

November 13, 2007

Nathan Rezeau
City of Jacksonville
851 N. Market St.
Jacksonville, FL 32202
via email to nrezeau@coj.net

Re: Proposed Management Plan for Huguenot Memorial Park

Dear Mr. Rezeau:

Thank you for this opportunity to comment on the City of Jacksonville's draft management plan (version circulated via email 12 October 2007) for Huguenot Memorial Park. As you know, Audubon has been very concerned with the management of this site for more than fifteen years, largely regarding the impacts of current recreational uses on the significant wildlife resources of the park and adjacent sovereignty submerged lands. Similarly, our members have shared the concern of the general public for the safety of pedestrians at Huguenot in such high traffic situations. We congratulate the city for finally beginning to address these management challenges in this plan, and look forward to working with you to improve it further before submittal to ARC early next year. Specifically:

- (1) Some members of the advisory group on November 8 suggested the city might consider pursuing a federal Incidental Take Permit for impacts to listed wildlife species as a result of the city's management. Audubon would oppose this action because we feel (a) threats to wildlife can and should be ameliorated through management and enforcement actions, rendering an ITP unnecessary, (b) the habitat conservation plan requirements of an ITP would likely prove more onerous to historical users than alternative solutions that could be effected through this management plan, and (c) the city's lease of this park is predicated on its commitment to protecting wildlife species, not applying for permission to take them.
- (2) On page iii, we feel the third paragraph should reflect the park's value to nesting, migrating and wintering species of shorebirds and seabirds, not just nesting birds.
- (3) We would like to see the plan detail a list of staff positions assigned to Huguenot Park, their qualifications and duties, as well as additional needed staff identified by the management tasks proposed in this plan. With the addition of new natural community and wildlife monitoring tasks, as well as previously insufficient levels of rule enforcement, it would be appropriate to address how the city expects to meet the obligations it pledges in this plan.
- (4) At the bottom of page iii, it would be appropriate to include that Huguenot is an incredibly significant wintering site for federally endangered Piping Plovers, as well as addressing its inclusion in a federal COBRA unit as well as its adjacency to federally designated critical habitat for Piping Plovers. The USFWS can likely provide more accurate direction on this.
- (5) On page iv, it would be appropriate for the plan to reflect that Red Knots are currently federally listed as a candidate species, and as such, garner ESA consideration by the USFWS.

(6) Page iv states that the inlet marshes seaward of the bridge are currently inaccessible to the public. The plan would be improved if it addressed how the proposed siting of the new campground will not increase pedestrian access to and likely disturbance of these marshes.

(7) on Page 2, the city describes the uses of the park. Were there any demographic surveys completed? It would be interesting to know what the proportions of recreational interests are at this park, as well as the geographic origin (by zip code, or zip code suffix) of visitors.

(8) Page 2 indicates the park is accessible by boat, however the plan does not address the park's policy on boat landings.

(9) Under "development constraints," we feel insufficient rule enforcement capacity and budget issues should be considered in what uses are feasible.

(10) On Page 5, we disagree with the statement that the city has managed the property according to the purpose for which the property was acquired. The property was acquired to protect its natural resources, and there have been significant wildlife losses under the past (and continuing) management regime. We are optimistic this will change with the implementation of the new plan, but do not want the plan to misrepresent the previous park conditions.

(11) Legislative and Executive Constraints (page 7) might benefit from the addition of the legislative authority of management of listed species as well as the statutory authority for the Critical Wildlife Area in the park's dune interior.

(12) We do not feel that the use of ornamental or non-native species is appropriate in the park and do not understand for what purpose they would be employed over native species (page 12).

(13) Red Knots are not a nesting species at Huguenot. They could easily be replaced in this statement with American Oystercatcher and Wilson's Plover, which bred on Huguenot historically (page 12).

(14) Audubon is pleased that the city will close driving access to the point seasonally, to help protect Red Knots foraging on the inlet bars from vehicular disturbance. This is a tremendous improvement! However, we are concerned that the plan does not address how park staff will limit pedestrian access to these bars during the same time. Pedestrian (often with dog) access to these bars can be catastrophic and is frequent. Moreover, the rip current through the "cut" separating the bars from Huguenot-proper can be dangerously strong and poses a significant liability to the city, regardless of the presence or absence of lifeguards at the point. Despite the fact that swimming here is "not allowed," it is common. This is not acceptable.

(15) Page 17: the species name for Red Knot is *canutus* and the species name for Roseate Spoonbill is *ajaja*.

(16) Page 18: it is not clear to us what the city enforcement presence is in the first full paragraph.

(17) Page 18: The statement about beach driving suggests that the only time beach driving will be permitted in the park is between Memorial Day and Labor Day.

(18) Page 19: Piping Plovers return to Huguenot as early as July.

(19) Page 20: Red Knot should be included under this species listing due to its federal candidate status. More on its population status can be found in the petition for the bird's listing (<http://www.fws.gov/northeast/redknot/riverkeeper.pdf>) or from the USFWS Northeast Florida office. Local birder Pat Leary has previously provided to you seasonal counts for Ft. George Inlet on this migrating species.

(20) Page 21, footnote *b* should indicate SSC=Species of Special Concern

(21) Page 22, will campfires be allowed on the beach outside of sea turtle nesting season? We have concerns for wintering and migratory roosting species on these beaches, and the lack of monitoring/enforcement of these nighttime activities. Historical, nighttime abuse of beach-dependent species and resources by campground patrons suggests this is not an appropriate, allowed activity.

(22) Page 23: The first paragraph places undue emphasis on the value of dunes to Piping Plovers when in fact, the lower beach (intertidal areas) and mudflats are the most crucial resource to this endangered species. While the park's boundaries may not literally encompass the mudflats in the bay, they are predominantly accessed via the park and as such, the city bears a responsibility for adequately addressing their protection in its park management plan. To date, this has not been done sufficiently, but we are hopeful the final draft will include more thorough treatment.

(23) Page 23: we believe as in other rookery parks, raccoon populations amplified by human trash could prove a nest predation issue. Accordingly, the plan might be wise to include provisions for raccoon management, should this become necessary for listed species management purposes.

(24) Page 24: Audubon is not satisfied with this plan's intention to maintain the current leash law. As it stands currently, the city has not demonstrated its ability to enforce this law sufficiently. Without an expectation of enforcement, public compliance has been low, at the expense of easily disturbed species of threatened and endangered wildlife. We have proposed previously if the city feels obligated to provide access for dogs, that it establish a dog beach on the river side of the jetty and disallow dogs from all other portions of the waterfront. This will not only provide important wildlife protections from the significant disturbance dogs pose, but will also improve public safety (reducing the risk of dog bites) as well as ensuring families are not walking barefoot and swimming in areas where dogs are eliminating.

(25) Page 24: Audubon would like to see a balanced representation of the inlet bars on this page. Currently, the plan suggests the bars are an "alarming" burden. While this is true in some ways, they also function as a vital resource for federally listed and candidate species.

(26) Page 25: While Audubon understands the function of the bayside viewing platform as a vehicle exclusion structure, we fear that making it a destination will cause additional problems. The natural instinct will be for visitors to park their vehicles adjacent to the structure, in the sheltered cove near the dune crossover which harbors so many Piping Plovers in fall, winter and spring. If parking is prohibited here, pedestrians accessing the structure will be walking in the busiest driving access lane to the beach, posing public safety concerns. Similarly, we would like to see the barrier moved as close to the base of the cove—near the dune crossover—as possible, to protect as much of the cove from vehicular and pedestrian disturbance as possible. Similarly, the plan does not address what driving will be allowed in the current "family" swimming area. We suggest driving should be eliminated from this area altogether for resource and public safety reasons.

(27) Page 28: While we understand that budgets have not been finalized for all these proposed facilities, we feel it would be appropriate for the city to prioritize in the plan in what order these projects will be undertaken. Similarly, this should be done with current and needed staff positions. Proposed levels of recreational use and structures can then be tied to the availability of these resources (*eg*: if we have *x* level of staff available to enforce it, a leash law would be possible on the Atlantic frontage of the park only).

(28) It is not clear in the plan where the second manned beach entrance station will be located. Similarly, we are not clear why the City is anticipating increasing beach access stations when beach driving access is being reduced.

(29) Page 28: The plan could benefit from a clear demonstration of the number of camping sites currently available and what capacity the new proposed campground could accommodate/replace.

(30) Page 31: In the scenario at the top of this page, it suggests Huguenot's opening would be delayed on days when the tide stage delays establishment of driving lanes. It would seem appropriate to open the park at its ordinary time, but simply not allow beach driving until the tides can accommodate it. High tides should not pose a hindrance to those users interested in parking in the day use areas and accessing the beach on foot. In fact this may be a very desirable scenario for some users who prefer the beachfront without traffic.

(31) Page 31: We applaud the suggestion that a shuttle might work for carrying public to the waterfront, and encourage the city to explore other locations such as Grayton Beach State Park in the Panhandle where this strategy is employed. Similarly, if this were made possible, it might be appropriate to shuttle these individuals to a car-free portion of the beach, where they could provide both a buffer between the resource and vehicles, as well as enjoy the vehicle-free beach.

(32) Page 32: Under "Customer Early Alert System," it would be appropriate to indicate how many/which days in 2007 the park was closed due to weather or tidal concerns.

(33) Page 32, last paragraph: The plan should "outline specific requirements for restoring and preserving the property for public education, recreation *and resource protection.*"

(34) While not specifically stated in the lease, the Army Corps is required under Section 7 of the Endangered Species Act to undertake no actions that would be in violation of the ESA. This includes leasing the park to an entity whose management results in take of listed species.

(35) Page 38: It is not clear what kinds of vendors the city anticipates would be contracted at Huguenot. Some examples of past and perhaps desired future vendors would be appropriate.

(36) Page 38: We applaud the stated commitment to train all senior park managers in the Florida Master Naturalist Program.

(37) Audubon would like to see a thoughtful treatment of the educational goals of the park in this plan, not just the active recreational goals. Several of our members have expressed an interest in supporting the park in these educational efforts.

Audubon is very grateful for the city's leadership on this management plan, finally addressing the extraordinary amount of beach driving pressure this parks' resources currently endure. We will continue to support the city's development of this plan on the advisory committee, at public meetings and through written commenting opportunities like this one. Thank you for this opportunity; like the City of Jacksonville, we are committed to making Huguenot Memorial Park the best it can be for wildlife and people to safely coexist.

Sincerely,



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