



November 15, 2014, via email

**To:** Enid Ehrbar, DEP Planner <enid.ehrbar@dep.state.fl.us>

**cc:** Donald V. Forgione, Director Florida Park Service <Donald.Forgione@dep.state.fl.us>  
Valinda Subic, Dist. 4 Director, DEP <Valinda.Subic@dep.state.fl.us>  
Ana Gibbs, Director Southwest District, DEP <Ana.Gibbs@dep.state.fl.us>  
Kevin Kiser, Park Manager, Cockroach Bay Preserve State Park <kevin.kiser@dep.state.fl.us>

**Re: Management Plan update for Cockroach Bay Preserve State Park**

Tampa Bay Sierra Club has 2 major concerns regarding **(1)** the Management Plan update for Cockroach Bay Preserve State Park and **(2)** the process of public notification and public participation for that plan update. We ask that you consider our suggested solutions for each problem before finalizing this 10-year Plan.

**(1) The proposed management plan for the Cockroach Bay Preserve State Park does not adequately protect the park and its imperiled species and habitat from infestation of nuisance plants, especially Brazilian pepper, and also carrotwood, Australian pine, cogon grass, and other exotics.**

These invasive plants had been brought under control over 10 years ago (back when Cockroach Bay's uplands were managed together with its submerged lands under one DEP department). At that time, sufficient resources were invested, and efforts were coordinated with Hillsborough County's Conservation Services, successfully bringing the invasive plant populations down to a minimal level that allowed the native habitats to flourish.

This success was difficult to achieve, but it could have been *maintained* with relatively minor measures. Instead, over the last ten years (ever since Cockroach Bay's uplands were moved into a separate department from its submerged lands) this success has been *squandered*—and the investment of public funds along with Herculean efforts of state & county staff which achieved that success have been *squandered*—as the invasive plants have been allowed to grow back to destructive levels.

The importance of controlling exotic plants is highlighted throughout the Management Plan itself which lists exotic plant removal as the essential Management Action for 14 of the imperiled species within the Park (pp. 34-35). The Management Plan acknowledges that exotic plant control is necessary for preservation of habitat and food sources of those threatened species, including Gopher Tortoises, Roseate Spoonbills, Black Skimmers, Snowy Egrets and more.

For the benefit of (a) the imperiled species and other wildlife on these lands, (b) the public use & enjoyment of this popular fishing & recreational destination, and (c) the health of this vital ecosystem of Tampa Bay, it is critical that the spread of invasives is halted now, and quickly brought back down to the level attained over 10 years ago, where it can be maintained economically.

**Suggested change to the management plan:**

The Management Plan notes that 24% of the uplands are now covered with nuisance plants (p. 36), and 138 acres are infested with invasives (p. 48). The section on Natural Communities (pp. 20 – 31) lists 7 distinct natural communities within the Park. Each one describes a “Desired Future Condition” in which “the cover of invasive exotic plant species will be less than 5%.” **This 5% coverage should therefore be the minimum Goal of the Plan’s Exotic Species Management component** (p. 48).

However, Objective A of the Plan’s Exotic Species Management component (p. 48), which is the main action item to achieve the Goal of Invasive Plant Removal & Maintenance, is:

*“Annually treat at least 2 acres of exotic plant species in the park.”*

Given that 138 acres are infested, treating only 2 acres each year is clearly insufficient to meet the “Desired Future Condition” of less than 5% coverage within the 10-year horizon of the plan. In fact, given the exponential rate at which these plants spread, treating only 2 acres each year may well be insufficient to contain the infestation at its current level of 24% coverage!

**Please change Objective A to specify action that will protect this public resource from further harm.**

**Hopefully you can work out the *specific* action needed to reach 5% coverage within 3 years, by specifying something like this:**

*“Treat at least 50 acres of exotic plant species each year for the first 3 years. Once coverage is reduced to the Desired Future Condition of less than 5% coverage, continue removal to maintain or reduce that level.”*

**Alternatively, even something more *general* but goal-oriented such as this would be more effective than the current language:**

*“Reduce invasive plant coverage to no more than 5% throughout the park over the next 3 years, then continue to maintain that level.”*

**Lack of resources is sometimes used as an excuse by government agencies for neglecting their public duty, but it is no excuse for a Management Plan that is a plan for failure.** Your plan should be forthright about the measures needed to protect and preserve the natural resources under your care; and whatever you need to fulfill your responsibility, you should make every effort to get it—from the state, from grants, from volunteers, from public-private partnerships, etc.—and your plan should reflect your intent to do so. If, at the end of the day, you do fail, it should not be because you *planned* to fail.

**(2) The citizens and organizations who care about Cockroach Bay have not been given adequate notice and opportunity to participate in the process of updating this 10-year Management Plan.**

We were told by DEP staff that the only notification about this plan update and its upcoming Public Workshop was a mention on DEP’s website and a notice printed in the *Bradenton Herald* (in Manatee County). However, Cockroach Bay is in Hillsborough County, whose citizens have had no real way of knowing about this plan update at all (unless they happen to visit the DEP website regularly or they read newspapers from other counties?).

Cockroach Bay's uplands, wetlands and waterways are a popular fishing & recreational destination for local residents as well as tourists from outside our area. Hillsborough County citizens and organizations have constantly been involved in the management plans for this area, and we have participated in volunteer efforts of invasive removal, cleanups, and native plantings throughout Cockroach Bay ever since it was preserved. We deserve to be notified and involved in the Management Plan which will govern this publicly owned resource for the next 10 years.

Hillsborough County departments and other Tampa Bay agencies which have historically been partners in coordinating management of the county-owned parts along with the state-owned parts of the whole Cockroach Bay area, should also be involved.

**Notification of this plan update with information about where the Plan can be downloaded online should be printed in a major Hillsborough County newspaper—preferably both the *Tampa Tribune* and the *Tampa Bay Times*, as well as the *Observer News* (a south county weekly). A sign should be posted at the site. The following organizations should also be notified directly and invited to provide comment to this 10-year Plan before it is finalized:**

Hillsborough County Conservation Services / ELAPP  
Hillsborough County Environmental Protection Commission (EPC)  
SWFWMD SWIM program  
Natural Resource Planners in the Hillsborough County Planning Commission  
Natural Resource staff in the Hillsborough County Development Services department  
Agency on Bay Management  
Tampa Bay Estuary Program  
Tampa Bay Watch  
Tampa Bay Sierra Club  
Audubon Florida Coastal Islands Sanctuaries  
Sun City Center Audubon  
Ruskin Community Development Foundation  
SouthShore Chamber of Commerce

**Please extend the time for public comment and provide notification to the parties who have always been involved in Cockroach Bay. Please hold all future meetings concerning Cockroach Bay in south Hillsborough County, convenient to the most interested citizens.**

Sincerely,

A handwritten signature in black ink that reads "MARIELLA SMITH". The letters are cursive and somewhat stylized, with the first name being larger and more prominent than the last name.

Mariella Smith  
Executive Committee member, Tampa Bay Group, Sierra Club