

April 8, 2016

The Honorable Sally Jewell
Secretary
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Jewell:

We, the undersigned, are scientists united in our concern over the seismic testing for oil and gas proposed to take place in Big Cypress National Preserve in Florida. We believe that this activity represents a serious threat to the flora and fauna of the park, but that neither the National Park Service (NPS) nor the U.S. Fish and Wildlife Service (USFWS) has adequately studied the potential impacts.

The National Park Service is considering allowing four stages of seismic testing in Big Cypress, eventually covering more than 360 square miles of wetlands and forest. The first stage of the proposal would cover more than 110 square miles of the Preserve. It would involve the construction of five separate staging areas-- four of which are in wetlands, and the off-road usage of heavy "vibroseis" trucks and other off-road vehicles in pristine habitat, likely creating well over 1,000 miles of new disturbance.

Based on our knowledge of the south Florida ecosystem, the environmental impacts of this project will be substantial.

There are eight federally listed and one candidate species recognized under the Endangered Species Act that are known to occur or could occur within the proposed action area, including: the Florida panther (*Puma concolor coryi*), Florida bonneted bat (*Eumops floridanus*), wood stork (*Mycteria americana*), red-cockaded woodpecker (*Picoides borealis*), Audubon's crested caracara (*Polyborus plancus audubonii*), Everglade snail kite (*Rostrhamus sociabilis*), Eastern indigo snake (*Drymarchon corais couperi*), the gopher tortoise (*Gopherus polyphemus*), and the American alligator (*Alligator mississippiensis*). Other federally listed species that are known to occur in the Preserve include the American crocodile (*Crocodylus acutus*), West Indian manatee (*Trichechus manatus*), and the Cape Sable seaside sparrow (*Ammodramus maritimus mirabilis*).

Additionally, there are thirteen species of wildlife that are state-listed or otherwise protected by the state that also occur or have the potential to occur in the proposed action area, including the Florida black bear (*Ursus americanus floridanus*), Everglades mink (*Mustela vison evergladensis*), Big Cypress fox squirrel (*Sciurus niger avicennia*), Florida tree snail (*Liguus fasciatus*), the Florida burrowing owl (*Athene cunicularia*), and several species of wading birds. In addition to its designation as a federal candidate species, the gopher tortoise is state-listed as threatened.

The proposed plan of operations will also adversely impact native vegetation. Eleven major land use types are located in the proposed action area, including cypress stands, mixed-hardwood swamps, sloughs and cypress domes, marshes, hardwood hammocks, old-growth pinelands, and mangrove forests. More than eighty percent of the proposed action area is comprised of wetland habitats. Two federally-listed plants — Florida prairie-clover (*Dalea carthagensis floridana*) and Florida pineland

crabgrass (*Digitaria pauciflora*) — and 96 state-listed plants occur have the potential to occur within the survey area.

Seismic testing may impact these species and a variety of other mammals, birds, fish, invertebrates, and flora. Potential effects from exploration operations could include increased displacement, increased risk of mortality, decreased reproductive succession, and increased stress levels from the noise and disturbance associated with nearby seismic activities. These actions are also known to impact wildlife by disrupting mating, nesting, spawning and migration routes, and creating new and long-term use travel corridors for predators. Surface disturbance from vehicles could cause localized soil compaction, which could increase runoff of surface waters and accelerate soil erosion and increases the potential for the introduction and exacerbation of exotic and nuisance plant species.

Despite these threats, neither NPS nor USFWS has taken a hard look at the direct, indirect, cumulative, or future effects of the proposed action on protected species and other important wildlife in the Preserve their habitats, or the overall ecosystem. Assertions from project proponents that no long-term impacts to wildlife will occur as a result of the proposed action are not comforting as they are not based on thorough scientific analysis. In addition, the proposal does not include specific and enforceable written plans designed to avoid harm to species and habitats, and no such plans have been reviewed and approved by NPS and USFWS.

Based on the deficiencies in the current proposal, the lack of adequate scientific analysis, and the potential impacts to unique habitats that are home to imperiled plants and animals, we urge NPS to reject the proposed plan of operations for seismic testing in Big Cypress National Preserve.

Sincerely,

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