

May 10, 2021

Re: Cayo Costa Mismanagement

Dear ARC Member

I am a 45 year resident of S.W. Florida and my entire professional career has been in environmental planning, permitting and restoration. I was shocked when I learned what is happening at Cayo Costa State Park. A commercial use is being allowed at the most fragile and vulnerable part of the island, The Narrows. A private, for profit concessionaire is bringing thousands of people per month to the south dock. With no park staff and no facilities at this location, the beach dune is being trampled along with impacts to endangered species habitat. Most troubling is the apparent prop dredging of seagrass habitat. There is no channel access to this part of Cayo Costa which was historically only used by shallow draft private boats and kayaks. In response to this problem the DEP's 2020 Management Plan drafted last summer originally contained the following language:

*"South Dock / Southern Gulf Beach Access: In 2016, the existing bayside dock located near the south end of Cayo Costa was designated for concession boats. **Visitor use impacts to the natural communities and shorebird/sea turtle nesting habitat have occurred on the beach side of the trail extending from the south dock, indicating the need for closure of this site for facilitated direct public access.** The dock and trail will be maintained for park support purposes only. As permitted in other remote areas of the park, this southern portion of the park will remain accessible for visitors by hiking or other authorized means from the Gulf, such as self-guided boating or paddling. **Reduced visitation at this site is expected to result in gradual recovery of the observed impacts. Due to resource impact concerns (i.e., seagrass beds and mangrove swamp) and poor navigability of the shallow waters along this segment of the island,** alternative locations for a southern concession dock and beach access trail were determined infeasible. As additional parcels are acquired, depth conditions change, and new navigational information becomes available, alternative access points may be evaluated. Concession ferry access will continue to be facilitated through the docks at Pelican Bay."*

Now in a complete reversal, DEP staff has seen fit to abandon the above language. When questioned regarding this reversal, DEP staff has responded thusly:

"... the DRP conducted an environmental assessment and visitor satisfaction survey, which found only minimal evidence of the reported ecological impacts or disregard for park rules. Instead, the assessment affirmed the value of this point of access for approximately 12,000 visitors per year who would otherwise not be able to experience this scenic and tranquil destination. Given the findings, the draft plan calls for continuation of the same beach access via the south dock that has been offered by the park for years."

It gets worse. A public records request has revealed the following-

* The "environmental assessment" consisted of one DEP staff person visiting the site on March 9, 2016 to take photos plus other visits with no written documentation or anything that appears to be an "environmental assessment."

* A "Resource Monitoring Plan" was formulated to survey, post and protect shorebird and sea turtle nests at the narrows. Such a plan was not produced via public records request leading me to believe none of these things have been done.

The most vulnerable part of Cayo Costa Island is frequented by endangered sea turtles and shorebirds without proper monitoring or protection. It is my understanding the turtle nests on the south end of the island have not been protected since 2017. The DEP is allowing uncapped numbers of visitors without monitoring impacts, including impacts to seagrass in the shallows on approach to the south dock with 45' boats multiple times per day.

If the commercial use of The Narrows were subject to current state and federal permitting it wouldn't be allowed. At a minimum the following questions would have to be answered-

- * Where is the science based "Environmental Assessment" of impacts to resources?
- * What are the impacts of 12,000+ visitors each year on the adjacent Faulkner Calusa Mound Complex?
- * How much sea grass and other benthic habitat has been damaged/destroyed by the 45' tour boats operating in the shallows behind Cayo Costa?
- * Where is the monitoring data regarding impacts to the dune structure and to endangered sea turtle and shorebird habitat?
- * What permitting and mitigation has been done regarding impacts to the sea grass and mangroves?
- * Are impacts to manatees utilizing the shallows behind Cayo Costa being monitored?
- * Where is the Carrying Capacity Analysis that supports the commercial use of the least resilient portion of the island?
- * What are the specifics of your efforts to "...diligently monitor for any ecological impacts to ensure protection..."?
- * What are the impacts to private boaters who no longer are able to use the public dock connected to public lands at The Narrows?
- * Why did you publish this last year and suddenly retract this statement? "... Visitor use impacts to the natural communities and shorebird/sea turtle nesting habitat have occurred on the beach side of the trail extending from the south dock, indicating the need for closure of this site for facilitated direct public access."?

The DEP's obvious neglect surrounding the commercial use at the narrows represents a gross mismanagement of this unique and irreplaceable resource.

For decades park concessionaires have brought visitors to the main dock at Pelican Bay and to the island via dispersed beach landings. Therefore, with appropriate alternative access points there is simply no reason to continue the inappropriate commercial use at the Narrows. Selling out the island's resources is poor management at best.

The DEP's admitted impacts to Cayo Costa State Park's resources are in violation of the state's responsibility to manage and protect this critical habitat for future generations. In order to fulfill the state's mission to protect this resource I ask that the above original 2020 management plan language be reinstated. Thank you.

Respectfully, Dick Anderson