

Miami Blue Chapter

North American Butterfly Association

August 10, 2007

Dan B. Kimball
Superintendent
Everglades National Park
40001 State Road 9336
Homestead, FL 33034-6733

**Re: General Management Plan/East Everglades Wilderness Study (“GMP”) for
Everglades National Park (“ENP”)**

Dear Superintendent Kimball:

I am writing on behalf of the Miami Blue Chapter of the North American Butterfly Association. We would like to comment on what we believe to be the preferred alternative with respect to the GMP, and to offer some additional observations not addressed in any of the proposals. Our comments are as follows:

1. We support Alternative D. We encourage the National Park Service to consider the most wilderness-inclusive alternative. We believe this alternative will better protect the “wildness” of the Everglades, to the extent it remains, for future generations.
2. We are concerned about the existing speed limits on the roads (specifically the Main Road to Flamingo) in ENP. We believe the existing speed limit is too high and that it is not strictly enforced. We are particularly concerned about the collateral damage, i.e. roadkills, of both vertebrate and invertebrate fauna. There is no excuse for this carnage, especially if the main purpose is to facilitate the “taking” of other resources in the ENP.

We are not aware of any traffic (specifically speed limit) studies performed by (or on behalf of) the National Park Service for ENP, so our observations are personal in nature. Nevertheless, until a comprehensive study is performed and rules are designed and enforced in this regard, we would encourage an immediate reduction of the maximum speed limit on the Main Road to 40 mph.

3. We are particularly concerned about anti-mosquito spraying in ENP, especially (i) the use of inappropriate adulticides, (ii) the lack of a current pesticide management plan, (iii) the apparent lack of compliance with the federal National Environmental Policy Act for such spraying activities, and (iv) the apparent casual manner in which records of what, where and when adulticide/pesticides are used in ENP.

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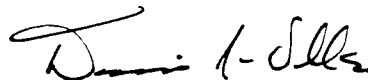
Before any pesticides are applied in ENP, we would expect not only full compliance with the applicable federal law, but a set of well-thought-out (and currently-maintained) policies to effectuate such compliance.

We have previously expressed our concerns in this regard to the Superintendent of ENP by letter dated November 13, 2006. The only written response was to furnish a 1980 written policy relating to this issue; neither that response, nor the apparent lack of a coherent, meaningful current policy is acceptable.

4. We have repeatedly expressed our concerns regarding the burn program as presently implemented in and around the Long Pine Key area of ENP. Our concern has been heightened by the recent decision to name the Florida Leafwing and Bartram's Scrub-Hairstreak as "candidate species" for listing as federally-endangered species. Most recently, we have been in communication with ENP's Deputy Superintendent and the head of ENP's biological Resources branch and we are encouraged by what appears to be both concern and cooperation in this matter; however, too much has been left to chance. We do not believe the burn program being currently employed to maintain the necessary fire regime in the subject pinelands to be sufficiently workable nor as finely-tuned as it should be. We have repeatedly offered our help in this regard, especially as it relates to surveying disappearing butterfly species.
5. Finally, we would encourage you to review our earlier written comments regarding right-of-way mowing, especially along certain side roads off the Main Road, e.g., road to Mahogany Hammock. There is a significant amount of butterfly habitat that is routinely destroyed by unnecessary and/or untimely mowing. This can be important butterfly-interpretive habitat for visitors to ENP. By their very nature these roadsides are readily-accessible and allow for relatively quick identification of resident butterflies. As previously-stated, our Chapter is prepared to partner with ENP to offer, from time-to-time, interpretive services to the public (or education services for your rangers). We note that these efforts would be consistent with "the spirit" of Alternative D.

We welcome your response.

Sincerely,



Dennis J. Olle
President, Miami Blue Chapter