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**Secretary Deb Haaland
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June 10, 2024

I am opposed to any designation of wilderness areas within the Big Cypress National Preserve for the following reasons. (I will not address the congressional history and intent in the Preserve's establishment as I know that you are aware of it.)

My long history of involvement with Big Cypress pre-dates the establishment of the Preserve. I was involved in getting the State of Florida to declare the Big Cypress region an Area of Critical State Concern under Chapter 380.0, the first area designated by the State of Florida. Along with many others I supported and worked to help establish what became the Big Cypress National Preserve in 1974. The establishment of the Preserve was a compromise between the many different interests involved. Had we not reached a compromise, there would not have been this first Preserve established.

The National Park Service had no previous experience with managing a Preserve. Unfortunately, NPS was not provided with a management manual or guidebook on how to manage a Preserve, so for many years NPS has tried to manage the area as a park, not as a Preserve. In September 1981 I was appointed as the Conservation Representative to the Big Cypress Swamp Advisory Committee by Governor Bob Graham's administration. The committee dealt with oil & gas exploration, access roads and oil pads in the Big Cypress region. The committee reported directly to the Florida Governor and Cabinet with their recommendations. In September 1995 I was reappointed during Governor Lawton Chiles administration to the committee.

In June of 2007 I was appointed as the “representative of the environmental advocates” by Secretary of Interior Dick Kempthorne to the Big Cypress National Preserve Off-Road Vehicle Advisory Committee. Our charge was to examine and make recommendations regarding the management of Off-Road vehicles in BICY. In June 1910 I was reappointed environmental representative by Secretary of the Interior Ken Salazar. I mention some of my years of volunteer experience in Big Cypress so that you will have a better understanding of why I feel that a wilderness designation is not advisable.

The enabling legislation required that the Preserve determine in a five-year period any possible areas that might be designated as eligible for wilderness. I attended the first and second five-year review meetings and no areas in Big Cypress were determined to be wilderness eligible. There is no reason to declare wilderness in the Preserve as much of the Preserve is undeclared wilderness. Years ago, inside the Loop, Deep Lake, Airplane Prairie and parts of the Stairstep were closed to any vehicular access without any scientific basis. These areas including the Addition Lands are de facto wilderness.

A wilderness designation will become a management burden for National Park Service staff based on what has occurred on other NPS lands. Exotic plants, trees, prescribed fire, wildfire control and pythons which have devastated native wildlife in ENP and the Preserve. Staff must be free to act quickly without concerns about permitting and possible new litigation from outside groups who do not accept that this wonderful area is a preserve, not a park.

Past litigation has frequently prevented staff from being able to give their attention to vitally important Preserve management issues. Instead, they must spend time dealing with sometimes frivolous lawsuits to the detriment of the natural areas management.

Public access and enjoyment. Much of the Preserve is already closed. Example being what was to be a 60-day closure of the Secondary Trails in the Preserve after a previous litigation in 2014 to show the judge “good faith” efforts by NPS. NPS staff promised to reopen those secondary trails

once NEPA scoping process was completed. In one month, it will be ten years since these Secondary trails were closed to all use. (July 2014).

Please, let's not make the management mistake of declaring any wilderness in Big Cypress National Preserve. It's not wise or necessary and will only serve to complicate management by the NPS field staff. Wilderness designation is desirable and necessary in some public lands managed by the NPS, but NOT in this Preserve. Thank You.

**Respectfully,
Franklin Adams**

