



National Parks Conservation Association®
Protecting Our National Parks for Future Generations®

November 23, 2009

Everglades National Park,
40001 State Road 9336
Homestead, FL 33034-6733

Re: Everglades National Park: Proposed Florida Bay Pole and Troll Zone

Dear Superintendent Kimball:

On behalf of National Parks Conservation Association (NPCA) I am writing to express our support of the creation and study of a Florida Bay pilot pole and troll zone in Snake Bight, in advance of the final record of decision for the Everglades National Park General Management Plan (GMP). We expect this undertaking will contribute to a high level of protection for Florida Bay and help identify the best management practices for GMP implementation. We would like to thank ENP and all of those in the National Park Service (NPS) for taking the time reach out to stakeholders, listen to concerns with the GMP draft alternatives, and then take this important step to pilot test a pole and troll zone in Florida Bay.

In this letter, we will limit our comments to those issues pertaining to the pilot pole and troll zone in Florida Bay. However, we would like to reiterate that NPCA is encouraged that “The NPS intends to build the principle of adaptive management into the GMP implementation process so that the plan is dynamic and responsive to changing conditions, new information, and ideas from the public.” NPCA encourages the park and NPS, throughout the development of the GMP to continue to evaluate and engage stakeholders to determine the best tools for protecting the Bay’s resources. The final GMP should remain flexible enough to accommodate future modifications (location, timing, management tools, etc.), if and when they are deemed necessary. These types of adaptive management practices should be a theme throughout the GMP planning process and its implementation phase. NPCA’s comments provided herein are not immune to an adaptive management strategy implemented by the park. If, over the remaining course of the GMP process, new information is presented, conditions change, or new tools are developed, we are fully supportive of adapting our comments and recommendations to work within a new framework.

Florida Bay is a unique natural resource and a world-class recreational destination for anglers, paddlers, and birders. At the heart of Florida Bay’s ecologic health is seagrass and inexperienced or careless boaters can easily damage the Bay’s sensitive resources. Boat propellers can churn up sediment and suffocate seagrass. “Prop scars” from boat groundings and mariners losing their way leave extensive damage that can take more than a decade to recover. NPCA supports the long-term protection of Florida Bay and the use of innovative resource management strategies for Florida Bay that will provide real world feedback. A Florida Bay boater education program like Eco-Mariner and the proposed pilot pole-troll zone in Florida Bay are good examples of the type of innovative and relatively low-cost type of projects that can truly benefit the park’s natural resources and can be developed and implemented through coordination and communication with the larger stakeholder community.

NPCA strongly supported ENP's scientific undertakings (*Patterns of Propeller Scarring of Seagrass in Florida Bay; Aerial Survey of Boater Use in Everglades National Park Marine Waters*), to gain a better understanding of current prop scarring and boat use patterns in Florida Bay. As a result of those scientific efforts it became clear that as the South Florida population has increased so too has boat ownership and the number of boats using Florida Bay. In addition it was apparent that prop scarring, especially in the north central portion of Florida Bay (Snake Bight, Garfield Bight, Terrapin Bay, etc.), was negatively impacting the resource. Assuming boat usage patterns continue to increase, park management action is warranted to address the documented and likely continued deterioration of the resource.

NPCA supports the park taking the necessary steps to protect the crowns of Florida Bay's banks and flats. To begin to accomplish this, NPCA supports a pilot pole and troll zone in Snake Bight. This concept has the potential to improve resource protection in an area with significant documented propeller scarring, boat groundings, and overall bottom damage. It is our hope that by targeting this area the resource will rebound and the subsequent user experience will improve. NPCA supports the proposed resource monitoring and compliance program along with a survey of visitor experiences for the Snake Bite pole and troll zone. NPCA recommends adhering to the principles of adaptive management, so that park managers have the flexibility to adjust the management of this pole and troll zone as dictated by future documented conditions. Finally NPCA supports the combining of those monitoring elements of the Snake Bite pole and troll zone with similar monitoring elements for a pilot study of channel markers in Florida Bay. In the future when the Park and NPS develop a comprehensive Florida Bay channel-marking plan, the results from the monitoring of these two pilot projects should help provide the best available science and thus the best management practices can be identified and implemented so that Florida Bay will continue to exist for the enjoyment of present and future generations.

Thank you for the opportunity to participate in the Everglades National Park Florida Bay Pilot Pole and Troll Zone public comment period. We look forward to working with the park to produce an effective and innovative plan that protects and enhances the natural and cultural resources of the park, not just for today, but also for generations to come.

Sincerely,



Jason Bennis
Sr. Marine Program Manager
Sun Coast Regional Office
National Parks Conservation Association
450 N. Park Rd, Suite 301
Hollywood, FL 33021