the National Park Service (NPS) formalized the National Park Planning process with Director's Order #2. Citing the Organic Act and other legislation he directed the Park Service to take a more comprehensive approach to planning and how resources, visitors, and facilities will be managed. This more comprehensive planning framework was established to "preserve resources unimpaired for the enjoyment of future generations." Mr. Stanton went on to direct that the planning process demonstrate logic, trackable rationale, public involvement and accountability. Four interrelated planning processes were established; general management planning (the big one), strategic planning, implementation planning and annual performance planning. There were other plans required before DO #2 that were never eliminated and of course, other mandatory plans and studies that have been since created by the NPS. They include wilderness management plans, environmental impact studies, capacity carrying studies, site plans, commercial services plans, resource management plans, special resource studies, and the list goes on. There are also things like the Compendium of closures and other restrictions imposed by the Park Superintendent. For example, the ENP needs 23 pages to tell us about special restrictions under the discretionary authority of the ENP Superintendent.

The key, critical NPS planning document is the General Management Plan (GMP). The GMP process is well defined, and frankly, from looking at several recently completed GMP's, the end result is mostly boilerplate material with the exception of creative thinking involving the definition of new management zones and, where and how those zones are laid on the land and water. Depending upon the recommendation, there are unique and abundant materials added to justify the decision. In the case of the recently completed Dry Tortugas National Park GMP, there were over 400 pages of justification included.

The last comprehensive plan for the ENP was completed in 1979 and it was called a "Master Plan." A quarter of a century has elapsed since the last "road map" for ENP was created. Obviously, there have been some changes in our world and in people's attitudes since then, so it might be safe to assume the new framework to guide decisions for long-range park management, resource protection, appropriate types and levels of visitor activities and, facility development might be very different than what we have been accustomed to.

### Section 3: The General Management Plan (GMP) PROCESS

The time required to complete a new GMP varies by National Park. Some are very small, less than an acre in size. Some are quite large and diverse such as ENP, which comprises 1,509,000 acres or 2,358 square miles. It is expected to take 4-5 years to complete the ENP's GMP. The NPS planning process does evolve and change slightly with each GMP created. More specifically, it appears greater testing of public reaction is being done earlier in the process and there is a strong indication that each park will establish a number of different management zones with each having its own set of rules.



There are five phases to the GMP planning process. They are:

- Scoping – Essentially talking, soliciting and receiving correspondence from park stakeholders. Theoretically, there are no preconceived solutions at this stage or even clear definition of problems. The problems will become more clear at the end of this phase. This will take about a year for ENP planners in Denver to complete. During the Scoping Phase, planners will probably categorize each comment with a code that allows for moderate analysis and the crafting of conclusions. Once the scoping phase is completed, the results will be reported to interested stakeholders. Biscayne National Park (BNP) started its scoping phase in January 2001 and in September 2001 summarized 2,100 responses in 3 ½ pages. They went further though, and shared draft management prescriptions. The draft prescriptions varied by also “draft” management areas. The management areas ranged from developed to pristine areas. The public was invited to respond to the draft prescriptions and it was made clear that some or all of the prescriptions will become the Park's management guide. The public was also asked specifically to respond to what Biscayne National Park's position should be in regards to taking fish for commercial sale (not allowed in ENP at this time), commercial guide fishing (fishing with a guide for fee versus fishing on your own), and speed limits in the park. Clearly, NPS Planners are testing the water early in the process and seem to be looking for early public input to accelerate the planning process. In my personal opinion, the BNP Scoping Phase report-out and request for more information was a little bit like loading the deck, but on the positive side, they did provide real food for thought which should improve the next round of public input.

The NPS is making it clear they are headed toward implementing different management areas within Biscayne National Park with each type of area having different rule sets that will impact resources, visitor experience and management actions. This was also recently done at Zion National Park in Utah. Zion National Park has 132,000 acres and the recent GMP designated 110,000 acres as pristine and 13,602 as primitive. What's the difference between pristine and primitive management areas? One definition used at Zion is a visitor should encounter no other persons in a day while in pristine areas and 1-12 people per day while in primitive areas. Therefore, 83% of the park has been set aside for a few people to visit and never see others while there. Biscayne National Park's recently shared draft management areas include, reserve areas (complete protection - no access), primitive areas (allowing access while protecting resource and restoring disturbed areas), recreation areas and navigation corridors. During the ENP scoping phase, there will probably be some powerful organizations weigh in with their opinions, such as the Sierra Club and Audubon Society. Information collected during the Scoping Phase is mostly subjective and not statistically valid. While it is clear the NPS wants public input and values it, public opinion cannot stand a test against valid science or federal regulations. I might add that in the case of ENP, Terri Urbanowski, [terri\\_urbanowski@nps.gov](mailto:terri_urbanowski@nps.gov), the head planner for the Everglades National Park's GMP, recently indicated she was pretty sure there would be extra steps taken to ensure the public is heard. This was in part due to the Free Press article written by Steve Gibbs in February 2003.

- Date Collection and Analysis- This too will take about a year to complete, perhaps longer. During this phase, planners will be trying to clarify where ENP is now, what is known and what is unknown. There will be great focus placed on available scientific studies and new studies. Perhaps the largest consideration during this phase will be compliance with the Organic Act, the Wilderness Act, the National Environmental Policy Act, the Marine Mammal Protection Act, the Park's Fundamental Purpose, the Endangered Species Act, the Oceans Act, Coral Reef Protection via Executive Order 13089, the National Parks and Recreation Act, the NPS General Authorities Act, the Clean Water Act, the National Marine Sanctuaries Act, Marine Protected Areas Executive Order 13158, the collective mission and goals for National Parks in S. Florida, and probably some new environmental acts or executive orders that will be passed over the next few years. There will be demographic studies, trend analysis, population surveys, boater registration analysis, economic impact formulation, seagrass analysis, fishery diagnosis, water quality analysis, and pollution analysis to include water, air, noise and light.

And of course, public input gathered in the scoping phase will be considered, as subjective as it is.

During this phase, as you might expect, certain hypothetical and preferred alternatives will start to materialize, thus causing more data collection and analysis to validate the findings. I forgot to mention the Everglades National Park and Expansion Act of 1989 will also be considered during this phase.

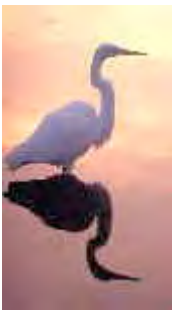
- Alternatives Formulation - The third step in the GMP planning process is developing different alternatives for action. These alternatives zero in on the impacts and implications of any proposed action in the plan - today, tomorrow and in combination with other actions. Planners in Denver tell me, "in many ways, this is the most important part of the document." Normally, there will be 4-8 alternatives evaluated in a GMP, with one being "No Action" and one being "The Most Environmentally Preferred" with other alternatives sounding like moderate change, protection with limited access and ongoing research/monitoring, and probably an alternative that allows for a range of management zones. Management zones could include things like high development zones, low development zones, primitive zones, restricted zones and pristine zones. An environmental impact study will be completed and more input from the public will be requested. Once the alternatives are formulated, we can count on a large number of opinionated and well-educated people to share their view. Some extremists will want NO fishing, boating or anything in ENP. The National Resource Defense Council and National Parks Conservation Association will probably speak out perhaps requesting a fishing ban as they did and got within Dry Tortugas' GMP. These two organizations alone claim to have about 1 million members. Others with impressive addresses in Washington D.C., London, and New York City will weigh in. Some individuals will even go so far as to strongly advocate the park be made available for only what they like to do - nothing else, such as sailing. If you review the 488 page Dry Tortugas GMP, you will see a good example of the range of comments and the diversity of people making comments on GMP's. Some people expressed a desire to close or highly restrict all access to Dry Tortugas because of global warming. One man wanted even more restrictions than the chosen Alternative C, because he read a book about how too many cows leads to no milk. These "unique" letters were actually included in the final report. The NPS has guidelines that define what makes a comment substantive or necessary to respond to. Any substantive comment and all comments from agencies are added to the final GMP.

- Draft Plan - I would estimate that in late 2006 we will have the Everglades National Park's draft GMP and Environmental Impact Study. There will be another public comment period for perhaps 60 days and it will also be intense.

All the powerful environmental and conservation groups will probably be heard from. The Center for Marine Conservation and the World Wildlife Fund International for example. Some public comment may be responded to by the NPS, but at this point it is pretty much over. While many will continue to comment and public hearings may even be scheduled, I get the impression the draft plan is probably more to get final buy-in from other government agencies than anything else. They will include the FDOT, Florida EPA, FWC, DNR, DCA, Department of Agriculture, US Environmental Protection Agency, NOAA and more. Some of these agencies will have concerns and actions will be taken by the National Park Service to address those concerns, resulting in:

- The Final Plan - The National Park Service should complete the Everglades National Park's GMP sometime in 2008 and the plan will probably have a life of 15-20 years. The final plan will be posted in the Federal Register and another 30 days will be allowed for comments. On occasion, this comment period has been expanded.

#### Section 4: The Park - (Source NPS Planning Documents)



- Perhaps most important is the Park's Purpose which is: *It is a public park for the benefit and enjoyment of the people. It is set apart as a permanent wilderness, preserving essential primitive conditions, including the natural abundance, diversity, behavior and ecological integrity of the unique flora and fauna.*

- The first person to speak in Washington on behalf of the park was Horace M. Albright, Director of the National Park Service. Mr. Albright said "That Cape Sable area is one of the most beautiful places I have ever seen anywhere. It is a strange land, full of strange plants. There is an atmosphere of mystery and strangeness about the whole thing that attracts the attention of all who see the Everglades and will attract the multitude as much as a park like Yellowstone."
- The park was dedicated by Congress in 1934. Because parklands at that time could be only acquired through public or private donation, the park was eventually established 13 years later.
- President Harry Truman dedicated the Everglades National Park on December 6, 1947 stating "*We have assembled to dedicate to the use of all people for all time, the Everglades National Park.*"
- The park has grown from 460,000 acres to 1,509,000 acres since its inception.
- The park has a designated Wilderness Area of 1,296,500 acres. It is the largest Wilderness Area east of the Rocky Mountains. Wilderness Areas present unique requirements for management and involve the Secretary of Agriculture as well as the Secretary of Interior.
- In 2000, the \$8 billion Comprehensive Everglades Restoration Plan was approved. The Army Corps of Engineers are on point for this project, not the NPS.
- Numerous projects scheduled for the next 30 years will alter hydrologic conditions, landownership, local, regional and national policy and even political relationships. The GMP will consider these inter-related issues and their potential effects on the park.
- The park currently offers a range of recreational opportunities to include fishing, nature hikes, canoeing, camping, motor boating and wildlife viewing.
- The park operates on an annual budget of approximately \$14M, which is used for resource preservation and management, law enforcement, visitor services, scientific research, facility operations and maintenance, park administration, and minor construction. To put things in perspective, the Village of Islamorada's budget is approximately \$10M with far fewer employees. The ENP functions on a very limited budget.
- The park has huge and global significance:
  - o Designated a World Heritage Site in 1979, an International Biosphere Reserve in 1976 and a Ramsar Wetland of International Importance in 1987
  - o Largest sawgrass prairie in N. America
  - o Home of 14 endangered\* and 9 threatened species
  - o Only subtropical preserve on the N. American continent

- Largest mangrove ecosystem in the Western Hemisphere
- Contains cultural resources documenting 3000 years of U.S. history
- Contains a nationally significant estuarine complex (Florida Bay) and major nursery ground that supports sport and commercial fishing
- Functions as a major corridor and stopover for geotropically migrant species in the S. Florida ecosystem
- Is the home of the Miccosukee Tribe of Indians of Florida
- Provides foraging habitat and breeding grounds for migratory wading birds
- Serves as a crucial water recharge area for S. Florida through the Biscayne aquifer
- The park is suppose to be under the exclusive jurisdiction of the NPS (highly debatable) with the exception of 333.3 acres permitted to the Miccosukee Tribe

\*American crocodile, Green turtle, Atlantic Ridley turtle, Atlantic hawksbill turtle, Atlantic leatherback turtle, Cape Sable seaside sparrow, Snail (Everglades) kite, Wood stork, West Indian manatee, Florida Panther, Key Largo wood rat, Key Largo cotton mouse, Red-cockaded woodpecker, Schaus swallowtail butterfly and the Garger's Spurge. Note: The American Crocodile is expected to be moved from endangered to threatened species status in the near future.

- The park has several unique challenges according to the ENP website
  - Water management is far the largest challenge. ENP faces 4 issues, the quality, quantity, timing and distribution of water which is critical to the Everglades and its wildlife
  - Everglades' wetlands have severely disrupted the natural relationships between wading birds and water conditions. As a result, sharply reduced nesting areas have led to a reduction of wading birds nesting from a maximum of 300,000 in the 1930's to 10,000-15,000 at this time.
  - The proliferation of exotic species displacing native plants
  - Urban encroachment
  - The NPS does not control essential aspects of the ecosystem with numerous competing needs and little agreement within agencies
  - Revitalizing Homestead AFB while protecting ENP
  - Conflicts in meeting public enjoyment expectations and current environmental requirements
  - Declining fishery resource
  - Agency conflicts between species management and ecosystem management
  - Hole in the Donut restoration and visitor conflicts

- Jurisdiction not clear in certain parts of the park
- Giving Seminole and Miccosukee Tribes power to exercise their existing rights in a manner that does not conflict with the park's purpose.
- Overcrowding and lack of carrying capacity models

**Section 5: How much can a new GMP change a Park? - let's use the recently completed Dry Tortugas National Park (GTNP) GMP as an indicator**

- No more recreational fishing in certain areas, private boaters allowed only by permit. A major change since recreational fishing was allowed before
- From low carrying capacity to very low assigned to zones and areas to control damage
- An entrance fee is being instituted-although it was noted that a researcher concluded a \$5 entry fee was too much for many visitors to pay
- Opportunity for solitude will go from low to very high
- Noise levels from boats and visitors will go from moderate to very low except at the Fort
- From anchoring permitted throughout the park to no anchoring in some zones and mooring in others. Overnight anchorage only permitted in historic preservation adaptive use zone
- Encounters with other people will go from high to moderate at Garden Key and low at other destinations
- Level of visitor use patrols will go from high to moderate
- Level of interpretation (education) will go from moderate to high, especially when obtaining permits for boats
- Research Natural Area (RNA) zones will be established to protect reef fish, coral, seagrass beds, and sand bottoms
- Two ferry boat concessionaires will go to one to limit visitors
- From unmonitored terrestrial habitats used for picnicing, viewing, walking, etc. to monitored and restricted access to much of the terrestrial habitat areas, and the use of more structured tours
- From protecting bird nesting sites to eliminating fishing and restricting boat use within the RNA zone to reduce the risk to birds that are caused by boating and fishing
- From allowing recreational boaters with little knowledge of the area that adversely impacts turtles, to measures that control access to land based environments and eliminating fishing and restricting boat use

- From allowing unrestricted access to parts of the park frequented by manatees and coastal dolphins causing adverse impacts from collisions and propeller contact, particularly the NPS planners say from “young and old individuals that are less mobile and less able to avoid collisions” to eliminating fishing and restricting boat use
- From noise levels threatening turtle and bird nesting to visitor capacity limitations and reduction of boat use resulting in less noise
- From the potential of minor to major oil or fuel spills caused by boats to fewer boats, fewer groundings, less pollution, etc.
- From shipwreck sites and historic structures being adversely affected by increased park visitation due to insufficient funding for protection, to cultural resources receiving major long-term benefits from limited visitor numbers, adopting the Submerged Cultural Resources Strategy, requiring visitor permits and adopting research natural zone areas
- From having negligible impacts on Monroe County’s economy to continued negligible impacts, because local charters would have opportunities in nearby waters for one thing, it was explained
- From long term moderate impacts to park operations and facilities to more efficient/safe operations, which would ease the burden on the park’s limited facilities

While Dry Tortugas is a good example of just how far reaching a GMP can be, there are major differences between the ENP and DTNP. Dry Tortugas has a purpose statement that totally revolves around the protect and preserve words and says nothing about making the park available to the public (although the Organic Act does), and Dry Tortugas involves coral reefs. However, the plan does make it clear just how far logic and justification can be stretched to justify a desired outcome. It is also a good example of how people value Mother Nature differently, from hearing the wind blow and not seeing another person for days, even if it means few people will ever have the same opportunities or even something close to it. To others saying, let me be a responsible boater and angler and legally fish in these beautiful waters. Bottom line Dry Tortugas has apparently chosen to lean toward preservation and protection at the expense of reducing the number of people who will have the chance to see the Park in any capacity.

## Section 6: Some definitions and facts, many recently used by NPS Planners



- conserve – to keep in a safe and sound state
- unimpaired – uninjured, left complete or entire
- intact – untouched by anything that harms or defiles
- protect – to cover or shield from injury or destruction
- preserve – to keep intact, save, to keep from injury
- degrade – to reduce from a higher to a lower rank or degree, to depreciate
- access – a means of approaching, the right to enter, to approach
- restrict – to keep within certain limits, confine
- pristine – original, still pure, untouched, unspoiled, uncorrupted
- primitive – existing in the beginning or earliest times, uncivilized, crude, simple, rough
- reserve – set apart for later, withhold, control
- Organic Act of 1916 and later amendments – empowers the NPS to conform to the fundamental purpose the National Park Service, which is to conserve the scenery and the natural and historic objects and the wild life 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. The Organic Act has been consistently upheld in courts, for example ENP prohibited commercial fishing and it was upheld in court when a lawsuit was brought by commercial fishermen (*Organized Fishermen v. Watt*, 590 F. Supp 805 (SD Fla 1984) affirmed 77 F.2d 1544 (11<sup>th</sup> Cir. 1985))
- Wilderness Act of 1964 – The Park was designated mostly wilderness in 1978, essentially at the same time the last “master plan” was completed. This will be the first comprehensive plan developed since ENP was given Wilderness distinction. The Act was established to assure that an increasing population and expanding settlement and growing mechanization does not leave certain lands for designated preservation and protection in less than their natural condition. The act also prohibits certain uses:

(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

*Special Provisions*

(d) The following special provisions are hereby made:

(1) Within wilderness areas designated by this Act the use of aircraft or motorboats, where these uses have already become established, may be permitted to continue subject to such restrictions, as the Secretary of Agriculture deems desirable. In addition, such measures may be taken as may be necessary in the control of fire, insects, and diseases, subject to such conditions as the Secretary deems desirable.

- Socio-economic Data - Taken directly from the recently completed Dry Tortugas GMP ----- Possibly the most important factor influencing S. Florida is its explosive growth. In 1970, there were nearly 2 million people and there were 3.7 million in 1997. Population is expected to be 4.5M residents by 2015.

The region has < 8% of the state's land area but 25% of the total population. Growth has been slower in the Monroe County due to ordinances to limit growth. In 1997, Monroe County had 81,169 permanent residents, which fluctuates seasonally. More than 4 million people visit the Keys every year. Visitors to the Keys comprise 42% of the total population during the peak season. The number of registered boats in Monroe County increased 48% between 1988 and 1999. An upward regression value of 0.97 means this trend will continue. Tourism generated about \$2.2 billion dollars in value for all goods and services between June 1995 and May 1996. The NPS used their Socio-Economic Studies Division to prepare a money generation model as they often do to provide a way to estimate economic benefits to parks and local areas. They concluded Dry Tortugas contribution to the economy was only \$10.5M in sales benefits, \$734,000 in tax revenue and 315 jobs. \$10.5M is not a big deal in a \$2 billion dollar Monroe Country economy.

## Section 7: ENP Socio-Economic Estimates for the Upper Keys

Not having the time to do full research, and with most data being outdated, let's do some math for just the Upper Keys area and get some impact ideas. In addition, I will be using Table 6 from the Dry Tortugas GMP, which shares average trip expenditures per person between June and November 1995. Obviously, these numbers have dramatically increased in the last 8 years.

I estimate there are at least 250 backcountry guides working in the Upper Keys. There are around 120 or so members of the Florida Keys Fishing Guides Association, 20 or so in the Key Largo Guides Association and a bunch that don't belong to either one. That number may sound high, but I really think it is low. I have names and addresses for over 150 local guides and it is a very incomplete backcountry guide list. Lets assume 50 work 250 days a year, 50 work 200 days a year, 50 work 150 days per year, 50 work 100 days a year and 50 work 50 days a year. That is a total of 37,500 days of guiding per year.

Now let's also assume, half of those trips are in the Park (just one mile off the bay side shoreline). The other times they are shallow water fishing on the ocean side for bonefish, tarpon, shark, and barracuda and have no interest in redfish, snook, drum, backcountry tarpon or trout.

This is a very conservative number in my opinion, but let us use it anyway. We are now at 18,750 guided days in the Park per year.

Guide fees are \$400 for a full day or \$300 for a half day, plus gratuity. If they work a half day, they often work two half days for \$600 total, so lets assume every trip is worth \$400.

Therefore, I estimate \$400 times 18,750 days equals \$7,500,000 in guide fees that comes into our upper keys community from guides fishing clients in ENP.

According to a NPS visitor survey, businesses (guides are businesses) that receive tourist dollars have a ripple effect on businesses that sell supplies to them. They estimated the ripple effect amount to be 1.5 to 2 times more than the visitors spent. They also estimated that daily trip expenditures per person to be approximately \$260 for lodging, \$170 for food, and \$238 for transportation. That is about \$660 per day per visitor, back in 1995. Guides don't often take just one person fishing, but rather closer to two anglers fishing on any given day, sometimes having three on their boat.

So let's assume in today's dollars, for each day guided about \$1,400 is pumped into our economy if the client does not reside in the Keys. Let's assume if they do live in the Keys the economy gets a mere \$200 per day to pay for bait, gas, motors, insurance, taxes, tackle, taxes, interest, etc.

Again, being conservative, and admittedly still guessing based on personal experience, let's assume 3/4 of the trips were with out of town guests and 1/4 with local residents. So, of the 18,750 trips, about 14,000 were with out of town guests and 4,750 were with locals.

The impact of fishing in the Park in the upper keys now becomes  $(\$7,500,000 + (14,000 \times \$1,400) + (4,750 \times \$200))$  for a total of \$28,050,000.

So, let's use a round, yet conservative number of \$30,000,000 to make up for all the items we did not include like motor sales, boat sales, maintenance, ramp fees, ice, beverages, etc. Not to mention the jobs that are supported by our local backcountry guides – waiters, cooks, tackle shop employees, motel employees, mechanics, sales professionals, etc.

Additionally, we are not including revenue from nature trips to the glades and the economic impact of local users recreating in the Park which I would predict is more than double what the guides contribute to the economy. Anglers using the Park and not using guides also buy boats, motors, bait, tackle, insurance, motor maintenance, gas, lunches, etc.

Many locals own small skiffs along with larger boats that are used mostly in the Park. Let's again be conservative and assume the local use of the Park generates about the same economic impact as guides using the park, so now we're up to \$60,000,000 a year.

To further validate this number, if the NPS feels Dry Tortugas generates \$10,000,000 a year to the economy and 350 jobs, it is not unreasonable to assume Everglades National Park generates at least 6 times that amount for \$60,000,000 and 2100 jobs to just the Upper Keys.

Again, some might argue that \$60M is not much within a \$2 billion Monroe County economy, but what they may be forgetting is most of the \$2B economy is in Key West, not the Upper Keys. Impacting any portion of the \$60 million would be very painful to the Upper Keys, not to mention impact our customs and way of life.

**THE PONT IS not the precise accuracy of my estimates, but the socio-economic impact of the Everglades National Park to the Upper Keys is huge.** I think we can all agree to that. If any changes are made to the ENP that discourages people from recreating in the park and traveling by boat into the Park from the Upper Keys, our economy and our families will feel the impact. However, thoughtful adjustments can be made that better protect park resources, without discouraging people from recreating in the Park.

**Section 8: What are the negative impacts from Upper Keys Users to the Park and what can be done about it? Some points for thought follow:**

- Noise
- Wildlife interruption
- Seagrass damage
- Pollution – garbage, waste, chemicals
- Propeller scars
- Continued use of wheel ditches that have been created over the decades
- Less available solitary locations
- Fish harvesting within Florida State Regulations

What we really do is fish and sight see from the park boundary, to 9 mile bank, around Sandy Key, around the Cape as far North as Lostman’s River, and all up and down the mainland coastline in the bights and bays (from Key Largo to Garfield Bight. We do the same in and around Flamingo, Lake Ingram, Hells Bay, White Water Bay, Tarpon Bay and the many rivers leading into White Water Bay. We use the wilderness trail to reach many of these locations and share the water with kayakers and canoes. We often canoe and kayak in the waters ourselves, sometimes transporting our canoe by skiff to our location. Most of us are very respectful to anchored boats in channels and paddled vessels and idle by them if within 100 yards. We occasionally camp out with permits on Cape Sable. We use marked channels when running our boats and avoid shallow waters that won’t support our boat drafts in route to our destinations. And most important, we enjoy the scenery and natural wonders of the Park every time we enter.

We also see uneducated and inexperienced boaters running over flats, because there is essentially NO educational effort from the NPS to help users of the park and because most of the channels and flats are so poorly marked. We occasionally see experienced boaters also run across water that is too shallow for their skiff, looking for fish or getting to where they want to be on a large flat, or taking short cuts to their spots. We also sometimes see experienced boaters get on plane in water to shallow for their vessel, which damages the sea bottom.

All of these problems have simple fixes, without major change that would discourage use of the park by the majority. Those fixes sound like:

- Some flats being marked as non-combustible motor zones – pole, paddle or use electric motors all the way in and all the way out or stay out
- Better marked channels and navigation corridors
- Better education for boaters and anglers
- Increased enforcement efforts with cooperation from frequent users of the park – Rangers being on the water instead of hanging out around the fish cleaning station getting fish catch counts for example and Guides self policing themselves for example
- Developing a regulation that mandates coming off plane if within 100 yards of any paddled vessel or stationary vessel
- Potentially keeping all vessels at least 100 yards away from significant and permanent bird nesting areas such as already done at Sandy Key
- More focus on the need to not litter in the park – monofilament, trash or anything
- Not get over excited about noise levels, as this is a park for the people and users must accept noise levels in a park that is primarily accessed by boat. Furthermore, visitors must accept that human encounter levels are expected to be higher in ENP than some Western National Parks.
- Utilize restocking programs in the park if the fishery is actually declining. However, given the many fishing restrictions, limited bag limits, the fact most guides refuse to harvest a fish, improved water, and net bans, many people feel the fishing is the best they have seen in years. While fish may not be as abundant in some “old faithful” spots, they are there, in other spots and of nice size is what I hear and have experienced.

### **Section 9: Conclusion**

So what does all this stuff mean? CHANGE! As Paul Valery said, “The problem with the future isn’t what it use to be.” As the Queen said to Alice in *Looking Through The Glass* in 1872, “To stay where you are you must run as fast as you can. To go anywhere, you must run faster yet.” Change is accelerating faster than most anyone can really comprehend and the diversity of opinions is mind blowing to most everyone.

The GMP will change the ENP and how we interact with it. However, we CAN make an impact on the what, how, when and why change occurs by being proactive and non-complacent.

It is not easy to offer suggestions for improvement until we all have a common definition of the perceived and real problems in ENP. Hopefully, the Scoping Phase will give us that mutual starting point and we can more intelligently start joint problem solving next year.

However, when the next report shares the results of the scoping phase and probably some DRAFT MANAGEMENT PRESCRIPTIONS, it is going to be critical that we get more involved as a community than we recently did during public workshops. In Key Largo perhaps 65 people participated, in Key Colony Beach perhaps 5 people shared opinions and in Homestead, approximately 75 people stopped by the workshop. The comments shared at the Key Largo workshop were incorporated with initial thoughts from Park Employees, at the Homestead workshop, indicating the planners are listening.

But the reality is demographics are changing and people that have never truly experienced the ENP are going to voice their opinions very loudly. While the public has more time for recreation, there is also more time available for people to sit back and write green letters to the NPS. These people will probably be requesting ENP essentially be closed to visitors, unless they have a special permit, or more zones for only bird watchers, or paddle only if in the water, or participate in a guided tour to see the Park.... and fishing should be banned and anchoring should be prohibited and they want to be able to hear nothing but the wind and wildlife when they visit, and other points of similar nature. While it is extremely unlikely much of the Park will be closed, it can be restricted to the point of unacceptability if we don't proactively get involved. Rather than extreme changes, I am optimistic the changes will be reasonable. I feel strongly that Ms. Maureen Finnerty and Fred Herling the ENP Supervisory Planner, are reasonable and fine managers. I feel they value the purpose of the Park and want the public to enjoy it with as few restrictions as possible. I am confident they value our input. Time will tell.

My hope and guess is rather than extreme changes, we might see modifications like: (although I personally don't like them all, I could live with all of these)

- New Management Zones - which we must help define and also help develop the rule sets that govern the zones
- Speed limits
- Motor horsepower restrictions in the Park - while I don't like the idea, it is practiced in many places around the world
- Vessel size or vessel type restrictions in certain management zones

- More non-combustible motor zones or God forbid – more total no motor zones. However, the current no motor zones could be changed to allow for trolling motors and poling even with a motor on the transom and some no access zones could be opened to low impact traffic
- More markers and signs
- Guides helping with education and enforcement efforts
- A park auxiliary made up of trained volunteers
- Stricter fishing regulations than those imposed by the State of Florida, such as catch and release only in the park
- New capacity control models and measures mostly for winter months
- Seagrass restoration efforts, such as we see in the Upper Keys
- Phased in requirements mandating more environmentally friendly motors, noise, emissions, etc. Not likely as it discriminates against low to medium income users, but it is an idea
- Engine noise regulations, such as those that exist in Florida Regulations now
- User fees (daily or annual passes) for everyone using the park, even if coming in by water as the guides pay now and visitors entering by car also pay now – by the way, I was informed by a senior Park employee that 80% of all user fees stay in the Park’s budget

What we cannot allow is more closed or highly restricted areas FOR ANY USERS unless under very extreme circumstances. Or the right to travel by motorized vessel in marked channels and waterways, the right to navigate to all park destinations, any banning of fishing or banning use of the Park by commercially licensed guides, and the right to anchor within the park – even if overnight. The very thought of the latest BNP GMP newsletter soliciting opinions about allowing commercial guided fishing in the Park greatly concerns me.

The park already prohibits all commercial fishing, diving for lobster, netting of fish other than to gather bait (and the mullet better not be too big or too many of them), entrance into Joe Bay and Little Maderia Bay, entrance into many areas with a motor of any type mounted on your transom, vessels near certain bird nesting areas, and more.

It seems to me that we must accept some change and not be overly extreme through this process. On the other hand, we must be prepared to not let the other side of extremism get their way. We are becoming better stewards of the Park waters and all waters with each passing day. Yet, we need to get and stay involved, especially when the Scoping Phase is done.

We cannot just assume that no changes will occur that could destroy a way of life in the Upper Keys and severely damage our local economic model. We cannot just assume the powerful “right to fish” organizations we support can make a difference, because they did not in Dry Tortugas and are losing battles every month. We cannot assume that because we pay an indirect tax of 10% on every single piece of fishing gear (hooks, jigs, lures, line, rods, reels, etc) via an excise tax collected at the manufacturer level, and pay for fishing licenses thus doing more for conservation and resource protection than any government agency or user group, we have special rights. We cannot assume that just because the Park’s purpose clearly says make her available to the public that access will not be severely limited.

In reality the crafting of the new GMP for ENP is more in our hands than the National Park Service. They must comply with Acts and Executive Orders but we are the real users and protectors of the resources. As frequent ENP users know, the Park is actually under utilized by a number of user groups and it is too bad more people don’t get the chance to experience its magic. The Park is very remote and harsh, and it is very difficult to navigate on land or water. On most days, whether in front of Flamingo or in the White Water Bay area, you see less than a dozen other boats while in the water and other than a few channels, the boats never get close to each other. The Park is huge with more room than the current number of users can even begin to visit. Winter weekends do bring more trailered vessels to the Park where they use the wonderful boat ramps provided by the Park. Boats don’t bother canoes and canoes don’t bother motorized boats. We see very few bird watchers in canoes, which would allow them to approach large flocks of birds on low tides. In the winter, there are more land based visitors and people on the tour boats. In the summer, the Park essentially closes, offering no dining and no mosquito protection. Visitor levels by the Park’s own admission are decreasing NOT increasing.

However, given this Park is so unique and of Global importance, and is mostly a wilderness area we could be shocked by the recommended alternative for change. The environmentalist groups and many people, who probably have never visited the Park other than a land-based visit, will persuasively argue for the conserve, close, protect, and keep intact side of the debate. They will want it all and at the same time expect there to be enough money and management time to correct the ENP’s real 20 year issue --- water quality, quantity, timing and distribution.

So please, do not sit back and do nothing until it is too late. Don't be upset when others get overly excited in your opinion, but rather encourage discussion and passionate debate. Participate in the process, stay informed and support reasonable change. Don't rely on others to say what you think. Don't assume something has been said once, so why voice it again. The NPS needs to hear redundancy to get the message.

There is too much at stake and too many factors that could unacceptably change the Park to most Upper Keys residents if we take our usual apathetic, what me worry, they would never do that, attitude or get involved at the last minute when it's already a done deal.

Write and ask to receive newsletters and updates and include your thoughts to:

NPS-Everglades National Park  
General Management Plan - Terri Urbanoski  
12795 W. Alameda Parkway  
PO Box 25287  
Denver, CO 80225  
Email [terri\\_urbanowski@nps.gov](mailto:terri_urbanowski@nps.gov)

Or go online to:

[planning.nps.gov/plans.cfm](http://planning.nps.gov/plans.cfm) and go to the ENP GMP and click on input

Alternatively, write to:

Fred Herling  
Supervisory Park Planner  
Everglades and Dry Tortugas NP  
40001 State Road 9336  
Homestead, FL 33034-6733  
Email [fred\\_herling@nps.gov](mailto:fred_herling@nps.gov)

In addition, please do attend any future workshops that might be offered to get your input.

Finally, once the scoping findings are distributed, it might be a good idea encourage the formation of a task force with a representative from the Florida Keys Fishing Guides Association, the Key Largo Fishing Guides Association, the Marine Industry, the Kayak/Canoe Industry, a Park Nature Tour Representative, the Islamorada Fishing Club, the Matecumbe Anglers Club, the Village Council, the Tourist Development Council and others I have forgotten.

Objective being to attempt to get some consensus around what's best for our community and the ENP and some real commitment to doing more than our fair share to address problems that are identified.

And last, clearly this article is biased. I am not an environmentalist but I am a conservationist. I love the Everglades National Park as much as anyone does. The Park to me is unique and wonderful and at times brings tears to my eyes when visiting. I am an outdoor person and a steward of our lands and waters. I fish and hunt, and look forward to doing the same with my grandkids. These things are customs to my family.

While I agree that there are some unusual circumstances that may require the NPS to take extreme measures to protect resources (like saving the Crocodile or a historic site), I fail to see similar circumstances within ENP at this time, especially if the recreational users of the Park and our backcountry guides do our part. I know there are extremists on both sides and some anglers will have major disagreements with any additional restrictions, given the parks history of never giving anything back. Sorry! The resources are not forever and without better stewardship by all of us, changes that most of the real users of the Park don't value may be implemented.

For now, let us take better care of the Park with each passing day and practice better courtesy and respect to each other while on the water.

Good day!

See Attached Fishing Etiquette Article