



IN REPLY REFER TO:

L5404

United States Department of the Interior

NATIONAL PARK SERVICE

Everglades National Park

and

Dry Tortugas National Park

40001 State Road 9336

Homestead, Florida 33054-6733

JUN 08 2000

Colonel Joe R. Miller
District Commander
Jacksonville District
U.S. Army Corps of Engineers
P.O. Box 4970
Jacksonville, Florida 32232-0019

Dear Colonel Miller: *Joe*

The purpose of this letter is to convey to the Corps of Engineers (Corps) the position of the Everglades National Park with regards to the water quality and real estate requirements of the Canal 111 (C-111) Project. This letter is provided in order to assist the Corps in the completion of the C-111 Integrated General Reevaluation Report (GRR) Supplement and Environmental Assessment.

Water Quality

My staff has informed me that there have been technical discussions between the South Florida Water Management District, Everglades National Park, and your agency concerning the water quality sections of the C-111 GRR Supplement. John E. Zediak from your office has provided my technical people with two documents.

The first document dated February 2, 2000 appears to be the main portion of the GRR Supplement that discusses the Corps water quality strategy and it consists of 3 sections. They are: Section 1 - "Corps Water Quality Policy for South Florida Ecosystem Restoration," Section 2 - "C-111 Water Quality Strategy," and Section 3 - "South Florida Water Management District Ongoing Work-Water Quality (Everglades Stormwater Program - SFWMD)."

We feel that there are three things missing from this document. First, in the process of implementing this strategy, there needs to be a technical water quality team or peer review committee like TOC (Technical Oversight Committee) or ETAC (Everglades Technical Advisory Committee) that reviews the various work products to make sure that they are scientifically and technically sound. This group would then, by consensus, make recommendations to policy-makers and others concerning these work products. A brief description of the membership and their duties needs to be included in the GRR text.

The second item that needs to be included in the GRR Supplement is a discussion of the most recent water quality data and analysis from the S-332D pump test and the monitoring data resulting from the recent Cape Sable Seaside Sparrow Interim Structural and Operational Plan. It would be beneficial if the pertinent data was included in the appendix section.

The third missing item is a detailed description of the pilot scale testing of PSTA in the Frog Pond. Section 2.4.4 of the draft Corps Water Quality Policy For South Florida Ecosystem Restoration (Facility Design) states that a conceptual preliminary plan exists for using part of the Frog Pond as a water quality treatment facility. If this refers to the proposed pilot project with a peer reviewed project work plan, then the plan needs to be included. However, if this is not a pilot project with an approved work plan, an experimental work plan and budget for a PSTA pilot test needs to be drafted and included in the GRR Supplement. The potential need for such a treatment facility has become even more evident due to the recent water quality data from the S-332D pump station.

My staff strongly disagrees with the statement in Section 1.2 (second paragraph, second sentence) of the Corps Water Quality Policy For South Florida Ecosystem Restoration, that states that stormwater discharged to the coast in drainage canals and to Lake Okeechobee meet water quality standards. Lake Okeechobee, Caloosahatchee and St. Lucie Estuaries, Biscayne and Florida Bay all have nutrient and other water quality problems. Millions of dollars are spent yearly by the Corps of Engineers and the South Florida Water Management District to remove exotic vegetation from South Florida drainage canals and Lake Okeechobee. We believe that the uncontrolled growth of this nuisance vegetation is due to the high nutrient levels, and that these water bodies violate the narrative Class III nutrient criterion.

The second document is a Statement of Work dated August 23, 1999, and titled "Basin-Specific Feasibility Studies/Conceptual Designs Everglades Protection Area Tributary Basins for the South Florida Water Management District." This document appears to be a South Florida Water Management District product outlining a water quality strategy for the Everglades Agriculture Area. If this document is a template for the C-111 Basin, it needs to be revised to include information relevant to the C-111 Basin. In its current form, inclusion of the document provides little information specifically relevant to the C-111 Project.

Real Estate

As you are aware, the current configuration of the C-111 project as contained in the C-111 GRR, requires the use of approximately 1,078 acres of land currently within Everglades National Park. The current C-111 project design indicates the Corps intent to use these lands for the construction of a buffer region between the park and the adjacent agriculturally developed areas to the east of the park. This project feature, when used in conjunction with other structural features, are intended to provide additional water to Taylor Slough while maintaining currently authorized levels of flood control.

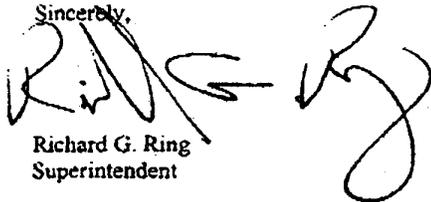
I must emphasize that the disposition of the needed park lands were not specifically addressed in the original 1994 C-111 GRR, other than to list the lands as required for the successful implementation of preferred alternative for the project. There was no mention of value nor was there a description of how Everglades National Park would be compensated for these lands. Since the release of the C-111 GRR in 1994, I have repeatedly told the Corps and the South Florida Water Management District (SFWMD) that implementation of this project must result in a minimum of no net loss of lands within Everglades National Park. This statement also applies to those lands being incorporated into the park through the addition of the expansion area, specified by Congress in the 1989 Everglades National Park Protection and Expansion Act. The National Park Service would never allow the donation of lands within the park for the purpose of implementation of a Corps project, without assurances from the Corps that the park would receive compensatory lands of similar quality to ensure the size of the park remains unchanged. Furthermore, since the size of the required lands exceeds 200 acres, Congress must authorize any adjustment to the park boundary that may result from the implementation of the project.

Past discussions regarding the real estate requirements for the C-111 Project have resulted in the concept of using a land swap exchanging park land for SFWMD wetlands of equal acreage and similar quality. Although the park supports this in concept, such a land swap will be undertaken entirely to assist in the implementation of a Corps Project. Specifically, the action (land swap or otherwise) must be fully documented in the Supplement to the C-111 GRR currently being drafted by the Corps. This document must contain sufficient analysis by the Corps to evaluate appropriate alternatives. Should the evaluation be satisfactory, we could then elect to adopt the NEPA document as a basis for a Record of Decision in support of a legislative proposal.

To assist the Corps in preparation of the C-111 GRR Supplement that addresses the land requirements currently within ENP, I have attached an evaluation completed by my staff of several alternatives for the land swap. This evaluation has also been shared with staff of the SFWMD and involves the transference of an equivalent acreage of state land in the Southern Glades Wildlife and Environmental Area (SGWEA) for the park land within the C-111 project area. Although the final details of the land swap would necessitate approval from the SFWMD and Congress, the Corps should include sufficient detail of the land swap in the C-111 GRR Supplement in order to assist the park and the District in securing such approvals.

In summary, please provide the park and the local sponsor of the project with a clarification of the Corps' intentions with regard to the water quality and the disposition of the lands within the park required by the C-111 Project. The revised Supplement should address the water quality issues stated above and should also clearly state that land within the park is a requirement of the project. It should also make clear that Everglades National Park is prepared to submit and support a legislative proposal to have this land within the park made available to the project only through an exchange of equal acreage. With this in mind, we ask that the Corps consider the attached analysis of alternatives. Should the Corps need our assistance in the completion of the final language for insertion in the Supplement, please do not hesitate to contact me or Project Manager David Sikkema of my staff.

Sincerely,



Richard G. Ring
Superintendent

Enclosure

cc:

Frank Finch, Executive Director, SFWMD
Dewey Worth, SFWMD
Lisa Smith, SFWMD
Cheryl Ulrich, U.S. Army Corps of Engineers



MEMORANDUM

To: Dave Sikkema, C-111 Project Coordinator, ENP

From: Skip Snow, Wildlife Biologist, ENP

Subject: C-111 General Reevaluation Report Supplement Land Swap

INTRODUCTION

In early May of 1999, the US Army Corps of Engineers (Corps) requested Everglades National Park (ENP) to evaluate several proposed alternatives for the addition of lands to the park in exchange for park lands identified as critical to the implementation of the C-111 project (see Figure – Southern Glades Land Swap Alternatives on page 8).

The current configuration of the C-111 project, as contained in the C-111 General Reevaluation Report (GRR), requires the use of approximately 1,078 acres of land currently within Everglades National Park. The current Corps design will use these lands for the construction of a buffer region between the park and the adjacent agriculturally developed areas to the east of the park, in conjunction with other structural features designed to provide additional water to Taylor Slough while maintaining currently authorized flood control. The lands to be removed from the park occur in the park expansion area along the boundary north of S-332 D and the lands to be considered for addition are lands within the state owned Southern Glades Wildlife and Environmental Area (SGWEA).

I was contacted by Jon Moulding of the Corps and later requested by Dave Sikkema of ENP to develop criteria, perform an evaluation, and make a recommendation. An additional configuration, depicted as Alternative 4, was proposed by the Florida Fish and Wildlife Conservation Commission (FWCC) during a meeting with ENP, the U.S. Fish and Wildlife Service (USFWS), and the South Florida Water Management District (SFWMD) on 27 May 1999. A preliminary evaluation of these four alternatives was provided in a report dated 9 July 1999. In November of 1999 the South Florida Water Management District (SFWMD) proposed an additional land exchange alternative (Alternative 5) for consideration. All five alternatives are now evaluated below.

CRITERIA

The following preliminary criteria were initially identified and investigated:

1. Continuity

Land that is contiguous to the existing park boundary is more desirable than land that is disjunct. This information was obtained from the Southern Glades, Project Features and Sparrow Habitat Land Swap Alternatives map (30 April 1999) provided by the Corps and from the Royal Palm Ranger Station SE 7.5' USGS orthophotomap.

All five of the alternatives proposed are contiguous with the park boundary.

2. Invasive exotic plants

Land that has the least amount of invasive exotic plants such as *Schinus terebinthifolius* (Brazilian pepper), *Casuarina spp.* (Australian pine), etc. is the most desirable. This information was obtained during a helicopter flight with park botanist David Jones, Jim Boggs of the USFWS, and myself on 27 May 1999, and from "A Summary Assessment of the Current Ecological and Hydrological Conditions in the Model Lands Area of Southeastern Dade County, Florida" prepared by John C. Ogden and Robert J. Fennema, SFNRC, ENP, in August of 1995 (this assessment included the Southern Glades Wildlife and Environmental Area).

In general there is a pattern of increasing proportions of exotic plant invasion as one travels from south to north, and from west to east, across the SGWEA. Thus, in general the most disturbed areas of vegetation are across the northern and eastern portions of the SGWEA. All five of the alternatives proposed are in the western and southern portion of the SGWEA, in areas least disturbed by invasive exotic plants.

Alternative 1 appears to include the invasive exotic plants, *Schinus terebinthifolius* (Brazilian pepper) and *Casuarina spp.* (Australian pine), along the short east-west canal to the north. Alternatives 2, 3, 4, and 5 do not appear to include invasive exotic plants. Alternative 3 includes some mixed hardwood vegetation, dominated by *Metopium toxiferum* (poisonwood) but apparently no invasive exotic plants, along the Aerojet road and canal. The Florida Game and Fresh Water Fish Commission has removed what appears to be a significant amount of *Casuarina spp.* along the Aerojet road.

3. Development

Land that has the least amount of existing development (e.g. roads, canals, buildings, etc.) is the most desirable. This information was obtained from the Southern Glades, Project Features and Sparrow Habitat Land Swap Alternatives map (30 April 1999) provided by the Corps, from the Royal Palm Ranger Station SE 7.5' USGS orthophotomap, and during a helicopter flight on 27 May 1999.

Alternatives 1, 2, 4, and 5 do not include any substantial development. There are three active hydrological monitoring stations and one inactive station located in the southwest corner of Alternatives 1, 2, 4, and 5. The active stations are EVER5A, EVER5B, and G3353. These stations are currently maintained by the USGS and according to Mark Stewart of the USGS Miami office, these stations are accessed by helicopter four times per year, more frequently if

problems arise. According to Kevin Kotun of the South Florida Natural Resources Center (SFNRC), ENP, the existence of hydrological monitoring stations on lands being considered for inclusion into ENP should not in any way influence the decision as arrangements will be made for their continued maintenance. He noted that similar situations exist elsewhere in the park. A number of presently “inactive” staff gages also occur along the southern boundary of Alternative 5. Alternative 3 includes developed land (i.e. a portion of the paved Aerojet road and the adjacent canal).

4. Recreational use

Land that has the least amount of existing recreational use is the most desirable. This information was obtained from a 27 May 1999 conversation with Cindy Brashear of the FWCC and FWCC Southern Glades Wildlife and Environmental Area biologist Luis Gonzalez.

According to Brashear and Gonzalez, the FWCC has long-term plans for the Southern Glades Wildlife and Environmental Area. These plans include boat ramps along the Aerojet canal, fishing platforms to facilitate access to the canal, and airboat launching facilities at the end of the Aerojet road near the site of the abandoned Aerojet testing facility. FWCC is very interested in promoting recreational use in the area. Recent conflicts between hunters and trail users (hikers, bikers, etc.) along the C-111 levee Greenway have resulted in the FWCC designating the Aerojet road as the primary hunter access in the future to separate recreational users and reduce conflict. The SGWEA is open to hog and deer hunting, and frogging. It is all “hard hunt” access, with no shooting from airboats and no buggy use at all. Gonzalez estimates approximately 80 hunters per season in the management area and about 15-20 anglers per weekend fishing the canal and “gator” holes in the adjacent marsh. He estimates about 10% of the hunters walk hunt the park boundary to the west of the Aerojet canal. Brashear and Gonzalez suggest that any proposal near or adjacent to the Aerojet road and canal will remove hunting opportunities and increase incidents of trespass on park lands and possibly poaching.

Alternative 1 includes areas currently used for hunting, according to the FWCC. Alternative 3 also includes areas currently used for hunting and fishing, areas that are obviously readily accessible due to their proximity to the road and canal. Alternative 2 and 4 are somewhat removed from the focus of existing and proposed recreational uses in the SGWEA. Alternative 5, while the farthest removed from activities originating at the existing and proposed Aerojet facilities, it is the closest to the existing activities (airboat launching) originating from access along U.S. 1. The SFWMD and the FWCC suggest that Alternative 5 is more consistent with the current recreational boundaries known to the public. They argue that the configuration of Alternative 5 reduces the “stair step” affect of Alternatives 2 and 4 making the area easier to post and the new border easier to police. The SFWMD and the FWCC also suggest that the area encompassed in Alternative 5 has less public use at this time.

5. *Muhlenbergia filipes* (muhly grass)

Land that has the greatest coverage of *Muhlenbergia filipes* (used here as an indicator of favorable Cape Sable seaside sparrow habitat) is the most desirable. This information was obtained from the vegetation data recorded during the 1998 Cape Sable seaside sparrow surveys and from observations made during a helicopter flight with park botanist David Jones, Jim Boggs of the USFWS, and myself on 27 May 1999.

Davis (1943) described the pre-drainage vegetation in the region which now contains the Southern Glades Wildlife and Environmental Area as a broad “southern coast marsh prairie”, with a relatively narrow fringing belt along the coastline of “mangrove swamps”. Based on observations made during the helicopter flight on 27 May 1999, David Jones described the area encompassing alternatives 1 through 4 as predominantly marl prairie dominated by *Cladium jamaicense* (sawgrass) interspersed with scattered *Taxodium ascendens* (cypress) and occasional small cypress heads of apparently good quality. A small portion of the area appears to be mixed prairie with no dominant grass species. Mixed prairies include *Muhlenbergia filipes*, *Cladium jamaicense*, and *Schoenus nigricans* (black-top sedge). The southern portion of the area includes prairies dominated by *Cladium jamaicense* and *Eleocharis spp.* (spikerush), indicative of a longer hydroperiod. Alternative 5 includes areas dominated by sawgrass and spikerush, bayhead swamp and mixed mangrove forests, some scattered dwarf cypress strands and heads, and red mangrove scrub. The sparrow avoids prairies dominated by sawgrass and spikerush, as well as shrubs and trees. These observations are consistent with the vegetation data recorded during the 1998 Cape Sable seaside sparrow surveys.

According to these data, *Cladium jamaicense* is the dominant plant species in Alternative 1. Other species present include *Muhlenbergia filipes*, *Schoenus nigricans*, and *Taxodium ascendens*. The vegetation of Alternative 2 and 4, and the western portion of Alternative 5, is dominated by *Cladium jamaicense*. Other species present include *Taxodium ascendens*, *Eleocharis sp.*, and very occasional *Muhlenbergia filipes*. *Cladium jamaicense* appears to be dominant in Alternative 3 as well, although *Schoenus nigricans* is well represented along with occasional *Muhlenbergia filipes*, and some *Taxodium ascendens*. A small portion of Alternative 3 appears to be mixed prairie with no dominant grass species. The eastern portion of Alternative 5 is not included in the sparrow surveys, as it is not considered even marginal habitat for sparrows.

Although none of the alternatives has a significant coverage of muhly grass, Alternative 3 appears to have the greatest coverage of the four alternatives considered with Alternative 4 and especially 5 having the least.

6. Airboat and buggy trails

Land that does not include existing airboat and buggy trails is more desirable than land that does. This information was obtained from local knowledge, the airboat trail data layer in the GIS of the SFNRC, the Southern Glades, Project Features and Sparrow Habitat Land Swap

Alternatives map (30 April 1999) provided by the Corps, and during a helicopter flight on 27 May 1999.

All of the alternatives being considered, except Alternative 3, include administrative or public use airboat trails. The airboat trails are fairly well defined because in large part they are used regularly by FWCC and ENP personnel. In general, the further west and north you go in the SGWEA the less defined the trails become. In addition, as indicated above, the FWCC has long-term plans to establish airboat launching facilities at the end of the Aerojet road near the site of the abandoned Aerojet testing facility and the FWCC is very interested in promoting recreational use in the area. Those alternatives in close proximity to these facilities may in the future be subject to intentional and unintentional airboat trespass. This is most likely to occur in Alternative 2, to a lesser degree Alternative 4, and the southern portion of Alternative 1. The SFWMD/FWCC considers Alternative 5 the farthest removed from these activities, and therefore the least likely to be impacted by them in the future. However, Alternative 5 is the closest to the existing airboat launching which occurs along U.S. 1. As long as airboat access remains along U.S. 1, the area of Alternative 5 would continue to be subject to airboat trespass to some degree. What the SFWMD and the FWCC have planned for the existing airboat access along U.S. 1 is not known. Regardless of the put-in location (Aerojet and/or U.S. 1), if the SFWMD and the FWCC propose to maintain public airboat access to the southern portion of the SGWEA, then Alternatives 1, 2, 4, and 5 will each require some degree of trail rerouting and signing for public use. The SFWMD/FWCC considers Alternative 5 the easiest to reroute and post, and the easiest to explain to the public.

During our flight of 27 May evidence of buggy trails was more frequent when in close proximity to the road and canal suggesting that alternatives in close proximity to the road and canal would be most impacted by buggy trails. Alternative 3 would be most impacted and perhaps Alternative 1 as well, but to a lesser extent. During the flight of 27 May we did observe some old, apparently one-time use buggy tracks in the area of Alternatives 2, 4, and the western end of 5. The park botanist considered them of minimal significance.

7. Fire management

Land that improves the ability to manage fire is the most desirable. This information was obtained in conversations with EVER Fire Management personnel.

EVER Fire Management personnel suggest that “clean”, uncomplicated boundaries that coincide with natural and/or man-made fire breaks are most desirable. However, irrespective of ownership and the configuration of additional lands, the fire management MOU between the park and the state, and good working relations between the park and the state, already enables park use of convenient fire breaks, such as the Aerojet canal during burning operations.

Of the five alternatives being considered, Alternative 3 presents the most complicated boundary and is the least desirable with respect to fire management. Alternatives 1, 2, 4, and 5 do not significantly improve or impede the park's management of fire.

8. Cape Sable seaside sparrow habitat

Land that has the greatest Cape Sable seaside sparrow breeding potential mean index value is the most desirable. This information was obtained from the ATLSS Cape Sable seaside sparrow mean breeding potential index as determined using the 1995 Base condition.

According to the ATLSS Cape Sable seaside sparrow mean breeding potential index values for the 1995 Base condition, the lands of Alternative 3 have the greatest sparrow breeding potential when compared to Alternatives 1, 2, 4, and 5. This is not surprising considering Alternative 3 includes the highest elevations of any of the alternatives. The ATLSS model suggests that Alternative 1 has a moderate amount of sparrow breeding potential compared to Alternatives 2, 3, and 4. Alternatives 2 and 4 have a very low breeding potential, and Alternative 5 has the least.

9. Existing Cape Sable seaside sparrow use

Land that includes the greatest number of locations where Cape Sable seaside sparrows have been observed in at least one year from 1981, 1992-1999 (survey was not conducted in this area in 1994) is the most desirable. This information was obtained from the Southern Glades, Project Features and Sparrow Habitat Land Swap Alternatives map (30 April 1999) provided by the Corps, and from the sparrow survey database maintained at the SFNRC of ENP.

Censuses for the endangered Cape Sable seaside sparrow in the western portion of the SGWEA reveals the center of activity for this "subpopulation" to be in an area about 18 sq. km of freshwater marl prairie located generally west of the north-south leg of C-111. Alternative 3 is located in this area and subsequently includes the most locations where sparrows have been observed. Alternative 1 includes some locations and Alternative 2 the least. Alternative 4 and 5 essentially include no locations.

10. Designated Critical Habitat for the Cape Sable seaside sparrow

Land that includes the most Designated Critical Habitat for the sparrow is the most desirable.

Initially this was thought to be an appropriate criterion. However, after discussions with the USFWS it was determined that Designated Critical Habitat, either lost to Federal ownership in the C-111 buffer or potentially gained in a land swap is not an issue. According to the USFWS critical habitat incorporated in the buffer zone was addressed in the Biological Opinion and was not considered a problem because sparrows has not used those lands in recent times. As a result of this determination, designated critical habitat will not be used in the alternative evaluation.

DISCUSSION

As a result of further consideration by the NPS in consultation with the USFWS and the FWCC, including a meeting of the park, USFWS, FWCC, and the SFWMD on the afternoon of 27 May 1999, I reduced the above ten criteria to six, for final evaluation, with the following rationale:

(1) In the absence of any requirement, according to the USFWS, to include state owned designated critical habitat of the Cape Sable seaside sparrow into federal ownership, and; (2) in light of the fact that current and proposed FWCC land management practices appear more or less consistent with efforts to provide for the continued existence of the sparrow in the SGWEA; then the above criteria associated with the sparrow (criteria 5, 8, 9, and 10) appear of minor importance. Therefore, the only criteria that appear to have significant weight are as follows: (1) continuity, (2) invasive exotic plants, (3) development, (4) recreational use, (6) airboat and buggy trails, and (7) fire management.

Of the five alternatives proposed, the addition of lands in the southern portion of the Southern Glades Wildlife and Environmental Area (Alternatives 2, 4, and 5) appears to best satisfy the above six criteria. Alternatives 2, 4, and 5 are obviously contiguous with the park boundary. No invasive exotic plant species were observed in these areas during a reconnaissance helicopter flight by park botanist David Jones on 27 May 1999. These areas include no development except hydrological monitoring stations. Alternatives 2 and 4 are most removed from the focus of existing recreational airboating in the SGWEA (the put-in at U.S. 1). Alternative 5 is the most removed from existing recreational users originating from the Aerojet property and most removed from proposed recreational facilities and uses planned for the Aerojet property. However, Alternative 5 is closer to the present focus of recreational airboating in the SGWEA. (These recreational uses generally include activities not permitted on park lands (e.g. hunting, airboating, etc.). The lands in these alternatives (2, 4, and 5) include existing airboat trails. Alternatives 2, 4, and 5 will each require some degree of trail rerouting and signing for public use. The SFWMD/FWCC considers Alternative 5 the easiest to reroute and post, and the easiest to explain to the public. The SFWMD/FWCC also considers Alternative 5 to have the least negative impact on the recreational opportunities that the public has come to expect from the SGWEA. During the flight of 27 May we did not observe any evidence of significant buggy use in the area of these alternatives. Alternatives 2, 4, and 5 do not significantly improve or impede the park's management of fire.

The other alternatives considered fail to satisfy one or more of the six criteria. For example the configuration of Alternative 3 includes developed land (i.e. a portion of the paved Aerojet road and the adjacent canal). According to the FWCC, this alternative includes areas currently used for hunting and fishing, areas which are obviously readily accessible due to their proximity to the road and canal. During our flight of 27 May evidence of buggy use was more frequent when in close proximity to the road and canal. Alternative 3 also provides a more complex boundary with respect to fire management.

While the configuration of Alternative 1 does not include developed land, it too includes areas currently used for hunting and fishing, according to the FWCC. Not only would Alternatives 1 and 3 remove more recreational opportunities than Alternatives 2, 4, and 5, but the proximity to (and inclusion of in the case of Alternative 3) the road and canal will likely increase incidents of intentional and unintentional trespass and an accumulation of negative impacts to park resources (e.g. poaching, vegetation impacts from mechanized vehicles, etc.). Although considered manageable, Alternative 1 does include the invasive exotic plants, *Schinus terebinthifolius* (Brazilian pepper) and *Casuarina spp.* (Australian pine), along the canal to the north.

SUMMARY AND RECOMMENDATION

Of the three alternatives (2, 4, and 5) which seem to best satisfy the six criteria, I suggest that a configuration as depicted in Alternatives 4 or 5 would further remove the potential for intentional and unintentional trespass by hunters and mechanized use originating from the end of the Aerojet road and canal. Of the two, Alternative 5 probably has the least negative impact on recreational opportunities in the SGWEA, is more consistent with the current recreational boundaries known to the public (therefore easier to explain and more likely to be complied with), and the SFWMD/FWCC expects Alternative 5 to be easier to post and patrol. Alternative 5 will require some degree of trail rerouting and signing for public use.

In summary, I recommend Alternative 5 as the preferred alternative of Everglades National Park, with the stipulation that should the SFWMD/FWCC elect to provide airboat access to the north of these lands, sufficient signage be provided.

C-111 Land Swap - Draft Evaluation and Recommendation
1 February 2000

