

January 15, 2015

Proposed Fee Increase
Superintendent Bengé
Everglades and Dry Tortugas National Parks
40001 State Road
Homestead, FL 33034-6733

Re: Proposed Fee Increases in Everglades and Dry Tortugas National Parks

Dear Superintendent Bengé:

The National Marine Manufacturers Association (NMMA) is pleased to provide the National Park Service (NPS) with the following comments with respect to the proposed fee increases in Everglades and Dry Tortugas National Park issued on December 5, 2014. We have serious concerns regarding the fee proposals' impact on recreational boating in the park, and appreciate the opportunity to offer the following comments.

By way of background, NMMA is the leading recreational marine industry trade association in North America, representing 1,400 boat, engine, and accessory manufacturers. NMMA members collectively produce more than 80 percent of the recreational marine products sold in the United States, with a total economic impact of \$121.5 billion. Florida is the number one boating state in the country with an annual economic impact from the recreational boating community of \$10 billion. Recreational boating in the 26th Congressional district, which encompasses Everglades National Park, has a \$525 million economic impact—creating more than 4,000 jobs in the district alone.

While NMMA respects the NPS's review and analysis of existing user fees, we oppose the increased fees and boating permits as we believe they are onerous and discriminatory for the boating public. Like much of South Florida, the Everglades is home to a thriving recreational boating and fishing community for locals and tourists alike. The new fees, as proposed, will impose a disproportional impact on the recreational community, and significantly deter park visitors from experiencing the Everglades and all its natural beauty.

Increased Fees

As proposed, the increase fee for a permanent resident purchasing an annual vehicular park entrance pass and an annual boat ramp launch fee will increase 76 percent. For a short-term visitor, such as a tourist, the fee would increase 233 percent. Additionally, these increases do not take into account any other fees incurred by the public for different activities within the park.

User Fee	Existing Price	Proposed Price
Park Annual Pass	\$25	\$50
Annual Boat Launch**	\$60	\$50-\$100
Vehicle Entrance Fee (7 day)	\$10	\$25
Boat Launch (7 day)**	\$5	\$25

**Currently, a boater can purchase an annual boat ramp fee for \$60, or a one-time launch fee of \$5.

These increases will discriminate against boaters, particularly short-term visitors. The Everglades National Park is one of the world’s premier tourist destinations; by charging exorbitant usage fees, the park will deter tourists from visiting and experiencing its unique ecosystem and waterways. Additionally since tourists come to South Florida for its plethora of recreational activities, many would not benefit from a week-long permit—as they would likely only spend one to two days in the Everglades National Park during their trip. The less expensive, one-day fee, as currently implemented, is more feasible and affordable for the park’s many temporary visitors.

For local boaters who purchase annual permits, the fee increases seem unnecessary and exorbitant. Already annual visitors are spending \$85 to enter and launch a boat in the Everglades—which is significantly more than the costs incurred at other national and state parks. The increased price could drive Florida residents rather to the many nearby local alternatives, where costs are insignificant or non-existent.

It is also not clear as to why the boating fees will be significantly increased or how the new permit requirements will be enforced throughout the park. The current fee addresses boater’s use of the park’s launch ramps, but as proposed, the new fee will impact all boaters no matter how they enter the park’s waterways, or what park infrastructure they use. This would be akin to charging boaters who enter Biscayne National Park or the Florida Key Sanctuaries no matter if they entered from the Atlantic Ocean, Biscayne Bay, Card Sound, Caribbean Sea or Florida Bay. Enforcement of fee collection from non-boat ramp entering visitors is unclear in the current proposal.

NMMA can support reasonable user fee increases if they are fully justified and if the fee itself goes towards improving the waterway and boater experience. This proposed fee does little to justify the intended use. Increased navigational markings, improved boat ramps, and waterway/habitat restoration can be valid justifications for slight fee increases when properly attributed. The Park has done little to justify the reason for the significant jump in boater fees and how the proposed fees will be allocated.

Mandatory Education

As proposed, the new boater permit will be linked to an online boating education system. If implemented this will add additional barriers to access for all boaters. NMMA supports

mandatory boater education initiatives implemented at the state level; we believe that the proposal to create a federal education requirement on a park-specific basis is misguided as it will counter existing Florida law, discriminate against short-term visitors, and set an unwarranted precedent.

Florida law requires boater education for operators born on or after January 1, 1988. By linking permits with mandatory boater education for all operators—regardless of age—the Park Service is implementing a plan contrary to state law. NMMA believes the education requirements should remain under the control of the state of Florida and if the Park see's areas for improved education, work with the Florida Fish and Wildlife Conservation Commission to improve overall boater safety programs.

If the Park has concerns over boating in the Everglades, then more ecosystem and operational training is needed that will better educate boaters, and make them more aware of the park's protected areas. This could include voluntary information inside the park, improved maps and navigational markings and working with the state and relevant agencies to improve current state educational laws and programs. Mandatory education is not the only means to improve overall boater operation within park waters.

Additionally, short-term visitors, either tourists or infrequent users, who were born before 1988 are likely to not have completed a boater education class in the state of Florida. Thus creating a new education requirement, servicing as a barrier to access and deter temporary visitors from entering the park.

Finally, the proposal would also set an unwarranted and unmanageable precedent—establishing a federal agency as an arbiter of boater safety. This could lead to a series of complex jurisdictions where boaters need to meet different requirements depending on where they are on the water across the county.

Numerous question remain over the management and enforcement of this education requirement. How will the education be implemented? Would it be offered on-site so visitors are not turned away? Would there be an online option? Would there be costs associated with the program? What would be the length of the program? What if a visitor has an out-of-state boating license, would that satisfy the educational component? These are just some of the questions that needed to be addressed before such a significant proposal is enacted. We urge the Park Service to better inform and include stakeholders in the decision making and implementation process.

While NMMA understands the importance of boater safety, this mandatory education proposal tied to a required boating permit is not fully justified. It lacks needed explanation and program details, acts as a barrier to boating, and creates an unprecedented, complex education system.

Recommendations

Despite our objections to the proposed fee increases, NMMA hopes to work with the NPS to achieve compromises that allow the park to evolve without deterring the public from visiting. As such, NMMA recommends that the NPS makes the boater fees more affordable for year-round and short-term users.

Specifically, in addition to a 7-day boating permit, visitors should maintain the option to purchase a discounted one-day pass to enjoy the park on a more temporary basis. For annual boating permits, NMMA proposes establishing a discounted package that would combine the park's annual pass with an annual boating permit for one total sum. The monies incurred from the boater permits should go directly to improving navigable waterways.

NMMA recommends that the NPS works with existing stakeholders and law enforcement to ensure sound boating practices. Rather than implement a wholly separate educational requirement, NPS is better served improving voluntary tools and strengthening state boater educational requirements. Should park specific boater education be required, an on-site program should be made available to avoid turning away any potential boaters. Additionally, education waivers should be available to boaters who already have a valid boater education card from any state.

Recognizing the uniqueness of the Everglades ecosystem, NMMA also encourages voluntary education programs to be made available, such as the "Eco-Mariner Program," which can be utilized to further educate visitors on the importance of sea grasses, and other environmental protection methods that support the vitality of the park. Improved maps and navigational markings will go a long way towards better usage and stewardship of the Everglades.

Conclusion

NMMA appreciates the opportunity to comment on the NPS's proposal to increase fees in Everglades National Park—an important conversation about the future of one of America's national treasures. NMMA is hopeful that the Park can implement fair and reasonable fee adjustments that do not discourage boaters and potential boaters from experiencing the Everglades.

It is our goal to work with NPS and other stakeholders on this proposal, along with the draft GMP and in other Park management dialogues, to ensure that recreational boating remains an integral and vibrant component of the park's fabric, while continuing the industry's proud tradition of safety, education and conservation. Should you have any further question please do not hesitate to contact me at nvasilaros@nmma.org and/or 202-737.9763.



Sincerely,

T. Nicole Vasilaros

T. Nicole Vasilaros, Esq.
Director of Government Relations
National Marine Manufacturers Association