

May 9, 2013

Dan Kimball, Superintendent
Everglades National Park
40001 State Road 9336
Homestead, Florida 33034

Dear Superintendent Kimball:

The International Game Fish Association is pleased to submit the following comments on the Draft General Management Plan / East Everglades Wilderness Study / Environmental Impact Statement (draft GMP) for Everglades National Park (ENP). As you are aware, the IGFA has been working extensively with ENP staff on this matter and we would like to thank you and your staff for making yourself accessible to hear our thoughts on the GMP. IGFA has also been working closely with other recreational organizations such as the American Sportfishing Association, Coastal Conservation Association, Bonefish Tarpon Trust and the Florida Keys Outfitters and the comments below will no doubt mirror some of those given by the aforementioned groups.

While IGFA certainly recognizes the ecological significance of ENP and the need to protect submerged habitat, we have several concerns over the GMP's preferred alternative. The proposed poll and troll zones would effectively close approximately 1/3 of the park to combustion engine use. While IGFA is not opposed to the implantation of additional poll and troll zones and their potential benefit to habitat and fisheries, we have the following comments about the preferred alternative.

Delineation

Florida Bay is a complex mosaic of basins and shallow banks and properly marking or delineating areas designated for poll and troll zones will be difficult. This is exacerbated by the park's mandate to maintain a "wilderness experience". As such, the use of conventional markers to delineate the irregular shapes of the proposed poll and troll zones would not only be impractical but would also significantly diminish the park's wilderness experience. We are also concerned about the park relying on GPS technology to mark poll and troll zones, as not everyone will have access to this level of technology. In addition, needing to constantly look at a GPS for navigation takes boaters' eyes off the water and can be a safety hazard.

Implementation

Implementing all proposed poll and troll zones at once is impractical. We suggest a phased approach with adaptive management. We suggest first starting with Dave Foy Bank as a continuation of the existing Snake Bight poll and troll zone. Secondly, we suggest the first series of banks just north of the Florida Keys along the Intracoastal Waterway. Both of these areas are heavily used and represent the first areas of shallow water encountered in the park when launching from Flamingo or the Florida Keys.

Access

The proposed poll and troll zones are expansive, severely limit boater access and can also pose a safety hazard in not giving boaters the ability to readily flee from frequent summer thunderstorms. The preferred alternative also does not consider the myriad of existing channels and sloughs commonly used in a responsible fashion by small boats. IGFA has worked extensively with the Florida Keys Outfitters to better define existing channels and navigation routes with water depths that allow on plane or idle

transit and we endorse the map being sent by the Florida Keys Outfitters. We feel that increasing the number of on plane and idle transit areas will significantly improve boater access, ameliorate weather associated safety issues and general help improve compliance.

Education

Safely and responsibly navigating ENP can be difficult to the uninitiated. IGFA strongly endorses a mandatory education component for boaters utilizing ENP. The Eco-Mariner online boater course developed by the National Parks Conservation Association was a good first start. We suggest expanding on this for a more comprehensive online education opportunity and also offering in person educational opportunities. Education programs should also emphasize how small and large boats should navigate differently in ENP.

Advisory Body

We encourage ENP to form an advisory body comprised of stakeholders that have significant institutional knowledge concerning boating and fishing in ENP. We feel this body could be a considerable asset to ENP staff in developing and implementing future management in the park. IGFA would be happy to participate in such a capacity.

In closing, most anglers and boaters utilizing Everglades National Park do not set out to intentionally damage submerged habitat. Nevertheless, we do understand the overarching mandate that ENP has to protect its submerged lands and that additional regulations are needed to accomplish this. We hope that the aforementioned suggestions can still provide meaningful conservation measures to ENP *and* at the same time continue to allow reasonable boater access to this national treasure. Thank you for your consideration and we look forward to working more with ENP staff in the future to manage and conserve this important resource.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. A.', written in a cursive style.

IGFA Conservation Director