



IN REPLY REFER TO:

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SER-PC

JUL 23 2008

Memorandum

To: Superintendent, Everglades National Park

From: Regional Director, Southeast Region *Dainelle*

Subject: Flamingo Commercial Services Plan, Finding of No Significant Impact and Statement of Findings

The attached Findings of No Significant Impact and Statement of Findings for the Flamingo Commercial Services Plan are approved.

Attachment

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**National Park Service
U.S. Department of the Interior**

**Everglades National Park
Florida**



Flamingo Commercial Services Plan Finding of No Significant Impact

July 2008



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**EVERGLADES NATIONAL PARK
FLAMINGO COMMERCIAL SERVICES PLAN / EA
FINDING OF NO SIGNIFICANT IMPACT**

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FINDING OF NO SIGNIFICANT IMPACT

Flamingo Commercial Services Plan

Everglades National Park, Florida

The largest developed area within Everglades National Park (Park) is the Flamingo area, located at the southernmost mainland point of the Park, at the end of a 38-mile paved road that extends southwest from the main visitor center near Homestead, Florida. In 2005, the Flamingo area sustained heavy infrastructural damage as a result of two consecutive hurricanes. These storms caused overwhelming impacts to already aged facilities and many of the visitor uses and services in Flamingo had to be shut down or reduced. The Flamingo Lodge, cottages, restaurant, gift shop, and cafe were closed due to the damage caused by strong winds and 6 to 8 foot storm surges from Hurricanes Katrina and Wilma. Historically, Flamingo was the only area providing overnight accommodations, beyond tent and recreational vehicle (RV) camping, to Park visitors.

Due to the loss of available services and accommodations at Flamingo, the National Park Service (NPS) was asked by the public to expedite the process for determining the site's future. As a result, the Park embarked on a planning process in October 2006, through the development of a Commercial Services Plan and Environmental Assessment (CSP/EA), to identify options and make decisions about Flamingo.

The CSP/EA was developed to determine necessary and appropriate commercial services for the Flamingo area in accordance with all applicable laws and policies, while providing a viable long-term business opportunity for the concessioner(s) ultimately selected to operate the facilities. The preferred alternative (Alternative D) was developed considering the public comment received on the draft CSP/EA, which was released for comment without identification of a preferred alternative. Alternative D, which incorporates many of the features of the two action alternatives (Alternatives B and C) that were included in the draft plan, was released on April 11, 2008, for a second public comment period that ended on May 15, 2008. The text that describes the preferred alternative is included in this Finding of No Significant Impact (FONSI). Additional information in support of the preferred alternative – information that required clarification from the documents released in April 2008 or that needed to be included based on comments received – is included in Appendix A. Once approved as the Final CSP/EA, the preferred alternative will be incorporated into the General Management Plan (GMP), which is currently in the planning process and scheduled for completion in 2009. Implementation of the CSP/EA will begin as funding becomes available.

The preferred alternative integrates principles of sustainability in site and facility design and energy conservation and identifies ways to minimize impacts to natural and cultural resources. The preferred alternative will result in minor to moderate, long-term beneficial impacts to several resources, including soils, soundscapes, water quality, wetlands, floodplains, wilderness, wildlife and wildlife habitat, special status species, and night sky (increased lighting), primarily due to the reduction of the developed footprint and the restoration of previously disturbed areas. Visitor use and experience and energy resources will have moderate long-term benefits from the provision of a diversity of visitor facilities and activities provided with sustainability and energy conservation in mind, and there will be short- and long-term benefits to regional socioeconomics from the expected increase in visitation. Adverse impacts will be mostly short-term, negligible to moderate (often associated with construction and demolition), and will include impacts on soils, air quality, soundscapes, water quality, wilderness, wildlife, special status species, and energy resources. Long-term adverse impacts include negligible impacts to the geologic and topographic condition of the site, minor seasonal adverse impacts on soundscapes, minor impacts on water resources and surrounding wetland areas used by visitors, minor impacts to special status species, minor impacts to cultural resources, and minor impacts to Park management and operations, assuming an increase in base funding occurs. Long-term impacts up to a moderate level could occur from increased visitation in wilderness areas (e.g. impacts on the bay bottom), wildlife habitat, and night sky, and to Park

operations if no increase in base funding occurs. Finally, the continuation of use and rebuilding at Flamingo will result in long-term localized moderate adverse impacts on floodplains; however, floodplain impacts cannot be avoided since the entire area is in the 100-year floodplain. A summary of the environmental impacts of Alternative D is provided in Appendix A and a Statement of Findings for Floodplains is attached as Appendix B. Letters of Consultation with agencies responsible for natural and cultural resources are included in Appendix C. Mitigation measures incorporated into the preferred alternative to reduce impacts are contained in Appendix D.

SELECTED ALTERNATIVE

As previously described, the preferred alternative, Alternative D, is the selected alternative. Alternative D consists of a combination of elements from Alternatives B and C of the draft CSP/EA, and takes into consideration public input and the original purpose, need, and objectives of the plan. The components of the preferred alternative are detailed in the Errata (Appendix A).

Like Alternative C, the preferred alternative will provide a mix of commercial services to accommodate a wide range of visitor preferences and needs, with an emphasis on eco-friendly concepts and sustainable design features. The mix of accommodations will reflect the market for a more eco-friendly destination (a single, elevated lodge; elevated cottages; houseboats; ecotents; RV campground with electric hookups; backcountry chickees in Florida Bay), and the numbers and sizes of these facilities will reflect what is likely necessary for profitability by a future concessioner. Like Alternative B, the RV campsite will remain at T Loop, but will be upgraded with electrical hookups. Eco Pond will remain a visitor use area, while the area it occupies will continue to restore itself in the coming years, and an environmentally-friendly swimming pool will be provided as part of the new lodge.

The site design and the redevelopment of the Flamingo area will allow the area to function more efficiently for visitors, the concessioner, and the Park, than it did in the past. The new design will facilitate pedestrian and bicycle access and circulation throughout the Flamingo area. The lodge and cottages will be located in proximity to the marina and visitor center, while the RV campsite will remain at T Loop. A Flamingo circulator shuttle will transport visitors to key destinations within the Flamingo area and a “Yellow Bike” system will provide overnight guests with enhanced access to the marina, restaurant, lodging, and other visitor services, while reducing the frequency of private vehicle use. As a result of this reconfiguration, approximately 50 acres within the Flamingo developed area will be restored to their previous natural conditions, including 28 acres at the former B and C Loops and 22 acres in the old lodge and cottage areas.

Because funding may not be immediately available to support the construction of all the proposed facilities at the same time, the plan may be implemented and constructed in phases. Most likely, the sequence for implementation will be in the following four phases:

1. Houseboats, additional food service in the marina area, backcountry chickees, electric hook-ups for the RV sites, solar hot showers at the camping area restrooms. Flamingo circulator shuttle, additional canoes, kayaks, and bicycles.
2. Cottages, gift shop, and Snake Bight Tram.
3. Ecotent facilities.
4. Lodge (with restaurant, lounge and swimming pool).

A detailed financial analysis for implementing the preferred alternative, including more details on project phasing, is provided in Appendix E.

ALTERNATIVES ANALYZED IN THE ENVIRONMENTAL ASSESSMENT

The draft CSP/EA analyzed the No-Action Alternative, as well as the two action alternatives (Alternatives B and C) described below. No preferred alternative was identified at the time the EA was released for public comment. Following public comment on the draft CSP/EA, Alternative D was developed based on preferred elements from Alternatives B and C and was presented to the public with a full description and analysis of impacts for a separate comment period. The following presents a brief summary of the alternatives considered and analyzed in the CSP/EA, and the elements that are common to all the alternatives (including the preferred alternative).

Alternative A: No-Action Alternative. This alternative is required to provide a baseline to measure the impacts of the action alternatives on Park resources and visitor experience. Concessions at Flamingo will function according to current uses, which primarily focus on day users. Only the campground and limited marina slips will be available for overnight use. Projects that have been approved for emergency hurricane funding (two replacement backcountry campsites, replacement employee housing, replacement maintenance facility and replacement amphitheater) or are necessary to provide current levels of basic services are also included in Alternative A. The locations to rebuild some of the replacement facilities will be changed to better meet resource protection, visitor experience and operational efficiency objectives. The new housing at Flamingo will be rebuilt as elevated structures and will be built to comply with the Architectural Barriers Act Accessibility Standards (ABAAS) and 2004 Florida Building Code for the High Velocity Hurricane Zone.

Alternative B: “Flamingo Rebuilt”. This alternative will create “Old Flamingo” by replacing the concessions and services that existed prior to the 2005 storms at Flamingo and in prior years before staff and budget impacts (e.g., lodge, cottages, restaurant, pool, amphitheater, Snake Bight Tram) but using more modern conveniences and implementing sustainable building practices. Rebuilding Flamingo will re-establish the area as the primary day-use and overnight destination in the Park. The facility layout within the Flamingo area will generally remain the same, and the buildings and services offered will reproduce the “Old Florida” ambiance of the area. The lodge, pool, restaurant, and cottages will be rebuilt and co-located west of the visitor center to reduce the developed footprint. Certain facilities damaged by hurricanes will be rebuilt (amphitheater, NPS employee housing, maintenance facilities, concessioner housing, backcountry chickees). All new housing or accommodations will be elevated structures and will comply with the ABAAS and 2004 Florida Building Code for the High Velocity Hurricane Zone.

Alternative C: “Flamingo Redesigned”. This alternative will provide a “New Flamingo” with a greater variety of structures and services with an eco-tourism focus. A creative set of sustainable principles suited to Flamingo’s particular environment will be used, including site design, energy management, water supply, waste prevention and “green” architecture. The site will be redesigned to consolidate related uses, minimize the need for utility extensions, and facilitate pedestrian and bicycle circulation. Certain facilities damaged by hurricanes will be rebuilt (amphitheater, NPS employee housing, maintenance facilities, concessioner housing, backcountry chickees). All new housing or accommodations will be elevated structures and will comply with ABAAS and 2004 Florida Building Code for the High Velocity Hurricane Zone.

Elements Common to All Alternatives

Several of the elements proposed in the CSP/EA will be common to all the alternatives considered, including the No-Action Alternative and the preferred alternative. This is due to the pending implementation of several reconstruction and restoration projects that are currently funded to replace or restore storm-damaged structures and/or areas within Flamingo, as well as the desire to incorporate sustainable design concepts in any new construction. These elements are described in detail in the CSP/EA (Pages 2-4 to 2-8) and are briefly summarized below.

- Demolition of lodge buildings and cottages.

All lodge buildings and cottages that were severely damaged during the 2005 hurricane season will be removed (the cottages have already been demolished), and portions of the sites restored.

- Restoration to natural conditions of previously disturbed areas no longer needed for facilities.

Any sites no longer needed for replacement of facilities will be restored. The exact type of restoration will depend on the size and location of the area, but will generally include removal of building materials and fill, followed by grading to the historic contour, and control of non-native vegetation.

- Maintenance of marina area, including the fueling stations, marina basin, and marina store.

The marina basin, marina store and fueling stations will continue to operate in their current locations and configurations, generally offering the same services as currently provided.

- Preservation of historically significant Mission 66 visitor center and service station.

These Mission 66 structures will continue to be protected and preserved.

- Reconstruction of amphitheater.

The amphitheater will be rebuilt under all alternatives, although it may eventually be relocated to the most advantageous location within the redeveloped area of Flamingo. The new amphitheater will seat 120 people and occupy approximately 6,000 square feet of space.

- Replacement of hurricane-damaged facilities.

The park will replace the trailer housing at the Flamingo employee housing area, the Flamingo maintenance office/shop and boat repair shop, and two Florida Bay backcountry campsites (Carl Ross and Key, Shark Point) with two in-water chickees. The hurricane-driven emergency replacements for these facilities are included as part of this plan, since they are all integral to the full and efficient operation of Flamingo by the Park and the concessioner. Specific information about each is contained in the CSP/EA.

- Incorporation of 2004 Florida Building Code requirements and design to accommodate effects of potential sea level rise/global warming.

All structures built under any alternative will meet the Monroe County building code requirements, which state that all permit applications received after October 1, 2005, must comply with the 2004 Florida Building Code. Structures constructed at Flamingo will be constructed to withstand hurricanes and gale force winds, and will be elevated (increased landfill, pilings, etc.) to prevent hurricane damage that could occur more frequently as a result of warming ocean temperatures and flooding from sea level rise.

- Incorporation of ABAAS design requirements.

The ABAAS provides accessibility requirements for Federal buildings and programs, comparable to how the Americans with Disabilities Act Accessibility Guidelines serves the private sector. These requirements will be met for all newly constructed facilities.

- Use of Integrated Pest Management (IPM) and sustainable maintenance practices.

Construction and building materials for each of the alternatives will be chosen with IPM and sustainable maintenance in mind. Building plans for new structures will include plans for the use, installation of materials, and design that supports IPM and sustainable practices.

- Incorporation of sustainable design principles.

Sustainable design concepts will be incorporated, particularly in the construction of any new structures. These concepts are designed to minimize environmental impacts and minimize importation of goods and energy, as well as, the generation of waste. Part of this sustainable design initiative will be the use of Sustainable/Leadership in Energy and Environmental Design (LEED) Certified Design Elements for new structures, site layout, site operations, and maintenance. New structures will include the use of environmentally preferable (“green”) building materials, and energy and water saving devices. If site layout is changed or redesigned, the new design will incorporate sustainability by consolidating the uses to maximize pedestrian access, minimize the use of vehicles, and make use of bay breezes for cooling. Maintenance will also follow sustainable practices by using green products for cleaning and following the principles of integrated pest management.

ALTERNATIVES CONSIDERED BUT DISMISSED FROM DETAILED ANALYSIS

The NPS considered and rejected several alternatives during the development of the draft CSP/EA. Brief descriptions of these preliminary alternatives, and their reasons for dismissal, are outlined below.

- **ECO-RESORT**

An alternative with no lodge or traditional rooms and very rustic accommodations was discussed by the Park’s interdisciplinary team as a potential action alternative. However, many of the eco-friendly features envisioned in this alternative were incorporated into Alternative C. Additionally, there were concerns as to whether that type of development, with no traditional housing, will be economically viable for a concessioner. Concerns that this alternative might not adequately serve all members of the public who wish to visit Flamingo also existed. Therefore, this alternative was not carried forward for separate analysis.

- **ALL-INCLUSIVE RESORT**

Constructing and operating an all-inclusive, large resort at Flamingo was dismissed because it did not meet the criteria listed under the necessary and appropriate uses, and it will not meet the mission and purpose of the Park. Therefore, this alternative was not carried forward for separate analysis.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

In accordance with Director’s Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making (NPS 2001), the NPS is required to identify the “environmentally preferred alternative” in all environmental documents, including environmental assessments. According to the Council on Environmental Quality (CEQ) guidelines, the environmentally preferred alternative is the alternative that will promote the national environmental policy, as expressed in Section 101 of the National Environmental Policy Act (NEPA).

Section 1505.2(b) requires “. . . specifying the alternative or alternatives which were considered to be environmentally preferable.” Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources. Section 101 calls for Federal government actions to:

- (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- (2) assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;

- (3) attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- (4) preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- (5) achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Based on the above criteria, Alternatives C (identified in the draft CSP/EA as the environmentally preferred alternative) and D (the preferred alternative) both have advantages and elements that help to meet the above criteria, and all the alternatives considered would fulfill responsibilities for succeeding generations. However, the park has identified Alternative D as its environmentally preferred alternative for the following reasons:

Alternative D includes a wide range of sustainable design elements that would conserve energy and water and minimize waste for generations to come.

Alternative D involves very limited land disturbance and initial construction, which minimizes potential impacts to the Flamingo cultural landscape and other cultural and natural resources that can be adversely affected by noise and ground disturbance. Although Alternative C would allow for a greater amount of site consolidation and restoration, Alternative D includes a large area of restoration as well as minimal land use change to the existing disturbed areas near the visitor center and the RV campground, which will assure pleasing surroundings for future generations and help preserve the important cultural and historic aspects of the previous Flamingo site layout.

Alternative D also meets the criterion of attaining the widest range of beneficial uses of the environment without degradation or other undesirable consequences, with its emphasis on sustainability, energy conservation, and eco-friendly accommodation and services. Alternative D, with its less intense development, will better preserve the important cultural aspects of Flamingo; while, like Alternative C, providing diversity and variety of individual choice.

All of the alternatives would achieve a balance between resource use and population that would permit high standards of living, but Alternative D in particular will allow for a wide sharing of amenities with the provision of overnight accommodations in various locations to accommodate several different groups of the population using the area, as well as expanded services, while providing for resource protection.

Alternative D incorporates many features and operational elements to enhance the quality of renewable resources and approach the maximum recycling of depletable resources, especially with regard to site consolidation, commitment to environmentally friendly facilities, and provision of trails and emphasis on alternative transportation. Alternative C also meets these criteria and has a greater restoration component, but offers less separation of unlike uses, which is accommodated in Alternative D with the provision of alternative transportation for those uses located farther from the marina and Visitor Center areas.

Overall, Alternative D best meets the majority of the criteria listed in Section 101 of NEPA, and is considered the environmentally preferred alternative.

THE PREFERRED ALTERNATIVE AND SIGNIFICANCE CRITERIA

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

Over the short-term, negligible to minor adverse effects will be generated by demolition and construction activities. Wildlife and visitors will be disturbed by activities and noise during construction, soils will be disturbed, and increased sediment could, temporarily, affect local surface water quality. Over the long-term, there will be moderate impacts from increased visitation in wilderness areas (e.g. impacts on the bay bottom), wildlife habitat, and night sky (increased lighting), and to Park operations if no increase in base funding occurs, and the continuation of use and rebuilding at Flamingo will result in long-term localized moderate adverse impacts on floodplains. There will also be long-term, minor to moderate benefits to several resources, including soils, soundscapes, water quality, wetlands, floodplains, wilderness, wildlife and wildlife habitat, special status species, and night sky, primarily due to the reduction of the developed footprint and the restoration of previously disturbed areas. Visitor use and experience and energy resources will have moderate long-term benefits from the provision of a diversity of visitor facilities and activities provided with sustainability and energy conservation in mind, and there will be short and long term benefits to regional socioeconomics from the expected increase in visitation.

None of the adverse or beneficial impacts expected for Alternative D will exceed moderate levels or be considered significant.

The degree to which the proposed action affects public health or safety

The action (Alternative D) will have no significant impacts on human health or safety. The incorporation of the 2004 Florida Building Code requirements and design to accommodate effects of potential sea level rise/global warming will mean that all structures will be constructed to withstand hurricanes and gale force winds, and will be elevated (increased landfill, pilings, etc.) to prevent hurricane damage that could occur more frequently as a result of warming ocean temperatures and flooding from sea level rise. Also, the current facilities at Flamingo have health and safety concerns including being uninhabitable and containing potentially hazardous materials. Planned replacements of these facilities will alleviate these concerns. This will reduce risk related to storm events and produce long-term beneficial effects to public health and safety.

During construction of the proposed facilities, increased accident potential could result from normal demolition and construction actions. All work will be done under an approved health and safety plan, in accordance with applicable Federal, State, and local regulations, limiting any adverse impacts to short-term, minor, levels.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas

The Flamingo area contains Mission 66 structures, and mitigation is included to limit impacts to this aspect of the area's cultural resources. The entire area is considered wetland, and there will be no direct adverse impacts to wetlands. Indirect adverse impacts to wetlands will be negligible to minor at most from visitor uses, and there will be substantial benefits relating to the proposed reclamation of unused areas. The primary project area is already disturbed and has had fill placed where demolition or construction is planned. There are no prime farmlands, wild or scenic rivers, or designated ecologically critical areas in the project area.

Because all of the Flamingo area is in a 100-year floodplain, the proposed commercial services and associated facilities proposed for alternative D must be located in a floodplain; there are no other siting alternatives. The continuation of uses and rebuilding of structures and facilities in the Flamingo area

would result in risks from the possibility of flooding and wind/storm surge damage, with localized adverse impacts on floodplains, but there would be moderate beneficial effects from the consolidation of facilities, elevation of structures to standards described above, use of flood resistant design, and restoration of a large area of previously disturbed floodplain. Therefore, floodplain values would be protected to the maximum extent possible and potential flood hazards would be minimized. Mitigation and compliance with regulations and policies to prevent impacts to water quality, floodplain values, and loss of property or human life would be strictly adhered to during and after the construction (Appendix B includes Floodplain Statement of Findings including mitigation measures). Individual permits with other federal and cooperating state and local agencies would be obtained prior to construction activities. No long-term adverse impacts would occur from the Preferred Alternative. Therefore, the National Park Service finds the Preferred Alternative to be acceptable under Executive Order 11988 for the protection of floodplains.

The degree to which the effects on the quality of the human environment is likely to be highly controversial

Implementation of the preferred alternative will not be controversial. There were no controversial impacts identified during the analysis done for the EA, and no highly controversial issues were raised during the public review of the EA or the preferred alternative.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks

The risks to the quality of the human environment associated with the preferred alternative will be negligible. There will be no highly uncertain, unique, or unknown risks associated with implementation of the preferred alternative. Risks related to hurricane or storm damage will be mitigated by use of elevated structures to withstand hurricanes and gale force winds and to prevent wind or water damage.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration

The preferred alternative neither establishes a NPS precedent for future actions with significant effects nor will it represent a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts

No significant cumulative impacts were identified during the environmental analysis for any of the alternatives.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources

Because there will be limited ground-disturbing activity in previously undisturbed areas, there is potential for this alternative to expose currently unknown archeological resources. There are artifacts and features associated with a late 19th/early 20th century occupation of the community, including significant historic roads and associated canals. There are no known intact prehistoric archeological resources in the project area. Significant historic Mission 66 resources will be preserved. With mitigation, there will be long-term, minor, adverse impacts to cultural resources as a result of implementation of Alternative D. The Florida SHPO concurred that with the Park's commitments to protect and preserve significant cultural resources in the Flamingo area, the preferred alternative, will have no significant impact on historic resources. Appendix C includes correspondence and project commitments from the Park and Florida SHPO.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat

Construction activities under Alternative D will have short-term, localized, minor adverse impacts on Federal and State-listed species, as well as species of special concern. Long-term impacts from visitor use will occur from off-trail use, noise, and the effects of outboard engines on seagrass and other submerged vegetation, as well as propeller strikes, having minor adverse impacts throughout the Flamingo area. There will also be long-term, minor to moderate, beneficial effects from the restoration of previously disturbed areas. On May 21, 2008, the USFWS concurred with the National Park Service's determination that finding that the project "may affect, but is unlikely to adversely affect" listed species found in the project area. On June 19, 2008, the NMFS identified the need for additional consultation on impacts to listed species as project implementation details are developed. The NPS is committed to working closely with NMFS to address all of their concerns during implementation planning and permitting. Correspondence between the Park, the USFWS and NMFS are provided in Appendix C. Construction mitigation commitments by the Park to NMFS are included in Appendix D.

Whether the action threatens a violation of Federal, State, or local environmental protection law

The preferred alternative will not violate any Federal, State, or local environmental protection laws.

Impairment

In addition to reviewing the list of significance criteria, the NPS has determined that implementation of the preferred alternative will not constitute an impairment to the Park resources and values. An impact will be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific park purposes identified in the establishing legislation or proclamation of the Park;
- Key to the natural or cultural integrity of the Park or to opportunities for enjoyment of the Park; or
- Identified as a goal in the Park's GMP or other relevant NPS planning documents.

This conclusion is based on a thorough analysis of the environmental impacts described in the project's EA, the preferred alternative description and analysis, public comments, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies. Although implementation of the project will cause short-term, localized adverse effects, in all cases these result from actions taken to preserve vital Park resources. In many areas, implementation of the preferred alternative will result in benefits to natural resources and the human environment and will increase opportunities for their long-term enjoyment. Implementation of the Flamingo CSP will not result in impairment of the Park resources and values and will not violate the NPS Organic Act.

PUBLIC INVOLVEMENT AND CONSULTATION

Park staff places a high priority on meeting the intent of public involvement in the NEPA process and giving the public an opportunity to comment on proposed actions. As part of the NPS NEPA process, issues associated with the proposed plan were identified during scoping meetings with NPS staff, coordination with other affected agencies, public meetings, and public comment. Scoping and public involvement efforts included a number of open house meetings, press releases, website posting, and dissemination of information and gathering of comment through the internet. Four public meetings were held and are detailed below.

In addition, projects exploring design and funding issues related to the Flamingo CSP/EA were pursued by several organizations. The graduate program at the Yale University School of Architecture and the

Miami-Dade County Design and Architecture Senior High School conducted semester-long projects focused on the sustainable rebuilding of Flamingo, while the National Parks Conservation Association, Suncoast Office, sponsored a design project.

The South Florida National Parks Trust has committed more than \$25,000 in seed money to initiate the rebuilding effort.

PUBLIC SCOPING MEETINGS

Four public scoping open house workshops were held on October 17, 2006, October 26, 2006, October 28, 2006, and November 9, 2006, to initiate public involvement early in the planning stage and to obtain community feedback regarding the initial concepts for the development of the CSP/EA. These meetings were conducted at four different locations: the International Game Fish Association Hall of Fame in Dania Beach, the Key Largo Grande Resort in Key Largo, the Palmetto Golf Course in Miami, and the Coe Visitor Center at Everglades National Park in Homestead. A newsletter was sent announcing the public meetings, meeting information was available at the Coe and Flamingo visitor centers and the marina store, meeting dates were posted on the park web site, as well as a press release, newspaper ads in English and Spanish and an email reminder. In addition, a number of elected officials were notified by letter.

The public scoping meetings were structured as two separate, repeated sessions during each workshop. In addition, informational displays and question-and-answer periods with Park staff occurred with an opportunity to provide comment. The meetings began with small-group/one-on-one discussions and an overview presentation was provided by the Superintendent; the meetings then continued with follow-on small-group/one-on-one discussions. During the open house, the public was able to visit information stations that detailed different aspects of the project and were given the opportunity to make comments on flip charts.

PUBLIC MEETINGS ON THE DRAFT EA

The Draft CSP/EA, with three alternatives, was released for public review on November 17, 2007, and following three public workshops (December 3, 2007, Dania Beach, Florida; December 4, 2007, Miami, FL; and December 13, Key Largo, FL, with the Key Largo meeting also conducted as a live webcast), the comment period ended on January 25, 2008. Based on public input during the comment period and additional park management analysis, a Preferred Alternative (Alternative D) was developed and released on April 11, 2008, for a final 30-day public period that concluded on May 15, 2008.

PUBLIC COMMENT

EARLY SCOPING COMMENTS

The purpose of the public scoping meetings was to solicit input from the community on the purpose, need, and objectives, as well as the preliminary alternatives for the CSP. The NPS provided 45-day public comment period during which the public could participate by mail or on the NPS Planning, Environment, and Public Comment (PEPC) website. The NPS also posted public scoping information on the PEPC website. Issues and concerns identified by the public during public scoping included the following:

- Lodging: With only two exceptions, the public voiced a strong desire to have lodging available at Flamingo.
- Expanded Services: Commenters asked for more educational opportunities, particularly guided tours. Also requested were more rentals, particularly houseboats and bicycles.

- Mosquitoes: Many commenters reminded NPS that Flamingo can be ‘buggy’ and there were many requests that outdoor facilities be screened (e.g., amphitheatre, grills, swimming pool).
- Showers: Many commenters requested hot showers be provided at Flamingo.
- Swimming Pool: The majority of commenters were in favor of a swimming pool; however, several were concerned with constructing and maintaining a swimming pool in a floodplain.
- Food: Suggestions varied from limited groceries at the marina store to a five star restaurant, but most commenters suggested that basic food services be provided.
- Sustainability: The majority of commenters supported using sustainable design to rebuild Flamingo, particularly alternative energy and elevating structures above storm surge. Some commenters worried sustainable design will not include air conditioning.

PUBLIC REVIEW OF THE DRAFT COMMERCIAL SERVICES PLAN/EA

The draft CSP/EA was distributed for a public review and extended comment period that began on November 17, 2007, and ended on January 25, 2008. The draft CSP/EA was made available for public review through PEPC, individual mailings of documents and CDs as requested, and hard copies of the document were placed in local libraries throughout South Florida. Appendix F summarizes the major concerns raised by the public on the draft and the park responses to those. Many of the concerns were focused on the alternative elements, and many of these concerns were considered in formulating the preferred alternative.

PUBLIC REVIEW OF THE PREFERRED ALTERNATIVE

A description of the preferred alternative (Alternative D), which was developed in response to public comment and represented a combination of Alternatives B and C, was released, along with the revised financial analysis and Floodplain Statement of Findings, for public comment on April 11, 2008, for a 30-day comment period ending on May 15, 2008. The PEPC website received 37 comments on Alternative D, many of which commented on the need to build quicker, consider adding more units, and keeping the campground as an NPS operation. These comments and others received on the preferred alternative are summarized in appendix F, along with Park responses.

OTHER CONSULTATION

Coordination with local and Federal agencies and various interest groups was conducted during the NEPA process to identify issues and/or concerns related to commercial services at Flamingo. Letters were sent to the following, and copies of the EA and preferred alternative were made available to more than 3000 individuals and organizations on the project mail and e-mail list.

- Advisory Council on Historic Preservation
- Lehtinen, Vargas, Reiner, and Riedi (Miccosukee Tribe of Indians of Florida)
- Lewis, Longman, and Walker (Seminole Tribe of Florida)
- Miccosukee Tribe of Indians of Florida
- Florida Department of Environmental Protection, S.E. District
- Seminole Nation of Oklahoma
- National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS)
- Seminole Tribe of Florida

- State Historic Preservation Officer, Division of Historical Resources - Bureau of Historic Preservation, Compliance and Review Section
- Florida State Clearinghouse Coordinator, Florida Department of Environmental Protection
- South Florida Field Office, U.S. Fish and Wildlife Service (USFWS)

The SHPO concurred with the Park's Finding of No Effect on properties eligible for listing in the National Register of Historic Places on May 16, 2008, subject to the identified commitments and mitigation conditions that will be carried out through site planning, design and during construction. Correspondence between the Park and the SHPO are included in Appendix C.

Consistent with the requirements of Section 7 of the Endangered Species Act the USFWS and the NMFS were contacted by letter regarding the threatened and endangered species with the potential to occur in the project area, and each agency received a copy of the Draft CSP/EA and the preferred alternative, Alternative D. All correspondence between the Park and the USFWS and NMFS, and the lists of threatened and endangered species under consideration for this project are included in Appendix C. The USFWS replied on May 21, 2008, concurring with the Park's findings of "not likely to adversely affect" for the listed species addressed in the draft CSP/EA. The NMFS responded on June 19, 2008, identifying the need for additional consultation in the future on impacts to listed species as specific elements/projects within the preferred alternative received funding and as implementation details are developed. The NPS is committed to working closely with NMFS to address their concerns during implementation planning and permitting for elements/ projects with the potential to adversely affect species under NMFS jurisdiction, as identified in their June 19, 2008 letter included in Appendix C.

Table F-1: Overview of Preferred Alternative Elements

Included in each element category for the Preferred Alternative (Alternative D) is mention of where the information was derived from: Alternative A, B and/or C, as they are described in the Draft Plan.

| Element | Alternative D – Preferred Alternative |
|--|--|
| Accommodations | |
| Overnight (Includes elements from Alternatives B and C) | <p>Modern overnight accommodations that meet the full range of park visitor needs. Facilities will be sited in a more compact and efficient manner than previously existed. See Figure 1 for Preferred Alternative Site Plan/Layout.</p> <p>Lodge—30 rooms, located in proximity to east end of the old lodge site</p> <p>Cottage units—24 units, located in proximity to the proposed lodge</p> <p>Ecotents—40, located along shoreline in proximity to walk-in and group camping areas</p> <p>Tent camping—130 total sites</p> <p> 55 drive-in sites—Loop A (same as present location)</p> <p> 72 walk-in sites, located in proximity to current walk-in sites</p> <p> 3 group sites, located in proximity to current group sites</p> <p>RV sites—40 sites with electric hook-ups, located in the T Loop (same as present location)</p> <p>Houseboats—8 boats/32 beds</p> <p>Two backcountry chickees in Florida Bay, located in proximity to Johnson and Rankin Keys</p> |
| Restrooms and Baths (Same as Alternative C) | <p>Public restrooms at marina, fish cleaning station, West Lake day use area, camping areas, and visitor center</p> <p>Hot (pay) shower at marina</p> <p>Restrooms and hot showers in each lodge and cottage unit</p> <p>Common restrooms and solar-heated showers facilities at tent, RV and ecotent areas</p> <p>Restroom and shower on each houseboat</p> <p>Portable restroom at each chickee</p> |

| Element | Alternative D – Preferred Alternative |
|--|--|
| Sustainable Design | |
| Sustainable Design (Same as Alternative C) | Would incorporate sustainable design principles and elements in all new construction and adaptively reused facilities; provide greater consolidation of the development footprint in the Flamingo developed area to increase energy conservation and emission reduction; include increased use of porous pavement and surfaces for parking and other uses; use recycled material for construction of boardwalks and other site features; increased use of native landscaping to enhance native habitats while reducing lawn areas; and use of solar power/alternative energy sources and energy conservation features that demonstrates and teaches environmental stewardship. |
| Restoration | |
| Restored areas (Same as Alternative B) | <p>Approximately 50 acres of lands previously disturbed but no longer needed for facilities would be restored to their previous natural conditions</p> <ul style="list-style-type: none"> ▪ 28 acres—B and C Loops ▪ 22 acres – west side of former lodge area and former cottage area |
| Food Service | |
| Restaurant (Same as Alternative C) | Restaurant in lodge large enough to provide a combination of sit down service with other types of food service to accommodate variable demand throughout the year. |
| Lounge (evening/overnight use) (Same as Alternative C) | Lounge within restaurant would be provided to include light fare, refreshments, and gathering area. There would also be a mini-lounge in the marina area. |
| Marina Area (Same as Alternative C) | Marina store would continue to provide limited snacks, sandwiches, beverages, and grocery items. There would also be a snack bar and mini-lounge in the marina area offering light fare and beverages, while providing a social gathering area. |

| Element | Alternative D – Preferred Alternative |
|--|---|
| Other Facilities and Amenities | |
| Gathering Areas/Associated Recreation Areas (Includes elements from Alternatives A, B and C) | Open area underneath visitor center Amphitheater (replacement facility funded at current location) Screened gathering areas near: visitor center, lodge, ecotents, campground Covered picnic areas (variable screens); i.e. several pavilion areas throughout Flamingo area Board and game room (tie-in with gathering area at lodge) Meeting space(s) in lodge Screened “eco-friendly” swimming pool |
| Environmental/ Eco-friendly Recreation Services (Includes elements from Alternatives B and C) | Eco Pond – Provide programs and tours at Eco Pond; site mirrors the wet/dry seasons and relies on rainfall for maintaining water in the pond rather than artificial manipulation as part of wastewater treatment facility; maintain basic services: safe, maintained trail around the pond free of exotic vegetation. Provide interpretive signs explaining historic and current function of the site, and its eventual reversion to natural conditions. Provide night sky viewing opportunities at the amphitheater and other locations away from lighted areas. Encourage visitors to enjoy natural areas and participate in tours and programs along Florida Bay and in nearby areas including Snake Bight and Christian Point. Other facilities and services: Enhanced trails—canoe and walking/bicycling Designated wildlife viewing areas Bicycle rentals |
| Marina Services (Includes elements from Alternatives B and C) | Marina store offers more products and services than presently available; marina operation complies with State of Florida’s “Clean Marina” program or equivalent environmental standards. |
| Postal Services (Same as Alternative C) | Additional postal services would be provided (i.e., seasonal postal contact station) with USPS cooperation. |

| Element | Alternative D – Preferred Alternative |
|--|---|
| Fuel Service (Same as Alternatives A, B and C) | Boat and vehicle service provided at existing facility next to marina store. |
| Access | |
| Parking (Same as Alternative B) | <p>Free parking at:</p> <ul style="list-style-type: none"> ▪ Visitor center ▪ Marina store ▪ Lot for Florida Bay access ▪ Lot for Whitewater Bay access ▪ Eco Pond ▪ Campground <p>Parking would be reconfigured to accommodate predicted demand and to accommodate day-use and overnight guests.</p> |
| Internal Visitor Circulation (Same as Alternative C) | Seasonal circulator shuttle throughout Flamingo area and “Yellow Bike” system provide alternative transit options for visitors. |
| Snake Bight Tram (Same as Alternatives B and C) | Tram operated by concessioner for guided tours between the Visitor Center and Snake Bight Trail. |
| Shuttle and/or bicycle trail between main park entrance and Flamingo (Same as Alternatives B and C) | To be addressed in General Management Plan (GMP). The GMP may propose shuttle and dedicated bicycle/pedestrian path between main park entrance and Flamingo. |

| Element | Alternative D – Preferred Alternative |
|--|---|
| Visitor Activities | |
| Visitor Center (further guidance in the GMP) (Same as Alternatives B and C) | Visitor Center activities and information services, including those provided by the concessioner, would be relocated to the site of the former Flamingo restaurant. |
| Amphitheater (Same as Alternatives B and C) | Amphitheater would be rebuilt in same general location as previously located, but location may eventually be adjusted based on more detailed site analysis for implementing the CSP. |
| Wilderness permitting (Same as Alternative A) | Continue issuing wilderness permits from Visitor Center. |
| Trails (Same as Alternative C) | <p>Provide new walking/bicycle paths within the Flamingo developed and visitor use areas using pervious or semi-pervious materials to enhance connections throughout the area, including those to wildlife, recreational access and night sky viewing areas.</p> <p>Maintain bicycle restrictions in accordance with existing wilderness regulations.</p> <p>Upgrade trails to increase accessibility (meet Americans with Disabilities Act requirements) and safety.</p> <p>Promote enhanced non-motorized water trails for canoes/kayaks seeking day and overnight experiences.</p> |
| Guide and Livery Services (Same as Alternative C) | <p>Outfitting/camping/backcountry supplies available.</p> <p>Wide range of outfitting, livery and guide services for backcountry access: including education programs, outdoor recreation activities, backcountry transportation, environmental awareness (e.g., Leave No Trace, Outward Bound, etc.).</p> <p>Livery services to Florida Bay, Coot Bay Pond, Hells Bay, Noble Hammock, Nine-mile Pond, and West Lake.</p> |

| Element | Alternative D – Preferred Alternative |
|---|--|
| Boating (Same as Alternative B) | <p>Existing obsolete boat lift would not be replaced; new boat transfer service between Whitewater and Florida Bays would be provided</p> <p>Canoe and skiffs rentals available</p> <p>Dock rental space available on both Florida and Whitewater Bay sides</p> <p>Boat fueling available</p> <p>Boat ramps maintained for Florida and Whitewater Bay access</p> <p>Canoe/kayak launches provided for Florida and Whitewater Bays and backcountry areas</p> <p>Houseboat rentals available</p> |
| Fishing (Same as Alternative C) | <p>Bait and tackle supplies available at marina store</p> <p>Fishing licenses available</p> <p>Enlarged do-it-yourself fish cleaning screened facility that is tied into the wastewater treatment facility is provided</p> <p>Fish cleaning services available from concessioner</p> |
| Tours (Same as Alternative C) | <p>Existing boat tours could be supplemented by additional boat tours to the backcountry and Florida Bay</p> <p>Day and multi-day guided trips offered (hiking, canoeing to Cape Sable and backcountry, etc.)</p> <p>Interpretive and educational hikes provided for various interpretive themes (history/cultural resources, night sky viewing, wildlife and vegetation viewing, photography, etc.)</p> <p>Additional land- (hike/bike) and water-based (canoe/kayak) tours could be offered by other commercial operators (CUAs)</p> |
| Science and Research Support | |
| Science and Research Support (Same as Alternative C) | <p>Overnight accommodations could be used by science and research personnel</p> <p>Provide support facilities for short- and long-term science and research efforts such as computerized work stations</p> <p>Through the GMP, the park would address other potential needs such as climate controlled equipment storage facilities and facilities for sample preparation, specimen collection/preservation and data analysis</p> |

Table F-4: Extent to Which the Preferred Alternative Meets the Project Objectives

For each objective, there is a discussion of how the Preferred Alternative (Alternative D) meets that objective and the identification of where the Preferred Alternative was derived from – Alternative A, B and/or C as they are described in the Draft Plan.

| Objective | Alternative D Preferred Alternative |
|--|---|
| Planning Guidance Objectives | |
| Ensure that any future commercial services facilities at Flamingo give strong consideration to the unique location and environmental conditions that affect development. This includes emphasis on NPS policies regarding sustainable design principles, “green” environmental practices, and safety and accessibility requirements; building code requirements for high-hazard flood zones; and recognition of intense seasonal weather conditions. | Fully meets the objective. The focus of this alternative is sustainable and green design and operation, as well as building to meet high hazard zone building codes. Internal shuttle and bike system would add to meeting this objective. (Alternative C) |
| Provide concessioner(s) with a reasonable opportunity to earn a profit at Flamingo. | Fully meets objective. This alternative is financially viable, and there is enhanced opportunity to capture a greater visitor audience. (Alternative C) |
| Work with a broad range of stakeholders in order to increase the likelihood of successfully implementing the Flamingo CSP. | Fully meets the objective. For all alternatives, a wide range of stakeholders were consulted to develop the range of services offered. (Alternatives A, B and C) |
| Visitor Use and Experience Objectives | |
| Allow for a wide range of appropriate visitor uses that may restore and expand the types of services, visitor capacity, and/or season of services available to the public in the Flamingo area. | Fully meets the objective. The additional visitor services and accommodations provide for a wide range of visitor uses. (Alternative C) |

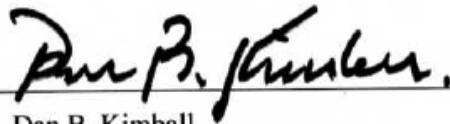
| Objective | Alternative D Preferred Alternative |
|---|--|
| Ensure that the Flamingo CSP identifies the types and levels of visitor activities and services, consistent with protecting park resources and providing quality visitor experiences. | Fully meets the objective. All alternatives have a basis in the types and levels of visitor services that can be provided consistent with protection of park resources. (Alternatives A, B and C) |
| Enhance visitor understanding, enjoyment, and appreciation of park resources through commercial services provided at the Flamingo area. | Fully meets the objective. The additional accommodations and services planned would allow for more interpretive and educational services to reach a wider range of visitors. (Alternative C) |
| Park Resources Objectives | |
| Develop a CSP for Flamingo that minimizes impacts to the natural and cultural resources of the park. | Fully meets the objective. The plan under any of the alternatives would minimize impacts to park resources. This alternative adds some opportunities to decrease impacts related to energy consumption and water use. (Alternatives B and C) |
| Park Operations Objectives | |
| Develop a CSP for Flamingo that maximizes operational efficiencies for both the NPS and the concessioner(s). | Meets objective to a large degree. Provides efficiencies in relation to the overnight accommodation locations and operations, moderate degree of site consolidation and alternative transportation options that support efficient circulation, with most efficient use of staff to serve a large number of visitors. (Alternatives B and C) |

CONCLUSION

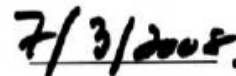
The preferred alternative does not constitute an action that normally requires the preparation of an Environmental Impact Statement (EIS), and the preferred alternative will not have a significant effect on the human environment. Adverse environmental impacts that could occur range from negligible to moderate. There are no unmitigated, adverse impacts on public health or safety, threatened or endangered species, sites or districts listed in or eligible for listing in the NRHP, or other unique characteristics of the region. In addition, no highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence have been identified and implementing the preferred alternative will not violate any Federal, State, or local environmental protection law. There will be no impairment of Park resources or values resulting from implementation of the preferred alternative.

Based on the foregoing, the NPS has determined the preferred alternative will not have a significant effect on the human environment, that an EIS is not required for this project, and that an EIS will not be prepared.

Recommended:



Dan B. Kimball
Superintendent, Everglades National Park

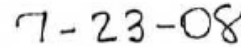


Date

Approved:



David Vela
NPS Regional Director, Southeast Region



Date

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Appendix A

ERRATA

Flamingo Commercial Services Plan Environmental Assessment

The following lists the changes to the draft Flamingo Commercial Services Plan (CSP) / (Environmental Assessment) EA made in response to public comments. The majority changes are the addition of the new preferred Alternative D, as indicated below. The combination of the EA, these Errata sheets, and the attached Floodplain Statement of Findings and Financial Analysis for the preferred alternative form the complete and final record on which the Finding of No Significant Impact is based.

CHANGES IN THE ENVIRONMENTAL ASSESSMENT

1. SUMMARY:

Add summary for Alternative D as follows:

Alternative D – Preferred Alternative. This alternative consists of a combination of elements from Alternatives B and C and takes into consideration the public input and the original purpose, need, and objectives of the Commercial Services Plan (CSP). Like Alternative C, the preferred alternative would provide a mix of commercial services to accommodate a wide range of visitor preferences and needs, with an emphasis on eco-friendly concepts and sustainable design features. A new lodge and cottages would be located close to the marina and visitor center area, while the recreation vehicle (RV) (with electric hook-ups) would remain at the T-loop. Eco Pond would remain a visitor use area while the area it occupies would continue to restore itself in the coming years, and an environmentally-friendly swimming pool would be provided as part of the new lodge. A Flamingo circulator shuttle would transport visitors to key destinations within the Flamingo area and a “Yellow Bike” system would provide overnight guests with enhanced access to the marina, restaurant, lodging and other visitor services, while reducing the frequency of private vehicle use.

Page “Summary 2” – first full paragraph, replace first 6 sentences with the following:

The park selected a preferred alternative following receipt of public comment on the EA. Alternative D was developed by selecting the best combination of elements from Alternatives B and C to meet the majority of public concerns. All alternatives are financially viable, and Alternative D has long-term revenue potential needed to attract and maintain a commercial services provider. None of the alternatives have any major adverse or major beneficial impacts to the resources or values evaluated, and Alternative D has also been identified as an environmentally preferred alternative.

2. PURPOSE AND NEED: Chapter 1 – replace Figure 1-10 with figure on following page (Page 1-23 of the draft CSP/EA) and add new location information, below.

The Johnson Key chickee location falls within the general area described in the Draft CSP/EA while the Shark Point chickee (previously identified as the Rankin Key chickee) is about ¼ mile beyond the general location area identified in the draft CSP/EA. Based on funding that became available in May 2008 to implement this portion of the CSP, a site selection team visited the areas on June 3, 2008, to finalize locations. The team determined that the Shark Point chickee location (¼ mile northwest of the general area identified in the draft CSP/EA) better met the siting criteria identified on page Page 2 to 7 of the draft CSP/EA. In particular, the new location is better suited for protecting important nesting areas and rookeries, provides a location that is further away from nearby boating travel corridors, offers better views of the bay, and provides deeper water so that National Park Service (NPS)

maintenance barges have easier access. Since this chickee is replacing the Shark Point ground site about ½ mile to the north and this new location is more distant from Rankin Key, the planning team views the name “Shark Point Chickee” as more appropriate than “Rankin Key Chickee” as it was called in the draft CSP/EA.

Regarding construction of the chickees, their size and capacity would remain as described in the draft CSP/EA, Page 2-7), but there may be options in terms of structure design and construction materials that are more sustainable and will be fully analyzed as part of project implementation. All of the impacts associated with the chickees being developed as described above would be equal to or less than the impacts described in the draft CSP/EA.



Figure F-1 Expanded Study Area
(Figure provided by Everglades National Park)

3. **ALTERNATIVES: Chapter 2 – replace text under “Replacement Maintenance Facilities with the following text (Page 2-7 of the draft EA)**

Replacement Maintenance Facilities

The 2005 storms severely damaged the existing maintenance office/shop and the boat repair shop, located in the maintenance area just north and west of the employee housing area. Under all alternatives, these damaged structures would be removed and replaced at the site of the former concessioner storage building also located within the maintenance area, about 200 feet south of the damaged maintenance office/shop building. The new facility would be established by adaptively reusing the former concessioner storage building (built in the 1960s) as the marine and carpenter shops. Adjacent to this building a new elevated office building would be built. The two buildings would be connected by an elevated breezeway. Immediately west of the office building would be a new emergency vehicle storage facility.

All of the uses and facilities were originally described in the draft CSP/EA as being located at the site of the old maintenance office/shop building. The current proposal will meet the same requirements at a reduced cost. All of the impacts associated with this facility being developed in this new location and manner would be equal to or less than the impacts described in the draft CSP/EA. New structures will be elevated an additional four feet from current elevation.

4. ALTERNATIVES: Chapter 2 – add information for preferred Alternative D as follows (following Page 2-25 of the draft EA):

PREFERRED ALTERNATIVE (ALTERNATIVE D)

The preferred alternative, Alternative D, consists of a combination of elements from Alternatives B and C of the draft Plan/EA, and takes into consideration both public input and the original purpose, need, and objectives of the CSP. Like Alternative C, the preferred alternative would provide a mix of commercial services to accommodate a wide range of visitor preferences and needs, with an emphasis on eco-friendly concepts and sustainable design features. The mix of accommodations would reflect the market for a more eco-friendly destination (a single, elevated lodge; elevated cottages; houseboats; ecotents; RV campground with electric hookups; backcountry chickees in Florida Bay), and the numbers and sizes of these facilities would reflect what is likely necessary for profitability by a future concessioner. Like Alternative B, the RV campsite would remain at T Loop but would be upgraded with electrical hookups, Eco Pond would remain a visitor use area while the area it occupies would continue to restore itself in the coming years, and an environmentally-friendly swimming pool would be provided as part of the new lodge.

The site design and the redevelopment of the Flamingo area would allow the area to function more efficiently for visitors, the concessioner and the park than it did in the past. The new design would facilitate pedestrian and bicycle access and circulation throughout the Flamingo area. The lodge and cottages would be located in proximity to the marina and visitor center, while the RV campsite would remain at T Loop. A Flamingo circulator shuttle would transport visitors to key destinations within the Flamingo area and a “Yellow Bike” system would provide overnight guests with enhanced access to the marina, restaurant, lodging and other visitor services, while reducing the frequency of private vehicle use.

As a result of this reconfiguration, approximately 50 acres within the Flamingo developed area would be restored to their previous natural conditions, including 28 acres at the former B and C Loops and 22 acres in the old lodge and cottage areas. Figure F-2 depicts the site development and services proposed under the preferred alternative.

Because funding may not be immediately available to support the construction of all the proposed facilities at the same time, the plan may be implemented and constructed in phases. Most likely, the sequence for implementation would be in the following four phases:

1. Houseboats; additional food service in the marina area; backcountry chickees; electric hook-ups for the RV sites; solar hot showers at the camping area restrooms; Flamingo circulator shuttle; additional canoes, kayaks and bicycles
2. Cottages, gift shop, Snake Bight Tram
3. Ecotent facilities
4. Lodge (with restaurant, lounge and swimming pool)

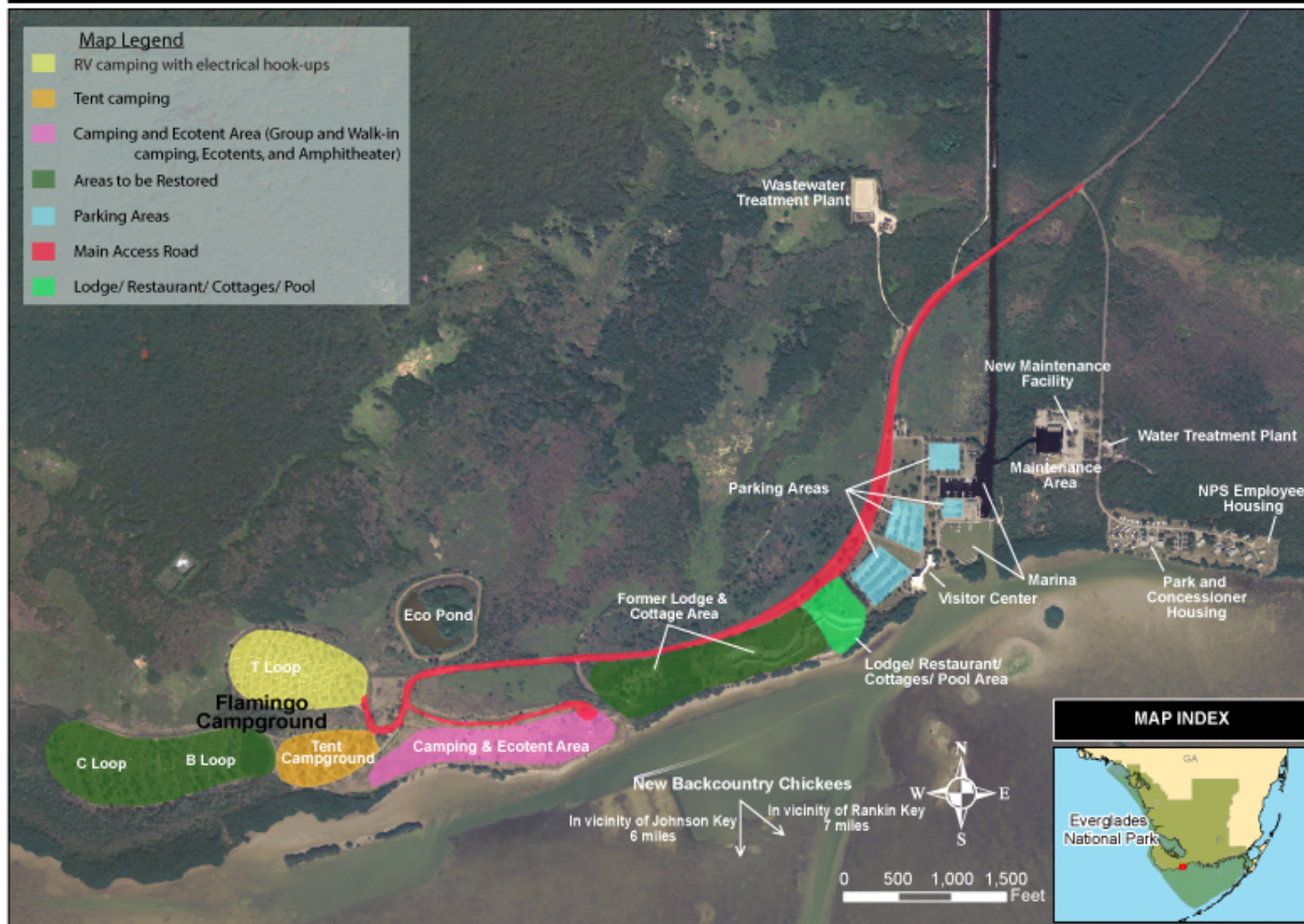


Figure F-2 Preferred Alternative

(Photo courtesy of USGS, 2004 (Pre-Hurricane) – provided by Everglades National Park in January 2007)

ACCOMMODATIONS

The preferred alternative would offer a variety of accommodations, similar to those in Alternative C. The only difference occurs in the location of the RV campground, which would remain in the T Loop as described in Alternative B.



Figure F-3. Alternative D, Example Lodge Design*

(Courtesy Royal Concrete Concepts)

*(*no first floor living space at Flamingo; final design to be determined when site design is complete)*

- Lodge – 1 permanent structure: 30 units (estimated 50-year life);
- Cottages – 24 permanent units (estimated 50-year life);
- RV Sites – 40 RV sites in the T Loop with electric hookups (potentially with solar-based power)
- Tent Camping – 130 sites, including 55 drive-in at A Loop, 72 walk-in and 3 group sites located with the proposed ecotents along the Florida Bay shoreline.
- Ecotents – 40 semi-permanent structures with solar-based power
- Houseboats – 8 boats (32 beds)
- Florida Bay backcountry chickees – 2 double chickees (each double chickee would accommodate up to 2 groups and a maximum of 12 campers)

Conceptual sketches of how these proposed facilities may appear are found in Figures F-3 through F-5. Principles of sustainability would be incorporated into the designs of each based on Best Management Practices (BMPs) available at the time of construction.

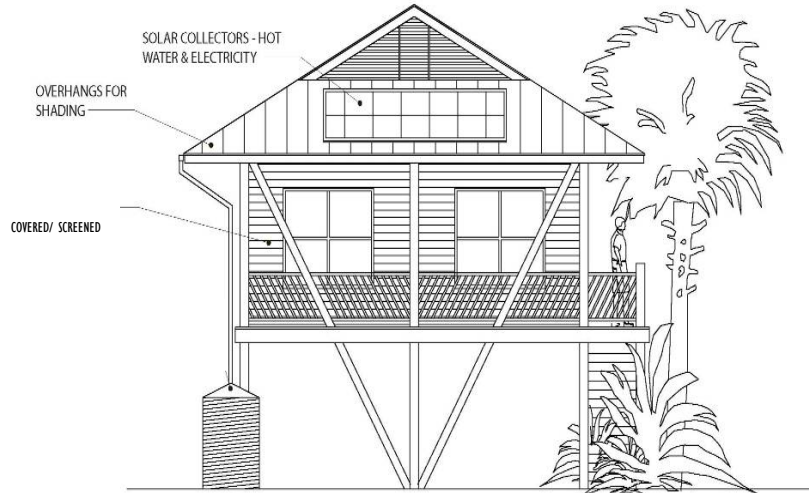


Figure F-4. Alternative D, Conceptual Cottage Design
(final design to be determined when site design is complete)

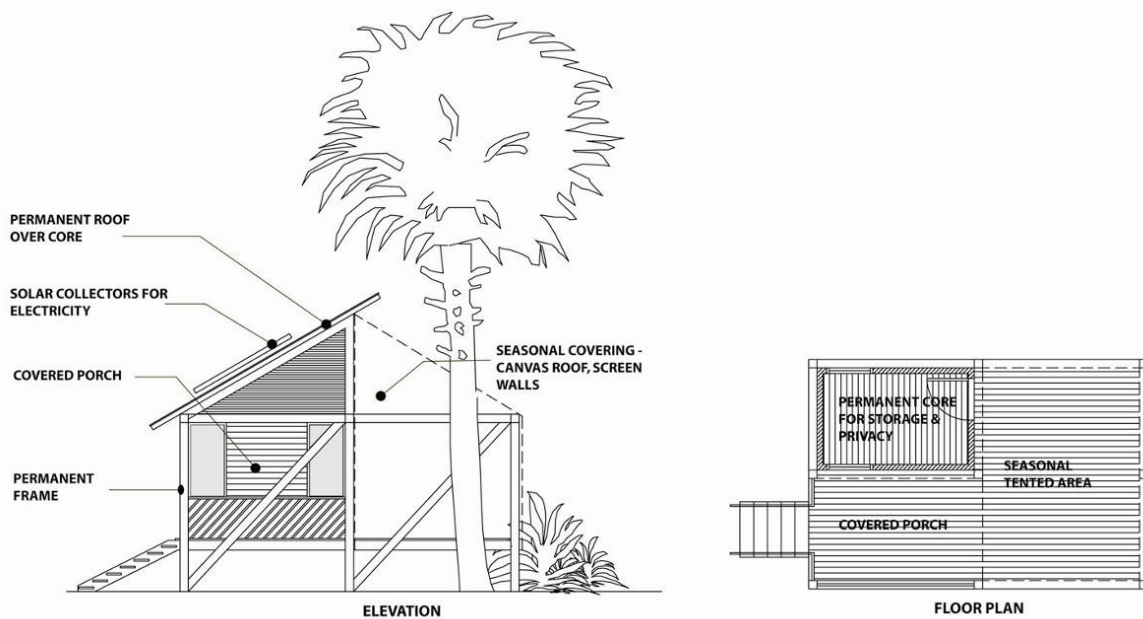


Figure F-5. Alternative D, Conceptual Ecotent Design
(final design to be determined when site design is complete)

FOOD SERVICE

Food service would be the same as proposed in Alternative C: a combination of an informal sit-down service and other types of food service would be provided. The food services offered could be modified to accommodate variable demand throughout the year. There would be a full restaurant and lounge provided

at the lodge. A snack bar/open air lounge would be provided in the marina area to supply food service and a social gathering area for visitors.

OTHER FACILITIES AND AMENITIES

Screened gathering areas would be located near the visitor center and lodge, and covered picnic areas (pavilion areas) would be located in several strategic locations in the Flamingo area.

Eco Pond would remain a visitor use area, allowing for self- and guided-tours and programs. Since Eco Pond is no longer connected to the Flamingo wastewater treatment system, the presence of water in Eco Pond would be rainfall-driven; there would no longer be any manual manipulation occurring at the site. The trail around the pond would be maintained and exotic species actively removed. Interpretive signage would be provided explaining the past, present and future stories of Eco Pond.

The wilderness permitting process for backcountry trips would continue to operate from the visitor center.

An eco-friendly swimming pool (built and maintained with energy efficient and filtration technologies, and minimal chemical use) would be located adjacent to the lodge and cottages.

Postal service (stamps, postcards) would be provided with U.S. Postal Service cooperation.

Support for science and research efforts in the park that could utilize Flamingo as a temporary base of operation would be met through personnel using available overnight accommodations and by establishing computerized work stations for Everglades National Park staff, university and agency cooperators.

ACCESS

Access into and around Flamingo would be reconfigured to conform with the new site design. The exact number of parking spaces needed and the layout and design for parking would be determined during the site planning and design process.

All new parking areas would use pervious or semi-pervious materials with incorporation of stormwater BMPs applicable to the Flamingo area.

A seasonal circulator shuttle within Flamingo would be provided by the concessioner providing convenient connections for visitors and employees between the major Flamingo facilities and destinations. Bicycling would be encouraged by the provision of a “Yellow Bike” service that would offer coaster-type bikes to overnight guests at no charge. These bikes would be used for transit throughout the Flamingo area.

VISITOR ACTIVITIES

Visitor Center

Visitor Center activities and information services, including those provided by the concessioner, would be relocated to the site of the former Flamingo restaurant.

Trails/Backcountry Access

New walking/bicycle paths would be provided within Flamingo to provide connectivity between the various visitor use areas, using pervious or semi-pervious materials. Bicycle restrictions would be maintained in accordance with existing wilderness regulations for the surrounding area, but bicycle paths/facilities within the Flamingo developed area would be increased and upgraded to facilitate safe and convenient transportation and recreation. Additionally, walking paths/trails to access the new facilities, and destinations such as wildlife and/or night sky viewing areas would be provided. Boardwalks would be installed where needed to reduce impacts to the ground surface. Non-motorized water trails for canoes and kayaks would continue to be maintained and enhanced information on backcountry opportunities including access to the new backcountry chickees would be provided.

Guides and Livery Services

A variety of camping and backcountry supplies would be available at the marina store.

A wide range of outfitting and livery services for backcountry access and transportation would be provided. Livery services to trailheads in proximity to Flamingo (e.g., Coot Bay Pond, and West Lake, etc.) and backcountry destinations would be available.

Private fishing guide and charter services would continue to operate from Flamingo through the concessioner and under commercial use authorizations (CUAs).

Tours

A range of boat tours offering interpretative services would continue to be provided and would be expected to be enhanced, as one or more tour boats could be added to the fleet for Florida Bay and backcountry tours. Guided land- and water- based tours and canoe and kayak tours would continue and be expanded.

Reinstituted tram tours on Snake Bight Trail would operate seasonally.

Boating

Canoe, kayak, and skiff rentals would continue, with dock rental space available. The existing boat ramps would be maintained. Additionally, a new boat transfer service between Whitewater Bay and Florida Bay would be provided, and there would be better publicized information regarding canoe/kayak launch and staging areas.

Fishing

Bait and tackle supplies, and fishing licenses would continue to be sold at the marina store. The screened fish cleaning station would be enlarged and the disposal process would function in a more environmentally sound manner by connecting it to the Flamingo wastewater system. The concessioner would offer fish cleaning services.

Restored Areas

Approximately 50 acres of lands previously disturbed but no longer needed for facilities would be restored to natural conditions. This would include 28 acres in the B and C Loops of the campground, and 22 acres that include the west side of former lodge area and the entire former cottages area.

SUSTAINABLE DESIGN

New construction would incorporate the following BMPs:

- Porous paving to reduce the runoff generated by any parking areas; porous paving allows stormwater to infiltrate the ground instead of running off into the surrounding waters. By minimizing runoff, the potential for erosion and/or the transport of surface pollutants into adjacent waters would be greatly decreased.
- The final design layout for Flamingo would include landscaping that reduces the amount of manicured lawns and promotes the growth of native vegetation. This would reduce the time and energy consumption required to maintain Flamingo. Using native vegetation would provide beneficial impacts to wildlife and provide additional interpretive opportunities by educating the public on the value of native landscaping and site restoration efforts.
- Ecotents would provide a type of lodging that exemplifies sustainability, providing a low-cost, low-impact lodging option available on a seasonal basis.

ENERGY

Because of Flamingo's sub-tropical climate, NPS would incorporate "Design with Climate" principles into building design to off-set overall energy consumption. Such design principles include: using overhangs to shade walls and openings; using site features and vegetation to provide shading to walls with eastern and western exposure; using shading devices such as louvers, covered porches, and trellises with natural vines to block sun without blocking out breezes and natural light; orienting broad building surfaces away from the hot late-day western sun; using lighter-colored wall and roofing materials to reflect solar radiation; using shutters and screens, avoiding glass and exposures to direct solar gain; providing shading on east, south and west facades; providing covered walkways and balconies; maximizing insulation, particularly in the roof; including cross ventilation, if possible, in rooms; using high performance glass that maximizes view and light but minimizes heat gain; using automatic set back thermostats tied to room occupancy; using compact florescent lighting; using on-demand hot water heaters.

- Solar power would be used wherever possible.
- Current energy BMPs available at the time of construction would also be used wherever possible.

WATER CONSUMPTION

- Overall water consumption would be reduced with the use of water saving devices (e.g., bathroom fixtures) and sustainable design principles.
- Current water consumption BMPs available at the time of construction would be used wherever possible.

MATERIALS

- Using locally produced and "hurricane resistant" materials (such as hurricane-resistant pre-cast concrete or equally strong materials) wherever possible, would minimize transportation costs, energy use requirements, and potential structure repair or replacement efforts.

CONSTRUCTION

All construction within Flamingo would be in compliance with the Florida Building Code, particularly the section on High Velocity Hurricane Zone provisions. Flamingo is located in the highest wind speed and exposure zones for hurricanes and storms. BMPs that may be used to protect Flamingo's facilities include elevating buildings for flood protection and design features that reduce/minimize impacts from wind and storm activities.

In addition, the semi-permanent ecotents proposed under this alternative would be constructed using the BMPs available at the time of construction.

GENERAL OPERATIONS

The NPS would institute environmentally friendly and sustainable maintenance programs aimed at: reducing the total amount of waste generated on site; expanding Flamingo's recycling programs; increasing the use of biodegradable, non-toxic cleaning products; choosing merchandise based on the amount of recycled content, biodegradability, and minimum packaging; and using native vegetation for landscaping.

Lodge, cottages, and parking areas would incorporate:

- Recycled plastic lumber in lieu of wood for the construction of any required boardwalks. Recycled plastic lumber is clean, nontoxic, and nonporous, and lasts longer than wood. It is

virtually maintenance free, has lower long-term maintenance costs, diverts plastic waste from landfills, and reduces overall wood use.

5. ALTERNATIVES: Mitigation (Page 2-25 of draft EA):

Replace with mitigation as listed in Appendix D of this FONSI.

6. ALTERNATIVES: Financial Analysis (Page 2-30 of draft EA) – add the following for the preferred Alternative D:

FINANCIAL ANALYSIS OF THE PREFERRED ALTERNATIVE

A financial analysis of the preferred alternative was conducted to estimate the financial feasibility of implementing the CSP. The accompanying document titled “Flamingo CSP – Preferred Alternative Financial Analysis” provides a detailed financial analysis for implementing the preferred alternative, including assumptions used to develop the financial model, financial performance and profitability estimates, and details on project phasing.

The preferred alternative described in the financial analysis considers the environmental issues of the Park and Flamingo area resources, known desired and anticipated visitor experiences sought, and likely profit requirements of a potential concessioner. It is estimated that a concessioner would be able to achieve a \$3.4 million Earnings before Interest, Taxes, Depreciation and Amortization annually given visitation and operating parameters. At the estimated level of investment and future cash flows, the preferred alternative would yield an average annual return on investment of 17.6 percent, projected on a 20-year contract. A required return on investment for a project of this type is estimated to be between 15 and 20 percent annually. To achieve a return of 15 percent, no additional funding would be required. To achieve a higher return on investment of 18 percent to 20 percent, somewhere between \$456,000 and \$2.7 million in alternative funding beyond what a concessioner might be expected to contribute would be required.

“Class C” capital cost estimates were prepared for the preferred alternative and can be found in Table F-1: Preferred Alternative Class C Cost Estimates in 2008 dollars (Page 25). Class C estimates are cost estimates that occur at the conceptual level of planning. All estimates for construction include government factors to account for the remote location, Federal wage rate factor, design contingency, government general conditions, prime fees, contracting method adjustment, and escalation. All of these estimates were based on single-unit costs, and costs were not adjusted to account for possible volume discounts or similar cost savings; therefore, these figures are conservative, and are represented in 2008 dollars. As CSP implementation moves forward, Class B (Budgetary Estimates) would be developed at the schematic design phase and Class A (actual estimates) would be developed for the associated construction documents.

The Class C cost estimates were used to inform the financial feasibility of implementing the preferred alternative. This included an analysis of phasing options, potential return on investment rates, and the possible need to seek funding from additional sources in order to make implementation more feasible. Overall, the preferred alternative presents the most financially advantageous alternative for concession operations since it has the potential for capturing a larger visitor audience and also includes operating efficiencies created by the use of alternative energy sources and adaptations to the seasonality of the expected visitation to the Park and the Flamingo area. In any case, implementing the preferred alternative may need to occur in phases if financing for all proposed services and facilities is not available at one time.

Table F-3 – Preferred Alternative Class C Cost Estimates (in 2008 dollars)

| Item | Alternative D – Preferred Alternative | |
|---|---------------------------------------|--|
| | Quantity | Cost |
| Canoes | 20 | \$24,000 |
| Kayaks | 60 | \$39,000 |
| Bicycles | 50 | \$10,000 |
| Skiffs | 5 | \$70,000 |
| Lodge w/ restaurant and lounge | 30 units (14,250 gross sq. feet) | \$6,260,000 (additional costs compared to Alternative C to meet new accessibility requirements) |
| Cottages (1 BR units) | 24 units (500 sq. feet/unit) | \$2,923,000 (additional costs compared to Alternative C to meet new accessibility requirements) |
| Ecotents | 40 (260 sq. feet/unit) | \$1,789,000 |
| Bath house (for ecotents) | 1 | \$600,000 |
| Houseboats | 8 (4 beds/boat) | \$2,000,000 |
| Snack bar/mini lounge (Marina) | 1 | \$330,000 |
| Swimming pool | 1 | 200,000 |
| Elec hook-ups for RV sites | 40 | \$160,000 |
| Gift shop | 1 | \$685,000 |
| Concessioner housing | | \$4,425,000 to \$7,075,000 |
| Tour boats | 2 | \$350,000 |
| Restrooms w/ hot showers(Camping areas) | 5 | \$250,000 |
| Internal circulator shuttle | 1 | \$50,000 |
| Snake Bight tram | 1 | \$70,000 |
| TOTAL | | \$20,235,000 to \$22,885,000 |

**Costs for lodging are in “ready to use” condition and include all furnishings.*

7. ALTERNATIVES: How Alternatives Meet Objectives (Page 2-31 of draft EA):

Add the following text for the preferred alternative:

As stated in the “Purpose and Need” chapter of the draft Plan, the preferred alternative must meet all objectives to a large degree to be considered reasonable. The preferred alternative must also address the stated purpose of the plan and resolve the need for action. The preferred alternative addresses the purpose of the plan, resolves the need for action, and as presented in Table 4: Extent to Which the Preferred Alternative Meets the Project Objectives (page 26), the preferred alternative fully meets or meets to a large degree each of the project objectives.

8. ALTERNATIVES: The Environmentally Preferred Alternative (Page 2-31 of draft EA):

Replace with the text included in this FONSI (pages 6-8)

9. ALTERNATIVES: tables, 2-5, 2-6, 2-7:

Add the following information for Alternative D (preferred alternative):

For table 2-5 (Alternatives Summary Matrix) - add information from table F-2, below

For table 2-6 (Comparison of the Extent to which Each Alternative Meets the Project Objectives) - add information from table F-3, below

For table 2-7 (Summary of Environmental Consequences) – add information from table F-4, below

Table F-2: Summary of Environmental Consequences for the Preferred Alternative

For each impact topic below the cumulative impacts for the preferred alternative, Alternative D, are described. This information is provided in the errata because it was omitted from the impact analysis for the preferred alternative released to the public in April 2008. All other impact analysis information previously presented on the preferred alternative, including statements regarding impairment to resources, is incorporated in the EA for this project. The cumulative effects described below would not result in significant impacts to these resources and would not result in impairment.

| Impact Topic | Alternative D - Preferred Alternative |
|----------------------------------|--|
| Geologic Resources/ Soils | <p>Cumulative Impacts. Other actions within the Flamingo area have impacted or would continue to impact soils. A small fire that occurred in the Flamingo campground and other prescribed burns have had very localized, short-term minor adverse impacts on soils. Construction of the new water system and wastewater treatment plant impacted soils in a very limited area and to a negligible extent. The proposed removal of underground storage tanks near the marina and resurfacing the roads and parking facilities would involve ground disturbing activities that would have short-term minor adverse impacts to soils within the area. These impacts, in combination with the long- and short-term minor adverse and long-term minor beneficial impacts to soils and long-term negligible adverse impacts to geology or topography resulting from the no action alternative, would result in long-term minor adverse cumulative impacts to soils and long-term negligible adverse impacts to geology and topography.</p> <p>Cumulative impacts would affect soils, and in combination with the long- and short-term minor adverse and long-term minor beneficial impacts to soils and long-term negligible adverse impacts to geology or topography, would result in long-term minor adverse cumulative impacts to soils and long-term negligible adverse impacts to geology and topography.</p> <p>The cumulative impacts from Alternative D would involve some level of ground disturbance, and combined with the above beneficial and adverse impacts, would result in long-term minor adverse cumulative impacts to soils and long-term negligible adverse impacts to geology and topography.</p> |

| Impact Topic | Alternative D - Preferred Alternative |
|--------------------|--|
| Air Quality | <p>Cumulative Impacts. Cumulative impacts on air quality would result from the planned construction activities related to the removal of a storage tank, park building repairs and construction, and routine maintenance. Routine maintenance includes the resurfacing of park roads; park, commercial, and recreational vehicle use; and trail clearing. Natural and prescribed fires could also add to possible air pollution, although no additional prescribed burns are planned at this point in time. Future increases in visitation over the years would bring more visitors and more vehicles into the Flamingo area. As a result of these activities, cumulative impacts on air quality in the park are expected to be mostly short term, because emissions would not all occur at the same time and would be readily dissipated by prevailing winds, and range from negligible to minor adverse. Air quality would be expected to stay within state and federal standards.</p> <p>Additional operations at Flamingo would result in localized, mostly intermittent or short term, minor, adverse impacts on air quality within the analysis area. Cumulative impacts from the operation of increased services at Flamingo; routine park operations; park, commercial, and recreational vehicle uses; and other emissions sources outside the park are expected to result in short term, negligible to minor, adverse impacts on air quality throughout the park, and air quality would remain within state and federal standards.</p> |
| Soundscapes | <p>Cumulative Impacts. Park maintenance and minor construction actions, such as resurfacing of the roads and parking facilities, trails maintenance, replacement of underground storage tanks, and landscaping would cause short-term minor adverse impacts because of mechanized and heavy equipment noise. Additional visitors would be expected if other RV campgrounds in the region remain closed. Cumulative impacts would include higher visitation levels and associated noise, especially near the more developed areas and gathering spots. Cumulatively, the reasonably foreseeable projects, in combination with Alternative D, would have short-term and long-term minor adverse impacts on soundscapes at Flamingo if best management practices for noise mitigation are followed.</p> |

| Impact Topic | Alternative D - Preferred Alternative |
|----------------------|--|
| Water Quality | <p>Cumulative Impacts. Water quality in and around Flamingo has been affected in the past by development of the facilities, development and discharges from upper watershed areas, and continued use of the Flamingo area by visitors and boaters. Studies of Florida Bay show changes in water quality over the year, including an increase in turbidity in Western Florida Bay. Past, current, and future expected non-point runoff, emissions from fueling and boating, and occasional dredging all contribute minor adverse impacts to water quality. Removal of underground storage tanks at the marina is planned in the near future; this would remove a potential source of contamination near the marina, a beneficial effect. Future planned construction, such as resurfacing of the roads and parking facilities would contribute to short-term, minor adverse impacts during the time of construction due to the potential for runoff of sediments and possibly equipment oils or fuels if spilled or leaked. The addition of the Flamingo Wastewater Treatment Plant has provided a long-term benefit to local water quality. The impacts of the no action alternative, added to the adverse and beneficial effects from other past, present, and reasonably foreseeable actions, would result in long-term, minor adverse cumulative impacts to water quality.</p> <p>Cumulative impacts under alternative D would result in long-term benefits arising from the restoration of 50 acres of the Flamingo area that would help to filter runoff to surface and ground waters. Continued use of the Flamingo area by visitors and boaters would include emissions from fueling and boating, and very infrequent dredging, which would be expected to contribute more non-point pollution. The impacts of alternative D, added to the adverse and beneficial effects from other past, present and reasonably foreseeable actions, would result in long-term, minor adverse cumulative impacts to water quality.</p> |
| Wetlands | <p>Cumulative Impacts. Wetlands in and around the Flamingo developed area have been indirectly affected in the past by facility development and maintenance (runoff from construction sites, etc.) and continued use of the Flamingo area by visitors and boaters. Future planned construction, such as resurfacing of the roads and parking facilities, would not directly affect wetlands, since these actions would all occur within disturbed areas.</p> <p>Cumulative impacts under alternative D would include long-term benefits arising from the restoration of 50 acres of wetlands. Continued use of the Flamingo area and surrounding waters by visitors and boaters may cause negligible to minor adverse effects through off-trail use and boating (propeller damage). However, the impacts of 50 acres of wetlands, added to the adverse and beneficial effects from other past, present and reasonably foreseeable actions since the development of Flamingo, would result in long-term, minor to moderate beneficial cumulative impacts to wetlands.</p> |

| Impact Topic | Alternative D - Preferred Alternative |
|------------------------|--|
| Floodplains | <p>Cumulative Impacts. The 100-year floodplain in and around Flamingo developed area has been affected in the past and would continue to be affected in the future by the continued presence of structures and continued use of the Flamingo area, which is all within the 100-year floodplain. Future planned construction would include hurricane proofing, per the Hurricane Response Plan. Cumulative impacts under alternative D would include long-term benefits arising from the restoration of 50 acres of floodplain. Continued occupancy and use of the Flamingo area by visitors and employees would continue to represent a long term unavoidable adverse impact. However, the impacts of 50 acres of floodplains, added to the adverse effects from other past, present, and reasonably foreseeable actions in the 100-year floodplain since the development of Flamingo, would result in long-term, minor beneficial cumulative impacts to floodplains.</p> |
| Wilderness Area | <p>Cumulative Impacts. Cumulative impacts on the wilderness character or values around Flamingo would be affected by possible increased noise from more construction activities, boat-related impacts to the bay bottom wilderness, and the increased buffer provided by the restoration of previously disturbed areas. The GMP is expected to include provisions for increased boater education and improved navigational tools so that resource protection and access to the park occur with reduced impacts. Most of the activities associated with alternative D are limited to the developed area, with only potential short- and long-term, negligible to minor adverse, as well as long-term, minor indirect beneficial, effects on wilderness. In combination with past, present, and reasonably foreseeable future actions, cumulative impacts to wilderness would be long-term, minor to moderate, and adverse.</p> |

| Impact Topic | Alternative D - Preferred Alternative |
|--------------------------------------|--|
| Wildlife and Wildlife Habitat | <p>Cumulative Impacts. Wildlife, wildlife habitat, and vegetation have all been affected by continued development of the facilities, trails, parking, and roads in the Flamingo area, as well as infrastructure upgrades (wastewater treatment plant, potable water system). In addition, visitor use in the area, which had increased until the recent hurricane events, also had impacts on terrestrial and submerged aquatic vegetation. Maintenance activities such as ongoing exotic plant control, fire management, and landscape management have also contributed to impacts on wildlife, wildlife habitat, and vegetation. Exotic plant control and prescribed burns are used for the restoration of habitat and although there may be short-term, adverse impacts, the long-term effects are beneficial.</p> <p>Other past and present activities that have affected or are affecting wildlife, wildlife habitat, and vegetation include various infrastructure upgrades, the removal of underground storage tanks, resurfacing of roads and parking areas, and maintenance activities at Flamingo. However, the impacts would be temporary, only lasting the duration of the construction or system maintenance activities. Plans for restoring the Everglades ecosystem would have longer-term, beneficial effects, while some of the planned regional transportation projects may indirectly contribute to visitor-use related impacts on wildlife, wildlife habitat and vegetation, if they contribute to increased visitation to Flamingo over time.</p> <p>Cumulative impacts under alternative D would contribute some short- and long-term, negligible to moderate adverse impacts, as well as long-term, minor to moderate, beneficial effects (from reducing the footprint of currently disturbed areas and allowing some areas to be restored to natural conditions). Taking these factors into consideration, the cumulative impacts to wildlife, wildlife habitat, and vegetation are expected to be long-term, minor, and adverse.</p> |

| Impact Topic | Alternative D - Preferred Alternative |
|---|--|
| Threatened and Endangered Species and Species of Special Concern | <p>Cumulative Impacts. Federal and state-listed species, as well as species of special concern have all been affected by the continued development of the facilities, campgrounds, infrastructure, trails, parking, and roads in the Flamingo area. In addition, visitor use in the area, which had increased until the recent hurricane events, has also had impacts. Maintenance activities such as ongoing exotic plant control, fire management, and landscape management have also contributed to impacts (both adverse and beneficial) on federal and state-listed species, as well as species of special concern.</p> <p>Other activities with the potential to affect federal and state-listed species, as well as species of special concern, include the removal of underground storage tanks, resurfacing of roads and parking areas, and infrastructure upgrades (wastewater treatment plant, potable water system) at Flamingo. However, the impacts from these activities would be temporary, only lasting the duration of the construction activity. Plans for restoring the Everglades ecosystem would have longer-term, beneficial effects, while some of the planned regional transportation projects may indirectly contribute to visitor-use related impacts, if they contribute to increased visitation to Flamingo over time.</p> <p>The cumulative impacts under alternative D would contribute some short- and long-term, minor adverse impacts, and there would also be long-term, minor to moderate, beneficial effects from restoration of disturbed areas. Taking these factors into consideration, the cumulative impacts to federal and state-listed species, as well as species of special concern, are expected to be long-term, negligible, and adverse.</p> |
| Cultural Resources | <p>Cumulative Impacts. Because there would no disturbance in previously undisturbed areas associated with ongoing management activities, implementation of alternative D would have long-term minor adverse impacts on cultural resources at Flamingo. However, other actions related to tank removal, road resurfacing, and other site construction would result in negligible to minor adverse impacts on cultural resources. The proposed nomination of the Mission 66 program structures to the National Register of Historic Places would have a long-term minor beneficial to the historic structures and cultural landscape because it would encourage the compatibility of renovations and construction. Any development in the Flamingo area would need to be compatible with the historic structures or any district that is proposed. The proposed Ingraham Highway Historic District boundaries would touch the proposed Flamingo footprint. Overall, with proper mitigation measures, under alternative D there would be long-term, negligible adverse cumulative impacts to cultural resources.</p> |

| Impact Topic | Alternative D - Preferred Alternative |
|-----------------------------------|---|
| Visitor Use and Experience | <p>Cumulative Impacts. Other actions could, in combination with alternative D, result in impacts to visitor use and experience. These include the Florida Circumnavigation Saltwater Paddling Trail, which would bring thousands of paddlers to various areas along the 26 segments that range from the Everglades to Fort Lauderdale. Other plans or projects include: a General Management Plan determining the 20-year vision for the Park; the Comprehensive Interpretive Plan that would address plans for interpretation in the Flamingo area, improving visitor understanding and experience for those who wish to delve into the resources at the park; a Wayside Exhibit Plan that may include wayside exhibits in the Flamingo area, again improving the visitor experience for some; the Hurricane Response Plan that would improve the visitor experience (and safety) and require any new buildings to be hurricane-proof; the Mosquito Control Program, a regional planning effort, would not be directly beneficial to visitors since the NPS does not spray in visitor areas, but would indirectly benefit visitors since spraying will increased employee productivity and promote staff retention; and the Comprehensive Everglades Restoration Plan (including a Manatee Management Plan) that would indirectly affect visitor experience because visitors may be able to enjoy more of the natural resources that would be restored.</p> <p>Under alternative D, long-term moderate beneficial impacts would occur to visitor use at Flamingo, adding more visitor activities and amenities to the area. Combined with the other projects that are adding or improving visitor experiences, the cumulative impacts would be long-term, moderate, and beneficial.</p> |
| Night Sky | <p>Cumulative Impacts. Backcountry camping, boating, and hiking in areas currently with few services would be impacted by actions planned for the Park, including the Florida Circumnavigation Saltwater Paddling Trail, which could bring thousands of paddlers with campfires and lanterns to various areas along the 26 segments that range from the Everglades to Fort Lauderdale. Cumulative impacts under alternative D would include adverse and beneficial impacts based on the contribution of the redevelopment. Cumulatively, the reasonably foreseeable projects, in combination with alternative D would have long-term minor adverse impacts on the night sky at Flamingo, even if prescribed lighting practices (such as down-shielded lights) are followed.</p> |

| Impact Topic | Alternative D - Preferred Alternative |
|-------------------------|--|
| Socioeconomics | <p>Cumulative Impacts. The majority of the projects considered for cumulative impacts analysis for alternative D deal most substantively with park operations or species/habitat management. These projects would be expected to have negligible socioeconomic impacts, individually and cumulatively. Other projects, such as the regional transportation projects, would potentially have either a negligible or minor beneficial impact on the economy of the region of influence (ROI). Local and regional population growth, especially that occurring in local communities close to the park, would result in both adverse and beneficial local socioeconomic effects, depending on the level of growth and the ability of the communities to provide needed services. When considering the effects of implementing Alternative D in the context of other substantial regional effects in and around Flamingo, cumulative impacts would be short- and long-term negligible beneficial impacts in the ROI as a whole, with minor long-term beneficial impacts expected in Monroe County. Increases in visitors would result in increased economic activity by these visitors, and this would also result in increased park resources being provided to support the increased activity. These increases would result in higher revenues for local businesses that cater to park visitors and personnel, and these increased revenues themselves would prompt beneficial secondary impacts throughout the local economy. The replacement of commercial facilities in a high hazard flood area would not be expected to have a long-term adverse economic impact related to any potential loss of structures.</p> |
| Energy Resources | <p>Cumulative Impacts. Energy consumption would increase over the life of the plan due to an increase in commercial services, overnight accommodations, and construction measures, but numerous energy-saving practices and devices would be incorporated. Based on increased visitation expected, vehicle use and boat use in general would increase over the life of the plan, increasing fuel consumption. Energy would continue to be consumed by actions other than commercial and visitor services, including operation of the water and wastewater treatment plants and maintenance activities (lawn mowing, repairs, etc). Resurfacing of the interior roadways and parking facilities and the removal of underground storage tanks would all have short-term, minor adverse impacts on energy consumption due to construction. However, with the improvements made by meeting LEED standards, under alternative D, energy consumption associated with the current and future uses would have an overall long-term, minor cumulative beneficial impact on energy consumption.</p> |

| Impact Topic | Alternative D - Preferred Alternative |
|---------------------------------------|--|
| Park Management and Operations | <p>Cumulative Impacts. The park would continue with plans for ongoing exotic plant control, mosquito control, fire management, landscape management, and continued facility maintenance, all of which would be responsibilities of the maintenance division. Visitors would continue to visit the site without overnight accommodations, and interpretive programs throughout the park would continue, including development of a wayside exhibit plan and the development of other recreational facilities in the area such as the Saltwater Paddling Trail and the Biscayne-Everglades Greenway. These projects would include the involvement of all divisions of Everglades National Park. Although these projects would require staff time and effort to implement, when considered with the negligible to minor adverse and moderate beneficial impacts, the cumulative impact would be long-term, minor, and adverse.</p> <p>Visitation would likely increase as visitors would be offered more opportunities at Flamingo, including overnight accommodations. Other actions that would contribute to cumulative impacts include landscaping and facility maintenance and interpretive programs. These projects would include the involvement of all Park divisions. Assuming that funding is available for all of these projects, when combined with the actions occurring at Flamingo, the cumulative impacts would be long-term, minor, and adverse. If funding is not received, impacts could be long-term moderate adverse, because the impact would be felt in other areas of the park.</p> <p>Alternative D would result in long-term, minor-to-moderate adverse cumulative impacts.</p> |

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APPENDIX B
FLOODPLAIN STATEMENT OF FINDINGS (ALTERNATIVE D)
Flamingo Commercial Services Plan
Environmental Assessment



United States Department of the Interior
NATIONAL PARK SERVICE

Everglades and Dry Tortugas National Parks
40001 State Road 9336
Homestead, Florida 33034-6733



In Reply Refer to:

L7615

JUN 02 2008

Memorandum

To: Chief, Water Resources Division, National Park Service
Attention: Bill Jackson *Bill*

From: Superintendent, Everglades and Dry Tortugas National Parks

Subject: Floodplain Statement of Findings, Flamingo Commercial Services Plan/EA

Attached please find the Floodplain Statement of Findings for the Flamingo Commercial Services Plan (CSP) / Environmental Assessment. In developing the CSP and the preferred alternative, the park has worked closely with your staff in coordination with Southeast Regional Office natural resources staff.

Gary Smillie and Kevin Noon from your office have been very helpful throughout the planning process. Their comments and policy guidance have been beneficial in developing the SOF in the context of the project's goals and the elements of the preferred alternative.

Please sign and return the document to:
Fred Herling
Flamingo CSP Project Manager
Everglades National Park
40001 SR 9336
Homestead, FL 33034

You may also contact Fred at 305-242-7704 should you have any questions regarding the SOF. Thank you for your continued support on this important project for Everglades National Park.

Dan B. Kimball

Dan B. Kimball

Attachment

STATEMENT OF FINDINGS
FOR
EXECUTIVE ORDER 11988 (Floodplain Management)

Flamingo Commercial Services Plan

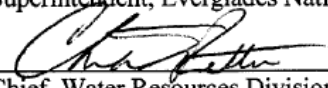
Environmental Assessment

Everglades National Park

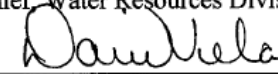
Recommended:

 5-30-2008
Superintendent, Everglades National Park Date

Concurred:

 6/4/08
Acting Chief, Water Resources Division, National Park Service Date

Approved:

 7-23-08
Director, Southeast Region, National Park Service Date

Everglades National Park
Flamingo Commercial Services Plan/Environmental Assessment
Preferred Alternative – Floodplain Statement of Findings
May 2008

Introduction

The largest developed area within Everglades National Park is the Flamingo area, located at the southernmost mainland point of the park, at the end of a 38-mile paved road that extends southwest from the main visitor center near Homestead, Florida. In 2005, the Flamingo area sustained heavy infrastructural damage as a result of two consecutive hurricanes. These storms caused overwhelming impacts to already aged facilities, and many of the visitor uses and services in Flamingo had to be shut down or reduced. The Flamingo Lodge, cottages, restaurant, gift shop, and cafe were closed due to the damage caused by strong winds and six to eight foot storm surges from Hurricanes Katrina and Wilma. Historically, Flamingo was the only area providing overnight accommodations, beyond tent and recreational vehicle (RV) camping, to park visitors. Due to the loss of available services and accommodations at Flamingo, the National Park Service (NPS) was asked by the public to expedite the process for determining the site's future. As a result, the park embarked on a planning process, through the development of a Commercial Services Plan and Environmental Assessment (CSP/EA), to identify options and make decisions about Flamingo. The park is considering repairing and/or replacing the damaged facilities.

The Draft EA was released for public review on November 17, 2007 and did not identify a preferred alternative, but did include a Floodplain Statement of Findings that covered all of the alternatives considered. Following receipt of public comment on the Draft EA, a preferred alternative was developed that integrated components of both action alternatives from the draft (alternatives B and C). The preferred alternative, referred to as alternative D, includes the construction of the lodge, pool, restaurant, and cottages. Certain facilities damaged by past hurricanes would also be rebuilt or replaced (amphitheater, NPS employee housing, maintenance facilities, concessioner housing, two backcountry campsites). The site design and the redevelopment of the Flamingo area would allow the area to function more efficiently than it did in the past, and would facilitate pedestrian and bicycle access and circulation. The lodge and cottages would be located in proximity to the marina and visitor center, and would be rebuilt as structures elevated to meet or exceed State of Florida and Monroe County requirements to avoid/minimize impacts from storms and hurricane events, while the RV campsite would remain at T Loop. A Flamingo circulator shuttle would transport visitors to key destinations within the Flamingo area and a "Yellow Bike" system would provide overnight guests with enhanced access to the lodging, marina, restaurant, and other visitor services, while reducing the frequency of private vehicle use. Eco Pond would remain a visitor use area while it continues to restore naturally in the coming years. As a result of this reconfiguration, approximately 50 acres within the Flamingo developed area would be restored to its prior natural conditions as part of the park's coastal prairie and mangrove ecosystems, including 28 acres at the former B and C Loops and 22 acres in the old lodge and cottage areas. Figure 1 depicts the site development and services proposed under the preferred alternative.

Justification for the Use of Floodplain

The Flamingo developed area totals about 600 acres and is located within a designated high hazard zone floodplain (see Figure 2). There is a history of flooding in the area, most recently with the storms related to hurricanes Katrina and Wilma in 2005 that inundated all of Flamingo. At that time, the lodge, cottages, restaurant, gift shop, marina store, some housing facilities, and the café were closed due to the damage caused by strong winds and storm surges, which reached levels of four to eight feet in various Flamingo

locations. Only the marina store has reopened. Although the NPS is under executive order and policy to reduce or eliminate development in floodplain, in the Flamingo area this is not possible because the entire area falls within the 100 year floodplain. As identified in Figure 2, the “VE” zone (100 year floodplain with storm wave hazard) extends about 1,000 feet in from the shoreline, and the “AE” zone (the rest of the 100 year floodplain without wave hazard) continues indefinitely landward. Most all of the Everglades National Park is in the 100 year floodplain. Therefore, the redevelopment of Flamingo must occur within the floodplain, but the extent of development, placement of structures, and types of structures and associated facilities can be selected to minimize impacts. The preferred alternative would elevate the lodge and cottage structures to a height that meets or exceeds State of Florida and Monroe County requirements to avoid/minimize impacts from storms and hurricane events. Due to the importance of the Flamingo area to Everglades National Park, this plan recognizes the value of designing and building new facilities in a sustainable way, with the NPS acknowledging there is some risk to the facilities and resources included as part of the CSP preferred alternative. At the same time, the plan commits to avoiding risk to people since there is almost always a 48 to 96 hour window to evacuate areas that are potentially threatened by a major storm event. This precautionary principle would always apply at Flamingo.

Rather than repeat information described in the Draft Plan/EA and the Preferred Alternative documents, this paragraph provides references to those documents as they relate to project floodplain conditions and impacts. The documents can be viewed at the NPS Planning, Environment, and Public Comment website: <http://parkplanning.nps.gov>, selecting “Everglades NP” from the drop down box, then “Flamingo CSP/EA”, and then going to “Document List” to view either the Draft Plan/EA or the Preferred Alternative. A description of floodplain resources is provided in the Draft CSP/EA, Chapter 3, page 27. Floodplain impacts for alternatives A, B and C are described in the Draft Plan/EA, Chapter 3, pages 38 – 39, and on page 22 of the Preferred Alternative (impacts are the same as alternative C). The basis for determining that a Statement of Finding for Wetlands is not required for this project is fully described in the Draft CSP/EA, Chapter 3, page 29. In short, the rebuilding of Flamingo as described in this project would occur within the developed area and affect only previously disturbed or filled areas. Areas proposed to be restored would not include any new disturbance of wetlands.

If adverse impacts to wetlands would occur from a proposed project, a Statement of Findings is prepared, unless the actions are accepted for various reasons provided in Procedural Manual 77-1, section 4.2(A). These include actions designed for restoring wetlands and water dependent actions that have minor impacts. As described more fully below in the analysis, the rebuilding or redesigning of Flamingo’s commercial services under any alternative would stay within the developed area and affect only previously disturbed or filled areas, thereby avoiding impacts to wetlands. Indirect impacts may include minor effects from use of boats in shallow areas and at launch sites; however, these are related to water dependent use and would generally result in negligible to minor and very localized effects. The chickees would be located below low low tide, out of the intertidal area, and no construction would occur on nearby islands. The restoration proposed for wetlands that had been previously filled for development would not include any new disturbance of wetlands, and it is expected that any area that would be restored to original grade would likely revert to wetland and develop an initial vegetation cover within about one year (Zimmerman, pers. comm., 2007). For these reasons, a Statement of Findings for wetlands was not required for this project.

Investigation of Alternative Sites/Site-Specific Flood Risk Impacts of the Preferred Alternative

Alternative A (No Action)

Under this alternative, concessions at Flamingo would function according to current uses, which primarily focus on day users. Only the campground and limited marina slips would be available for overnight use. Certain facilities damaged by past hurricanes would be rebuilt (amphitheater, NPS employee housing,

maintenance facilities, concessioner housing, backcountry chickees) (see EA, figure 2-1). The construction would occur primarily in the high hazard/storm surge hazard zone, with the exception of the maintenance facility that lies further inland. Lands where the lodge and cottages used to be sited would be restored; this area is also in the high hazard storm surge zone. Flood and storm surge risk would continue to include loss of structures, creation of debris, and damage from flooding. Overall, proposed construction and replacement of facilities would cover less than one acre of floodplain, with elevation of structures comprising most of the facilities to be rebuilt, thereby reducing the actual surface footprint considerably. An additional 28 acres of floodplain (the former B and C campground loops and a majority of the former lodge and cottage site) would be restored in the high hazard zone.

Alternative B – Flamingo Rebuilt

This alternative would involve construction of the lodge and cottage in the same general location, within the high hazard/storm surge zone. Additional areas (the former B and C campground loops) would be restored in the high hazard zone (see EA, figure 2-2). Risks of replacing structures in the floodplain would be the same as alternative A: flood damage and loss of structures, creation of debris, plus possible releases of materials from the lodge and restaurant facilities (e.g. swimming pool chlorine, oils and greases). Overall, proposed construction and replacement of facilities would cover about five acres of floodplain, with elevation of structures comprising most of the facilities to be rebuilt, thereby reducing the actual surface footprint considerably. An additional 50 areas of floodplain (the former B and C campground loops and a majority of the former lodge and cottage site) would be restored in the high hazard zone.

Alternative C – Flamingo Redesigned

This alternative would include the lodge and cottage construction in the same general area, but would relocate the RVs to the area next to the visitor center and add 40 ecotents in a portion of the area currently used for group and walk-in camping, set back from the Florida Bay shoreline. Additional areas of floodplain would be restored (the former B, C and T campground loops and a sizeable area around Eco Pond) (see EA, figure 2-4). Risks of replacing structures in the floodplain would be the same as alternatives A and B: flood damage and loss of structures, creation of debris, plus possible releases of materials from the lodge and restaurant facilities (e.g. oils and greases). Overall, proposed construction and replacement of facilities would cover about five acres of floodplain, with elevation of structures comprising most of the facilities to be rebuilt, thereby reducing the actual surface footprint considerably. An additional 87 acres of floodplain (the former B and C campground loops and a majority of the former lodge and cottage site) would be restored in the high hazard zone.

Alternative D – Preferred Alternative

The preferred alternative is largely a combination of elements from alternatives B and C, and would involve construction of the lodge (with a restaurant and swimming pool) and cottages near the visitor center, in the location formerly occupied by the old lodge, within the VE high hazard/storm surge zone. The RV campground would remain in the T loop, in the AE zone. About 40 ecotents and the replacement amphitheater would be added in a portion of the area currently used for group and walk-in camping, set back from the Florida Bay shoreline, but in the VE zone. Replacement housing would fall within the VE zone, and the maintenance shop would fall within the AE zone. Overall, proposed construction and replacement of facilities would cover about five acres of floodplain, with elevation of structures comprising most of the facilities to be rebuilt, thereby reducing the actual surface footprint considerably. An additional 50 acres of floodplain (the former B and C campground loops and a majority of the former lodge and cottage site) would be restored in the high hazard zone.

Impacts on floodplains would result from the continued presence of structures, replacement of structures, and continued day use of the Flamingo area, which is all within the 100-year floodplain. Existing structures would be susceptible to flooding and damage during hurricanes or large tropical storm events,

and any new facilities in the study area would be constructed within the floodplain, adding to the risk associated with hurricanes and storms. However, all new facilities except the maintenance shop would be raised to protect them against the forces of hurricanes and be built to “hurricane-proof” standards, which would also help reduce the surface area of the floodplain that is permanently covered with buildings and reduce losses from hurricanes. The maintenance shop would be built on an elevated fill pad and meet all required building codes. The continuation of the uses and replacement of structures in the Flamingo area that are not elevated within a floodplain would result in long-term localized minor to moderate adverse impacts. However, all new structures would be elevated one way or another. The ecotents and possibly some of the concessioner housing would be designed to be seasonal, and would be removed during the off season and in the case of impending hurricanes. Removal of the former lodge buildings and cottages would eliminate the potential risk associated with their presence, and the restoration of the majority of the area where they stood, along with the restoration of the B and C loops in the campground, would restore 50 acres of the natural floodplain of the Flamingo area and remove hazards from human use in these areas, a long-term, localized, moderate beneficial effect.

Conclusion

The continuation and rebuilding of the uses and structures in the Flamingo area would result in long-term localized moderate adverse impacts on floodplains, but there would be moderate beneficial effects from the removal of the old lodge and cottage structures, consolidation and elevation of structures, use of flood resistant design, and restoration of approximately 50 acres within the Flamingo developed area to its prior natural conditions as part of the park’s coastal prairie and mangrove ecosystems, including 28 acres at the former B and C Loops and 22 acres in the old lodge and cottage areas (see Figure 1 for location of floodplain areas to be restored). Alternative D would not produce major adverse impacts on floodplains.

The conservation and protection of floodplain resources is (1) necessary to fulfill specific purposes identified in the establishing legislation of the park, (2) key to the natural and cultural resource integrity of the park or opportunities for enjoyment of the park, and (3) identified as a goal in park management and policy documents or other National Park Service planning documents. Consequently, there would be no impairment of floodplains as a result of the implementation of alternative D.

Flood Mitigation Plans

- The overall developed footprint in the 100-year floodplain would be reduced as much as possible, given the limits and development concepts for each alternative.
- All new structures would be constructed on previously disturbed areas that have already been filled. No new fill is anticipated unless necessary for foundation purposes. No areas that are not already filled would be subject to filling or grading.
- In accordance with EO 11988, flood protection would be provided by elevating permanent accommodations, which would be built to the 2004 Florida Building Code standards for a High Hazard Hurricane Zone (anticipated to be about 15 feet for 1st floor elevation). The NPS would operate the area using the Everglades National Park Hurricane Plan, which is coordinated with the Monroe County Emergency Management Department. The replacement employee housing and concessioner housing would be elevated structures; the maintenance facility would meet all hurricane building codes.
- The alternatives also include the restoration of large tracts of previously developed land (see next page for details). Any sites no longer needed for replacement of facilities would be restored. This would include portions of the areas where the lodge buildings and duplex cottages stood (under all alternatives), as well as areas that would no longer be used due to consolidation and reconfiguring of the overall Flamingo area. The exact type of restoration would depend on the size and location of the area, but would generally include removal of building materials and fill or other impervious surface materials (paving), followed by grading to historic contours. Then,

either the area would be allowed to revegetate naturally (coastal prairie habitat in most cases), or native species would be planted consistent with desired vegetative conditions and the surrounding landscape. NPS would monitor the area to assess the progress of revegetation and/or any plantings and the presence of any non-native species.

- Site restoration would result in the reestablishment of about 50 acres coastal prairie and mangrove habitat in the floodplain (see Figure 1 Areas to be Restored). If restored to coastal prairie or mangrove communities, vegetation will return that will help to reduce the effects of storm surges and flooding in the area.
- Construction of the lodge, cottage, ecotent, and RV parking will use permeable paving material to increase infiltration and reduce runoff.
- The proposed ecotents and possibly some concessioner housing would be designed to be seasonal, so that all but the foundations could be removed during the off-season, minimizing the potential for damages.

Summary

Because all of the Flamingo area is in a 100-year floodplain, the proposed commercial services and associated facilities proposed for alternative D must be located in a floodplain; there are no other siting alternatives. The continuation of uses and rebuilding of structures and facilities in the Flamingo area would result in risks from the possibility of flooding and wind/storm surge damage, with localized adverse impacts on floodplains, but there would be moderate beneficial effects from the consolidation of facilities, elevation of structures to standards described above, use of flood resistant design, and restoration of a large area of previously disturbed floodplain. Therefore, floodplain values would be protected to the maximum extent possible and potential flood hazards would be minimized.

The National Park Service concludes that there is no practical alternative for replacement of the lodge, cottages, camping facilities, and other ancillary facilities as described above for alternative D, the preferred alternative. Mitigation and compliance with regulations and policies to prevent impacts to water quality, floodplain values, and loss of property or human life would be strictly adhered to during and after the construction. Individual permits with other federal and cooperating state and local agencies would be obtained prior to construction activities. No long-term adverse impacts would occur from the Preferred Alternative. Therefore, the National Park Service finds the Preferred Alternative to be acceptable under Executive Order 11988 for the protection of floodplains.

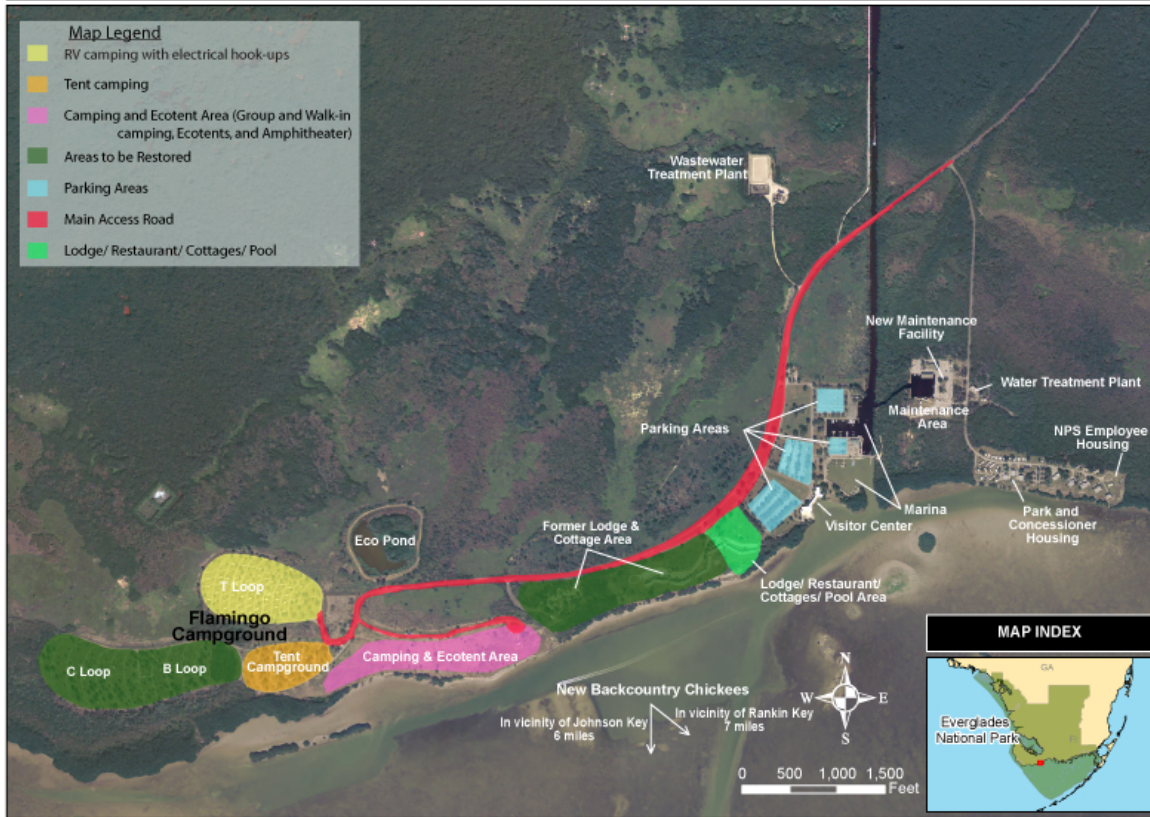


Figure 1: Alternative D (Preferred Alternative)

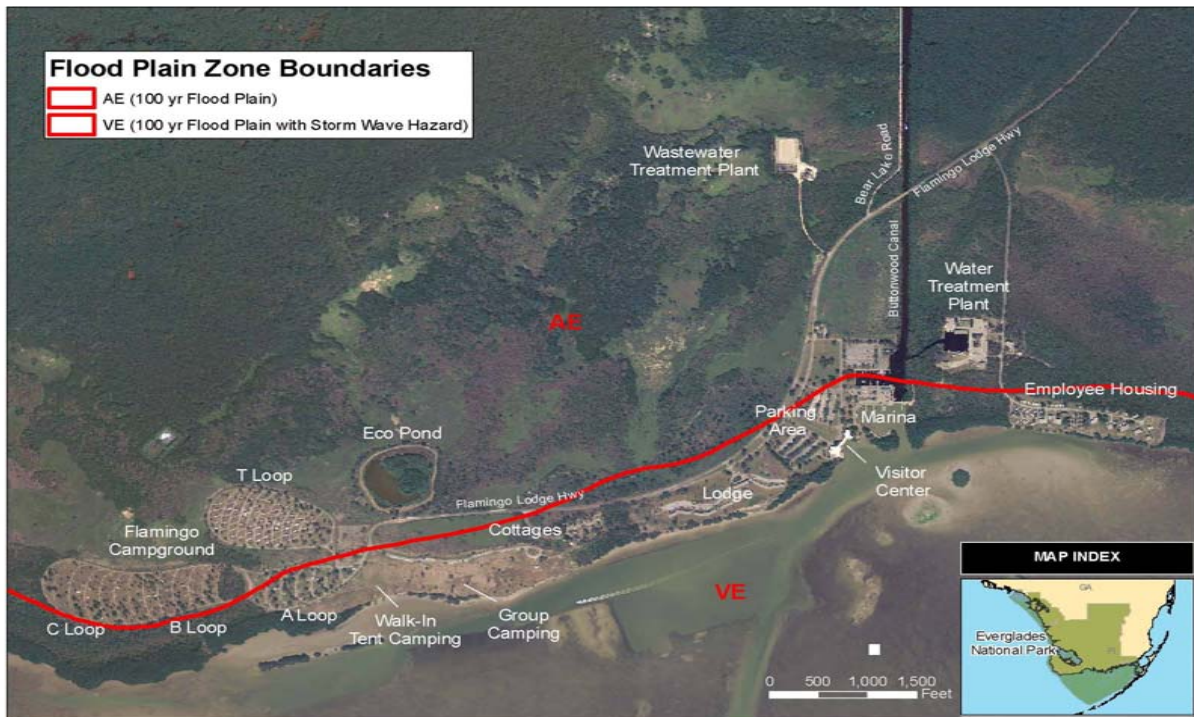


Figure 2 – FEMA Flood Rate Insurance Map No. 12087c0675k (FEMA 2006; Dated 2/18/05)

APPENDIX C
AGENCY CONSULTATION LETTERS
Flamingo Commercial Services Plan
Environmental Assessment



FLORIDA DEPARTMENT OF STATE

Kurt S. Browning

Secretary of State

DIVISION OF HISTORICAL RESOURCES

May 16, 2008

Mr. Dan Kimball, Superintendent
National Park Service
Everglades & Dry Tortugas National Parks
40001 State Road 9336
Homestead, FL 33034

Re: SHPO/DHR Project File No.: 2007-9073
Received: November 26, 2007 / Additional comments received: May 12, 2008
Draft Flamingo Commercial Service Plan / Environmental Assessment
Everglades National Park
Monroe County, Florida

Dear Mr. Kimball:

This office received a copy of the November 2007 draft documents last fall and we apologize for the lateness of this response. Overall the Service Plan and the Environmental Assessment were very thorough, and the alternative analyses address the need to consider the potential significance of the Mission 66 resources and other cultural resources throughout the decision making processes for Flamingo.

Since the submittal arrived in November, staff from this office visited the visitor center complex this year while on vacation. The storm damage to the Mission 66 visitor center building was quite obvious. Noted during the visit by Laura Kammerer and David Ferro, both Deputy SHPOs, was the architectural landscape plan associated with the center complex. Particularly the flag yardarm/pole and the large grassed entrance area which it anchors in front of the visitor center building with radiating parking areas on either side. Laura and Dave met briefly with Melissa Memory, Chief of Cultural Resources, and friend from a past job here with the Division of Historical Resources, at her office before leaving the park. They discussed this effort and their informal observations of the visitor center complex. In a book picked up in Key West during that same vacation, Laura and Dave found an aerial photograph of one of the RV camping loops, possibly T (photocopy enclosed). The aerial view of campground loop with its fish scale-like road system depicts the distinctiveness of this element of the Mission 66 landscape design at Flamingo.

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

☐ Director's Office
(850) 245-6300 • FAX: 245-6436

☐ Archaeological Research
(850) 245-6444 • FAX: 245-6452

✓ Historic Preservation
(850) 245-6333 • FAX: 245-6437

☐ Historical Museums
(850) 245-6400 • FAX: 245-6433

☐ South Regional Office
(904) 416-2115 • FAX: 416-2149

☐ North Regional Office
(850) 245-6445 • FAX: 245-6435

☐ Central Regional Office
(813) 272-3843 • FAX: 272-2340

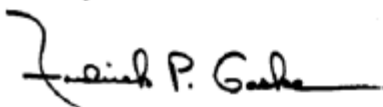
Mr. Dan Kimball
May 16, 2008
Page 2

With these comments noted, as the National Park Service carries out its commitment to complete determinations of eligibility for Mission 66 and other resources at Flamingo, we wish to emphasize the importance of the original landscape plan and its various pieces. It is important to complete the identification of all of the significant resources at Flamingo, prior to the completion redevelopment plans, so where possible, with updating and renovations, the Mission 66 history at Flamingo can be incorporated into short and long term redevelopment plans.

We concur that with the commitments made in the document reviewed, that Alternative C – “Flamingo Redesigned”, the identified preferred alternative, will have no significant impact on historic resources.

We are encouraged to know that Flamingo will continue to be a vital part of the overall Everglades Park experience, and this office looks forward to continued consultation and coordination with your staff in completion of the identification of significant resources, completion of the final Commercial Services Plan for Flamingo and its implementation. If you have any questions concerning the brochure, or need any assistance, please contact Laura Kammerer, Deputy State Historic Preservation Officer for Review and Compliance, at 850-245-6333 or lkammerer@dos.state.fl.us.

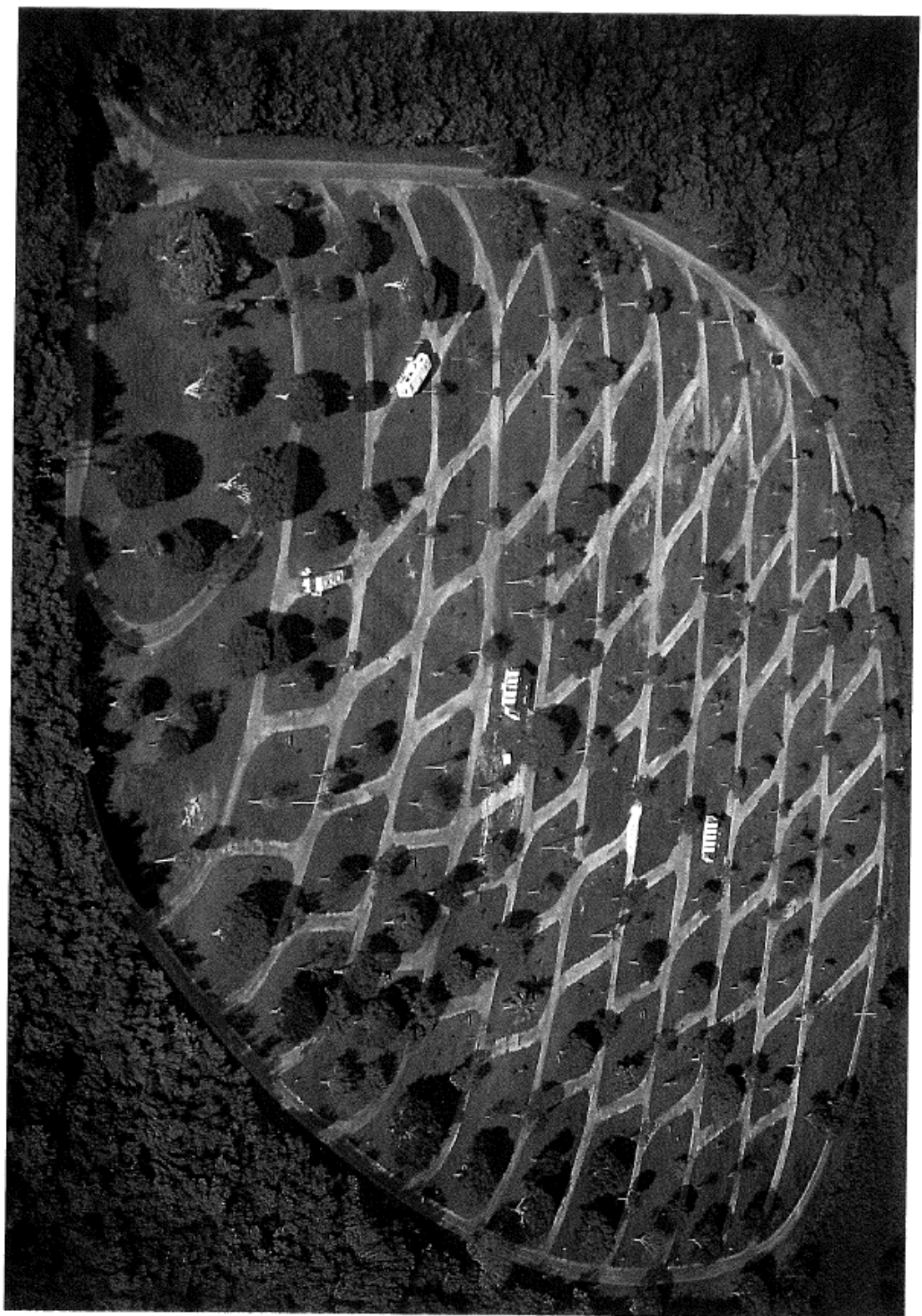
Sincerely,

A handwritten signature in black ink, appearing to read "Frederick P. Gaske". The signature is fluid and cursive, with a long horizontal stroke at the end.

Frederick P. Gaske, Director, and
State Historic Preservation Officer

Xc: Melissa Memory, Everglades National Park

Enclosure



Unusually vacant, this RV park at Flamingo in the Everglades National Park has a pineapple shape when seen from above.



**United States Department of the Interior
NATIONAL PARK SERVICE**



Everglades and Dry Tortugas National Parks
40001 State Road 9336
Homestead, Florida 33034

In Reply Refer to:

7615-FY06-013

May 12, 2008

Mr. Frederick Gaske
State Historic Preservation Officer
R.A. Gray Building
500 S. Bronough Street
Tallahassee, FL 32399-0250

Subject: Section 106 Compliance – Flamingo Commercial Services Plan/EA
Commitment to National Historic Preservation Act Section 106 Requirements
Everglades National Park, Monroe County, Florida

Dear Mr. Gaske:

As a follow up to our November 19, 2007 letter requesting consultation on our Flamingo Commercial Services Plan/EA, we request comment to ensure that our proposed actions to not adversely affect significant historical properties. In order to further clarify the history and seek your concurrence on this project, we have put together the following briefing statement:

Purpose

To clearly identify the commitment of the National Park Service (NPS) and the Florida State Historic Preservation Office (SHPO) to pursue ongoing consultation for the Flamingo Commercial Services Plan / Environmental Assessment (CSP/EA) to fulfill National Historic Preservation Act Section 106 compliance requirements.

Background

Ongoing consultation between the NPS (Southeast Regional Office and Everglades National Park) and the Florida SHPO have been ongoing since 2006 regarding National Register of Historic Places (NRHP) eligibility for Mission 66 resources within the Flamingo CSP study area. Those consultations, including a February 2006 site visit (Brian Coffey, NPS Historian; Carl Shiver, Florida SHPO Historian; and Fred Herling, NPS Planner), led to an initial assessment that certain Mission 66 resources were likely eligible for the NRHP (including visitor center, fueling station, original employee housing buildings, boat yard canopy) while other resources (including lodge buildings, cottages, maintenance facilities) were unlikely eligible due to loss of integrity or severe damage due to hurricane and storm impacts. It was recognized that the NPS would develop the Determination of Eligibility (DOE) for Mission 66 resources and complete consultation with the Florida SHPO regarding eligibility and the identification of contributing and non-contributing features. The NPS is currently working on the DOE and expects to complete that work and consult with the Florida SHPO in 2008.

Consultation for the demolition of the lodge and cottages took place in 2006 and 2007. For the lodge a DOE was prepared by the NPS on July 14, 2006 and the Florida SHPO concurred on May 3, 2007. The NPS and Florida SHPO corresponded on the eligibility of the cottages

between April and July 2006 and on July 14, 2006 the Florida SHPO concurred that the cottage structure were not eligible.

Flamingo CSP

Consultation on the Flamingo CSP between the NPS and Florida SHPO took place in 2006 during project scoping (see Draft CSP / EA Appendix B for correspondence) and 2007 during the Draft CSP / EA review process (see attached letter dated November 19, 2007).

The cultural resource impact analysis for the Preferred Alternative (Alternative D) states, "Because there would be limited ground-disturbing activity in previously undisturbed areas, there is potential for this alternative to expose currently unknown archeological resources. There are artifacts and features associated with a late 19th/early 20th century occupation of the community, including significant historic roads and associated canals. There are no known intact prehistoric archeological resources in the project area. Significant historic Mission 66 resources would be preserved. With mitigation, there would be long-term, minor, adverse impacts to cultural resources as a result of implementation of alternative D."

A full analysis of cultural resources impacts is described in the Draft CSP / EA on pages 3-85 through 3-95. Based on the alternatives described in the Draft CSP / EA and the Preferred Alternative approved in this Finding of No Significant Impact (FONSI) the National Park Service concluded that there would be no adverse effects on cultural resources. This conclusion is based on the following two commitments and mitigation conditions:

Commitments

1. the Flamingo CSP describes a conceptual plan for future facility and program development that requires additional site planning and design work, as well as additional permitting and consultation, and that prior to any ground disturbing, demolition, or new facility development activity taking place, the Determination of Eligibility process for Mission 66 and other historic resources would be concluded based on consultation between the NPS and Florida SHPO, and
2. for those facilities that may be historically significant, but suffered compromised integrity by storm surge, wind and rainfall from hurricanes Katrina and Wilma, there would be additional consultation between the NPS and Florida SHPO on mitigation requirements before any demolition or alteration occurred.

Mitigation Conditions

- No ground disturbing activity or demolition associated with the implementation of the Flamingo CSP would occur prior to the completion of the Determination of Eligibility for Mission 66 resources between the National Park Service and the Florida State Historic Preservation Office.
- Complete a Cultural Resource Survey to identify resources in the area of potential effects (APE) for the Preferred Alternative.
- Preserve significant Mission 66 resources which would likely include the Visitor Center, the service/fueling station, original housing units, and boat basin canopy, that are located in the primary study area.
- Mission 66 resources would be fully documented according to SHPO standards before alteration or demolition, if necessary.

- Any architectural development in the Flamingo area would be compatible with the historic structures or any historic district that is proposed, as appropriate.
- Site monitoring if any excavation exceeds the depth of existing ground disturbance. In the event that cultural resources are encountered during any necessary excavation work, project work would be halted and the discovery process would be initiated.
- On-going tribal consultation would be conducted for all proposed undertakings.

Thank you for your review of this project to ensure that we are in accordance with §106 of the National Historic Preservation Act as we move forward with this timely project.

Sincerely,

Melissa Memory

Melissa Memory
Chief of Cultural Resources



**United States Department of the Interior
NATIONAL PARK SERVICE**



Everglades and Dry Tortugas National Parks
40001 State Road 9336
Homestead, Florida 33034

In Reply Refer to:

7615-FY06-013

November 19, 2007

Mr. Frederick Gaske
State Historic Preservation Officer
R.A. Gray Building
500 S. Bronough Street
Tallahassee, FL 32399-0250

Subject: Section 106 Compliance for the Flamingo Commercial Services Plan /
Environmental Assessment
Everglades National Park, Monroe County, Florida

Dear Mr. Gaske:

The Draft Flamingo Commercial Services Plan/Environmental Assessment (Draft Plan) is available for public review and comment. The Draft Plan analyzes 3 alternatives for reestablishing commercial services and facilities at Flamingo destroyed by hurricanes in 2005.

In accordance with the National Environmental Policy Act, the process and documentation for preparing the Flamingo CSP/EA has been used to comply with §106 of the National Historic Preservation Act. Through the draft Environmental Assessment, the National Park Service has determined that for each of the three alternatives there would be no adverse effects on cultural resources.

I have enclosed a CD of the Draft Plan for your review and comment, as this is the document for assessing effects on cultural resources within the Flamingo area of Everglades National Park. As required by 36 CFR 800, the Advisory Council on Historic Preservation has been notified regarding inclusion of Section 106 compliance within the Flamingo CSP/EA process.

Should you have any questions, please contact Fred Herling, Supervisory Park Planner, Planning and Compliance at Everglades National Park at 305-242-7704 or by email at fred_herling@nps.gov.

Sincerely,

Dan B. Kimball
Superintendent

Enclosure



United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Florida Ecological Services Office
1339 20th Street
Vero Beach, Florida 32960



May 21, 2008

Memorandum

To: Dan Kimball, Superintendent, Everglades National Park
Attention: Fred Herling

From: Paul Souza, Field Supervisor, South Florida Ecological Services Office
Allen P. Webb

Subject: Everglades National Park: Reconstruct Flamingo Commercial Services. National Park Service No. L7615; Service Log No. 41420-2008-FA-0610

Everglades National Park (ENP) proposes to redevelop the Flamingo area, which would allow the area to function more efficiently for visitors, the concessioner and the park than it did in the past. The new design would facilitate pedestrian and bicycle access and circulation throughout the Flamingo area. The lodge and cottages would be located in proximity to the marina and visitor center, while the RV campsite would remain at T Loop. A Flamingo circulator shuttle would transport visitors to key destinations within the Flamingo area and a "Yellow Bike" system would provide overnight guests with enhanced access to the marina, restaurant, lodging and other visitor services, while reducing the frequency of private vehicle use.

Specific actions include the following:

- Demolition of the lodge buildings and cottages
- Restoration to natural conditions previously disturbed areas within the Flamingo developed area that are no longer needed for facilities
- Maintenance of the marina area including the fueling stations, marina basins and marina store
- Preservation of the historically significant Mission 66 visitor center and service station
- Reconstruction of the amphitheater
- Replacement of hurricane-damaged facilities (employee housing, concessioner housing, maintenance facilities, and backcountry campsites)
- Incorporation of 2004 Florida Building Code requirements and design to address effects on an area highly susceptible to major weather events (e.g., hurricanes) and vulnerability to climate change (e.g., sea level rise)
- Incorporation of Architectural Barriers Act Accessibility Standards and Americans With Disabilities Act design and accessibility requirements



- Use of integrated pest management (IPM) and sustainable maintenance practices
- Incorporation of sustainable design principles

As a result of this reconfiguration, approximately 50 acres within the Flamingo developed area would be restored to their previous natural conditions, including 28 acres at the former B and C Loops and 22 acres in the old lodge and cottage areas.

The ENP has determined that the project “may affect, but is not likely to adversely affect” (MANLTAA) on the following species:

| Listed Species | Scientific Name | Status | Determination |
|----------------------------|---------------------------------------|------------|---------------|
| Stock Island tree snail | <i>Orthalicus reses</i> | Threatened | MANLTAA |
| American crocodile | <i>Crocodylus acutus</i> | Threatened | MANLTAA |
| Eastern indigo snake | <i>Drymarchon corais couperi</i> | Threatened | MANLTAA |
| Wood stork | <i>Mycteria americana</i> | Endangered | MANLTAA |
| Cape Sable seaside sparrow | <i>Ammodramus maritimus mirabilis</i> | Endangered | MANLTAA |
| Everglade snail kite | <i>Rostrhamus sociabilis plumbeus</i> | Endangered | MANLTAA |
| Bald eagle | <i>Haliaeetus leucocephalus</i> | Threatened | MANLTAA |
| Mangrove fox squirrel | <i>Sciurus niger</i> | Candidate | MANLTAA |
| Florida panther | <i>Felis concolor coryi</i> | Endangered | MANLTAA |
| West Indian manatee | <i>Trichechus manatus</i> | Endangered | MANLTAA |

The Fish and Wildlife Service (Service) has reviewed the plans, maps, and other information provided by ENP for the proposed project, including the conservation measures proposed to reduce adverse effects to federally listed threatened and endangered species. Based on this information, the Service concurs with ENP’s determinations. In addition, the Service believes the project will not significantly affect fish and wildlife resources in the area.

If you have any questions regarding this memorandum, please contact Winston Hobgood at 772-562-3909, extension 306.



**United States Department of the Interior
NATIONAL PARK SERVICE**

Everglades and Dry Tortugas National Parks
40001 State Road 9336
Homestead, Florida 33034



In Reply Refer to:

L7615-FY06-013

November 19, 2007

Mr. Paul Souza
Field Supervisor, South Florida Field Office
U.S. Fish and Wildlife Service
1339-20th Street
Vero Beach, FL 32960

Dear Mr. Souza:

The Draft Flamingo Commercial Services Plan/Environmental Assessment (Draft Plan) is available for public review and comment. The Draft Plan analyzes 3 alternatives for reestablishing commercial services and facilities at Flamingo destroyed by hurricanes in 2005.

Enclosed for your review and comment is a CD of the Draft Plan. On the back of this letter is a table of the federally listed endangered, threatened, and candidate species that our data suggest have the potential to occur in the study area. Through the draft Environmental Assessment, the National Park Service has determined that implementation of any alternative is not likely to adversely affect species under Section 7 of the Endangered Species Act.

We look forward to working cooperatively with you on the planning and implementation of this project. If you have any questions or desire more information, please contact Fred Herling at (305) 242-7704 or by e-mail at fred_herling@nps.gov.

Thank you for your time and interest in this important project.

Sincerely,

Dan B. Kimball
Superintendent

Enclosure

Federally listed species with potential to occur in the Flamingo area.

| Common name | Species name | Federal status |
|----------------------------|--|-----------------------|
| Stock Island tree snail | <i>Orthalicus reses</i> | Threatened |
| American crocodile | <i>Crocodylus acutus</i> | Endangered |
| Eastern indigo snake | <i>Drymarchon corais couperi</i> | Threatened |
| Wood stork | <i>Mycteria americana</i> | Endangered |
| Cape Sable seaside sparrow | <i>Ammodramus maritimus mirabilis</i> | Endangered |
| Everglade snail kite | <i>Rostrhamus sociabilis plumbeus</i> | Endangered |
| Bald eagle | <i>Haliaeetus leucocephalus</i> | Threatened |
| Mangrove fox squirrel | <i>Sciurus niger</i> | Candidate |
| Florida panther | <i>Felis concolor coryi</i> | Endangered |
| West Indian manatee | <i>Trichechus manatus</i> | Endangered |
| Miami blue butterfly | <i>Cyclargus thomasi bethunebakeri</i> | Candidate |
| Cape Sable thoroughwart | <i>Chromolaena frustrate</i> | Candidate |



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office
263 13th Ave. South
St. Petersburg, FL 33701-5505
(727) 824-5312, FAX (727) 824-5309
<http://sero.nmfs.noaa.gov>

JUN 19 2008

F/SER31:SN

Mr. Fred Herling
Supervisory Park Planner
Everglades and Dry Tortugas National Parks
40001 SR 9336
Homestead, FL 33034

Re: Flamingo Commercial Services Plan (Alternative D)

Dear Mr. Herling:

This responds to your e-mail dated April 30, 2008, requesting our review and comments on the Everglades National Park's Draft Flamingo Commercial Services Plan (Alternative D). On November 3, 2006, we provided comments on the Alternatives A through C. We stated that we could not determine whether the improvements to the Flamingo area would affect listed species under our purview (five species of sea turtles: leatherback, Kemp's ridley, loggerhead, hawksbill, and green; and the smalltooth sawfish) due to the lack of project-specific information (construction methods, timing, and location).

Alternative D includes the following elements:

- Demolition of lodge and cottage buildings
- Restoration of previously disturbed areas not planned for redevelopment
- Maintenance of the marina area facilities
- Preservation of the Mission 66 Visitors Center and Services Station
- Reconstruction of the amphitheater
- Replacement of hurricane-damaged facilities
- Incorporation of 2004 Building Code Requirements
- Incorporation of Architectural Barriers Act Accessibility Standards and Americans with Disabilities Act design requirements
- Use of integrated pest management practices
- Incorporation of sustainable design principles
- Avoidance of direct impacts on wetlands

Although Alternative D integrates important elements from Alternatives B and C from the Everglades National Park's Draft Flamingo Commercial Services Plan, it is still lacking project-specific information necessary to determine whether the proposed



projects may affect listed species under our purview. Habitats (red mangroves, shallow water depth areas near the shoreline, and euryhaline waters) within the Everglades National Park (ENP) are critical to the conservation and recovery of the endangered smalltooth sawfish. Benthic habitats located within the ENP are also utilized and important to listed sea turtles.

Based on the lack of project-specific information in the Everglades National Park's Draft Flamingo Commercial Services Plan (Alternative D) we cannot determine if the future projects may affect our listed species. NMFS will consult under section 7 of the Endangered Species Act, once project-specific information is available and you request section 7 consultation.

We appreciate your continued cooperation in the conservation of listed species and look forward to working with you and your staff in the future. Questions or comments on this letter should be directed to the attention of Shelley Norton by phone (727-824-5312) or e-mail (shelley.norton@noaa.gov).

Sincerely,



David M. Bernhart
Assistant Regional Administrator
for Protected Resources

File: 1514-220.4. A
Ref: T/SER/2008/02666



**United States Department of the Interior
NATIONAL PARK SERVICE**

Everglades and Dry Tortugas National Parks
40001 State Road 9336
Homestead, Florida 33034



In Reply Refer to:

L7615-FY06-013

November 19, 2007

David Bernhardt, Asst. Regional Admin.
National Marine Fisheries Service
Protected Resources Division
263 13th Avenue South
St. Petersburg, FL 33701

Dear Mr. Bernhardt:

The Draft Flamingo Commercial Services Plan/Environmental Assessment (Draft Plan) is available for public review and comment. The Draft Plan analyzes 3 alternatives for reestablishing commercial services and facilities at Flamingo destroyed by hurricanes in 2005.

Enclosed for your review and comment is a CD of the Draft Plan. On the back of this letter is a table of the federally listed endangered, threatened, and candidate species that our data suggest have the potential to occur in the study area. Through the draft Environmental Assessment, the National Park Service has determined that implementation of any alternative is not likely to adversely affect species under Section 7 of the Endangered Species Act.

We look forward to your participation in the planning process. Should you have any questions about the project, please contact Fred Herling, Supervisory Park Planner, by calling 305-242-7704, or by email at fred_herling@nps.gov.

Thank you for your time and interest in this project.

Sincerely,

Dan B. Kimball
Superintendent

Enclosure

Federally listed species with potential to occur in the Flamingo area.

| Common name | Species name | Federal status |
|-----------------------------|-------------------------------|-----------------------|
| Smalltooth sawfish | <i>Pristis pectinata</i> | Proposed |
| Atlantic hawksbill turtle | <i>Eretmochelys imbricate</i> | Endangered |
| Green turtle | <i>Chelonia mydas</i> | Endangered |
| Atlantic Ridley turtle | <i>Lepidochelys kemp</i> | Endangered |
| Atlantic leatherback turtle | <i>Dermochelys coriacea</i> | Endangered |
| Loggerhead turtle | <i>Caretta caretta</i> | Threatened |

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APPENDIX D
MITIGATION MEASURES
Flamingo Commercial Services Plan
Environmental Assessment

The following mitigation measures (mostly from the Draft Plan/EA) would apply to the preferred alternative. Mitigation measures would be used to prevent or minimize potential adverse impacts associated with the preferred alternative. These measures were included in the evaluation of impacts of all action alternatives. Mitigation measures that could be undertaken during project implementation include, but are not limited to:

WILDLIFE AND WILDLIFE HABITAT

- The use of previously undisturbed areas would be minimized to the extent possible by selectively choosing staging areas, parking all vehicles on existing roads and parking lots, and clearly defining and marking construction zones and perimeters.
- Steps would be taken to minimize the introduction of non-native species and could include washing equipment before entering the park; minimizing disturbances; initiating revegetation of disturbed areas immediately after construction; salvaging topsoil and native vegetation from the area; and limiting the amount of topsoil imported.
- Revegetation efforts would include using seeds from native species during revegetation; monitoring reclamation; and implementing exotic species control as necessary.
- Pre- and post-construction erosion control BMPs would be implemented, including the installation and inspection of silt fences, straw bale barriers, sediment traps, or other equivalent measures, and revegetation of area.
- Pre- and post-survey construction surveys for selected species (e.g., crocodiles, Eastern indigo snakes) would be implemented.
- Spill prevention, control, and countermeasure procedures, as well as stormwater pollution prevention measures, would be implemented to reduce the potential for petroleum products from leaking equipment or vehicles to reach surface waters.
- Environmental awareness and interpretive programs (e.g., guided boat tours, guided tours at Eco Pond, step-on guides for buses) would be implemented to help educate visitors with the intent of reducing impacts on wildlife and wildlife habitat.
- As per NPS 2006 Management Policies, artificial lighting would not be used in locations where its presence could disrupt wildlife dependent on the dark; minimal-impact lighting techniques used (e.g., consideration of yellow versus white lights, use of timers); artificial lighting would be shielded and directed, where necessary, in consideration of natural night sky conditions.
- Native vegetation would be used in all manicured or landscaped areas, and any landscaping done during site development and consolidation of facilities would emphasize reduction of grass fields.

THREATENED, ENDANGERED, OR SPECIAL STATUS SPECIES

- Construction activities occurring near sensitive habitats would be timed to avoid periods of breeding, nesting, and rearing of young.
- Pre-construction surveys would be conducted to identify any federal- and state-listed species occurring in the area. Should individuals or nest sites be identified, additional measures would be taken to avoid impacts (e.g., fencing nest sites, providing information to contractors about the species).
- Construction of the new chickees would include standard manatee and sea turtle protection measures, including no wake zones and monitoring during construction.
- Measures listed under “Protection of Wildlife and Wildlife Habitat” and other resource protection mitigation would also serve to reduce impacts on special status species.
- Construction would also follow the National Marine Fisheries Service “Sea Turtle and Smalltooth Sawfish Construction Conditions”, attached at the end of this mitigation section.

WATER RESOURCES

- Measures listed under “Protection of Wildlife and Wildlife Habitat” related to use of pre- and post-construction erosion control BMPs, spill prevention, control, and countermeasure procedures, and stormwater pollution prevention would also protect water quality.
- Construction would be limited to previously disturbed areas, avoiding wetland habitats.
- A spill prevention, control, and countermeasures plan would be completed and implemented for any fuel storage tanks, which would meet all applicable standards for construction and leak detection. Areas used for refueling would be limited to areas where these activities currently occur.
- Equipment containing fuels would be checked frequently for leaks.
- Environmental awareness and interpretive programs (e.g., guided boat tours, guided tours at Eco Pond, step-on guides for buses) would include information about water quality, wetlands, and floodplains to help educate visitors with the intent of reducing impacts on these resources.
- The overall developed footprint in the 100-year floodplain would be reduced where possible. In accordance with EO 11988, flood protection would be provided by elevating all structures, which would be built to the 2004 Florida Building Code standards for a High Hazard Hurricane Zone. The NPS would operate the area using the Everglades National Park Hurricane Plan, which is coordinated with the Monroe County Emergency Management Department.
- Construction of the chickees in proximity to Rankin and Johnson Keys would include the use of silt curtains to contain disturbed sediments and reduce water quality impacts.

SOILS AND GEOLOGY

- Measures listed under “Protection of Wildlife and Wildlife Habitat” related to use of pre- and post-construction erosion control BMPs, spill prevention, control, and countermeasure procedures, and stormwater pollution prevention would be followed to protect soils from erosion and contamination.

- Any construction would be limited to previously disturbed areas, limiting impacts to soils, and only those areas absolutely necessary for construction would be cleared and grubbed.
- Construction/demolition activities would be limited to times when the areas are not too wet and able to support the weight of the vehicles and other construction equipment.
- Erosion and sediment control BMPs would be inspected and maintained on a regular basis and after each measurable rainfall to ensure they are functioning properly.

AIR QUALITY

- Low sulfur diesel fuel would be used in off-road construction equipment.
- Where practicable, diesel engine retrofit technology would be used in off-road equipment to further reduce emissions. Such technology could include Diesel Oxidation Catalyst/Diesel Particulate Filters, engine upgrades, engine replacements, or combinations of these strategies.
- Unnecessary idling times on diesel-powered engines would be limited to 3 to 5 minutes.
- Water or appropriate liquids would be used for dust control during demolition, land clearing, grading, on materials stockpiled on the ground surfaces, and other activities.
- Open-body trucks for transporting materials would be covered.
- Dust related to the construction site would be controlled through a soil erosion sediment control procedure that includes:
 - Spraying of a suppressing agent on dust pile (non-hazardous, biodegradable);
 - Containment of fugitive dust; and
 - Adjustment for meteorological conditions as appropriate.
- "Clean Fuel" technology would be considered and used, if possible, for the proposed tram and internal shuttle.

WILDERNESS

- Measures listed above under "Protection of Wildlife and Wildlife Habitat", "Protection of Water Quality", etc. would serve to protect wilderness values and quality.
- Wilderness permitting for use of backcountry areas would include provision of educational materials about wilderness values and protection measures.
- Construction of the new chickees near Rankin and Johnson Keys (in submerged wilderness) would follow the minimum tool analysis for construction and would include provisions to minimize impacts to natural resources that contribute to wilderness values, including use of silt curtains during construction.

CULTURAL RESOURCES

- A Cultural Resource Survey would be performed to identify resources in the area of potential effects (APE) for the preferred alternative.

- Monitoring will be done if any excavation exceeds the depth of existing ground disturbance. In the event that cultural resources are encountered during any necessary excavation work, project work would be halted and the discovery process would be initiated.
- Historic or important structures (Mission 66) would be fully documented by a qualified architectural historian before demolition, if necessary.
- Any architectural development in the Flamingo area would be compatible with the historic structures or any historic district that is proposed, as appropriate.
- On-going tribal consultation would be conducted for all proposed undertakings.

VISITOR USE AND EXPERIENCE, INCLUDING NIGHT SKY AND SOUNDSCAPES

- Construction information and general information about the redevelopment of Flamingo would be posted at the park, distributed to visitors, and made available on the park's web site. Signage and notices would be used to inform visitors about the purpose of the project and to protect visitor and staff safety during construction activities.
- When possible, construction activities would be timed to avoid high visitor use periods.
- Artificial lighting, including minimum illumination levels, light-emitting diodes (LEDs), limited color spectrum (e.g., yellow) lights, and timers and sensors would be used, where applicable.
- The use of artificial lighting would be restricted to areas where security, basic human safety, and specific cultural resource requirements must be met.
- Artificial lighting would be shielded, where necessary, to prevent the disruption of the night sky, physiological processes of living organisms, and similar natural processes.
- The NPS would take action to prevent or minimize all noise that through frequency, magnitude, or duration adversely affects the natural soundscape.
- The reconstructed or newly constructed facilities (walks, ramps, curb ramps, entrances, elevators, and rest rooms) would conform to the Architectural Barriers Act Accessibility Standards (ABAAS).
- BMPs, such as appropriate mufflers for heavy equipment, appropriate generator sizes for RVs, and noise-muffling construction materials would be used during construction. Construction equipment would be required to have working mufflers.

SOCIOECONOMICS

- Facilities would be designed and constructed to withstand hurricanes, storms, and flooding to reduce the possible adverse socioeconomic effects of structural damage. This would include the use of elevated structures that meet or exceed hurricane building standards.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, FL 33701

SEA TURTLE AND SMALLTOOTH SAWFISH CONSTRUCTION CONDITIONS

The permittee shall comply with the following protected species construction conditions:

- a. The permittee shall instruct all personnel associated with the project of the potential presence of these species and the need to avoid collisions with sea turtles and smalltooth sawfish. All construction personnel are responsible for observing water-related activities for the presence of these species.
- b. The permittee shall advise all construction personnel that there are civil and criminal penalties for harming, harassing, or killing sea turtles or smalltooth sawfish, which are protected under the Endangered Species Act of 1973.
- c. Siltation barriers shall be made of material in which a sea turtle or smalltooth sawfish cannot become entangled, be properly secured, and be regularly monitored to avoid protected species entrapment. Barriers may not block sea turtle or smalltooth sawfish entry to or exit from designated critical habitat without prior agreement from the National Marine Fisheries Service's Protected Resources Division, St. Petersburg, Florida.
- d. All vessels associated with the construction project shall operate at "no wake/idle" speeds at all times while in the construction area and while in water depths where the draft of the vessel provides less than a four-foot clearance from the bottom. All vessels will preferentially follow deep-water routes (e.g., marked channels) whenever possible.
- e. If a sea turtle or smalltooth sawfish is seen within 100 yards of the active daily construction/dredging operation or vessel movement, all appropriate precautions shall be implemented to ensure its protection. These precautions shall include cessation of operation of any moving equipment closer than 50 feet of a sea turtle or smalltooth sawfish. Operation of any mechanical construction equipment shall cease immediately if a sea turtle or smalltooth sawfish is seen within a 50-ft radius of the equipment. Activities may not resume until the protected species has departed the project area of its own volition.
- f. Any collision with and/or injury to a sea turtle or smalltooth sawfish shall be reported immediately to the National Marine Fisheries Service's Protected Resources Division (727-824-5312) and the local authorized sea turtle stranding/rescue organization.
- g. Any special construction conditions, required of your specific project, outside these general conditions, if applicable, will be addressed in the primary consultation.

Revised: March 23, 2006

O:\forms\Sea Turtle and Smalltooth Sawfish Construction Conditions.doc



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Appendix E
FINAL FINANCIAL ANALYSIS (ALTERNATIVE D)
Flamingo Commercial Services Plan
Environmental Assessment



Economics Research Associates

Project Report

**Everglades National Park Commercial
Services Plan- Financial Analysis**

Prepared for

**Everglades National Park
Homestead, FL**

Submitted by

Economics Research Associates

April 4, 2008

ERA Project No. 16763

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General & Limiting Conditions

Every reasonable effort has been made to ensure that the data contained in this study reflect the most accurate and timely information possible. These data are believed to be reliable. This study is based on estimates, assumptions and other information developed by Economics Research Associates from its independent research effort, general knowledge of the market and the industry, and consultations with the client and its representatives. No responsibility is assumed for inaccuracies in reporting by the client, its agent and representatives or any other data source used in preparing or presenting this study.

No warranty or representation is made by Economics Research Associates that any of the projected values or results contained in this study will actually be achieved.

Possession of this study does not carry with it the right of publication thereof or to use the name of "Economics Research Associates" in any manner without first obtaining the prior written consent of Economics Research Associates. No abstracting, excerpting or summarizing of this study may be made without first obtaining the prior written consent of Economics Research Associates. This report is not to be used in conjunction with any public or private offering of securities or other similar purpose where it may be relied upon to any degree by any person, other than the client, without first obtaining the prior written consent of Economics Research Associates. This study may not be used for purposes other than that for which it is prepared or for which prior written consent has first been obtained from Economics Research Associates.

This study is qualified in its entirety by, and should be considered in light of, these limitations, conditions and considerations.



I. Introduction

ERA was retained by the National Park Service as part of a team led by the Louis Berger Group to prepare a Commercial Services Plan (CSP) for the Flamingo concessions area at the Everglades National Park. ERA was tasked with estimating financial feasibility of the proposed CSP at Flamingo. After assessment of the surrounding market conditions, past concession park visitation performance, visitor characteristics, and operations of competitive facilities, three alternatives defined our initial analysis. The process was then opened to the public, and the alternative presented in this document was determined to be the preferred alternative. The assessment of market conditions and past operating performance informed both the development of alternatives and the following projected financial performance of the preferred alternative. The detailed financial analysis of the preferred alternative is presented in the appendix of this document.

The preferred alternative is an updated and more sustainable approach to Flamingo concessions offerings. The components included in this development program enhance the flexibility and operating efficiency of concessions operations by accounting for seasonality and alternative energy uses. The overarching theme of the program is an eco-conscious approach to operations with heightened sensitivity to environmental concerns, and will appeal to a broader audience by providing a larger range of activities and facilities for visitors to enjoy the unique environment of the Everglades. The main components that previously existed at Flamingo will be replaced with special attention to innovative and sustainable design and operational approaches. Additionally, new environmentally cohesive elements including eco-tents and transportation networks like the Flamingo Circulator Shuttle and the Snake Bight Tram will be included in the development to encourage guests to explore the broader reaches of the Flamingo area in more sustainable ways. Significant capital investment will be required to rebuild lodging, food and beverage, and retail components, and all their related support facilities such as concessioner housing, in addition to updating the marina and purchasing equipment necessary to provide rental and tour options for both day and overnight visitors.

Because of the level of investment involved in redeveloping the Flamingo concessions area, it is likely that development will occur in phases. For the purpose of this analysis, implementation was organized in four phases. The first phase will likely be in progress during the interim contract with all investments and elements in place by the start of the contract in 2013 when the new concessioner will take on the investment. These elements include: kayak, canoe, bicycle and skiff rental, camping facilities with electric hook-ups for RVs and restrooms with hot showers, circulator shuttle,



houseboat rental, and limited food and beverage service provided with the snack bar and mini-lounge. The second phase of development will likely be completed during the beginning of the contract and will include the addition of cottages, a gift shop, and the Snake Bight Tram. The third phase of development will follow with the addition of eco-tents with bath houses, and the fourth and final phase will complete the Flamingo concessions area with the lodge, restaurant, and swimming pool. Concessioner housing will be built in two phases to accommodate the limited services program in the first phases of development and then expanded when full operations commence.

II. Operations

Visitation

Visitation estimates under the preferred alternative are based on a capture rate of Florida tourists informed by both past park performance and visitor characteristics. The internationally growing interest in ecologically-based destinations as well as the oncoming retirement of the baby boomer generation enhances the possibility of increased visitation to Everglades National Park. ERA assumed a stabilized 1.5 percent capture of Florida tourists with a slight increase in visitation reflecting the ability to draw a greater eco-traveler and outdoor recreation audience due to enhanced eco-sensitive offerings and activities at the Flamingo concessions area. When the park reopens its concessions operations at Flamingo, ERA expects a one-time, five percent increase in visitation as a result of pent-up demand. With the ability to provide accommodations and activities for visitors, the Flamingo concessions area will see increased use by local tourists and residents.

ERA estimates ten percent of park visitors will stay overnight in the Flamingo concessions area; forty percent of these visitors will utilize traditional lodging facilities, and sixty percent will utilize camping facilities. Average party size will be 2.5 persons and average length of stay will be three nights. The increase in visitation resulting from spurred visitation by the eco-traveler market will allow for greater flexibility in lodging and activities options that will provide a more rustic approach to a visit to Everglades National Park.

Concessioner Financial Performance and Profitability

The following is a summary of projected operating income by department for the 20-year life of the contract for the preferred alternative. All values are quoted in 2008 dollars; the projection has not been adjusted for inflation. Performance is represented in terms of stabilized year of operations. The stabilized year represents operations after all building has reached completion, visitation to the park has stabilized, and operations are running at optimum efficiency.

Lodging

The preferred alternative's lodging options create flexibility that can accommodate both seasonality of demand and different visitor experiences. In addition to a traditional 30 room lodge, 24 cottages, and eight houseboats, the development program includes 40 eco-tents. Eco-tent accommodations will serve as semi-permanent lodging options that will be available to visitors during the peak season. If necessary, they could be dismantled and removed from the environment so as to avoid hurricane damage and limit environmental impact during low season. The availability of seasonal units enables

permanent lodging styles to be smaller thus limiting operating costs, capital investment and environmental impacts. Room counts of each type of accommodation represent the optimum quantity derived from demand and seasonality analysis. These are not binding figures but rather a basis for discussion between the National Park Service and potential investors.

Average daily rates and occupancy vary as different product types have a range of operating seasons and amenity offerings. Traditional lodging units, including cottages and the lodge, which will remain open for the longest duration of the year, will achieve average daily rates between \$100 and \$125 and reach occupancies between 65 and 80 percent. Eco-tents will only be open seasonally and will achieve an average daily rate of \$60 and a high occupancy of 95 percent. Houseboats will be open slightly longer than eco-tents and are expected to achieve an average daily rate near \$300 a night, with occupancy near 85 percent. Lodging is expected to yield \$2,290,000 in total revenue in the stabilized year, generating a net operating income of \$1,515,000.

Camping

The preferred alternative's camping options are slightly downsized from past and current Flamingo operations which are currently managed by the park. This change was made to more closely match supply and visitor demand. Under the preferred alternative there will be 72 walk-in tents, 55 drive-in tents, 3 group tent areas, 2 back country camping chickees, and 40 RVs with electric hook-ups. Restrooms would be upgraded to include solar hot showers. Camping prices range from \$16 to \$25 per night. Visitor demand for tent camping is estimated to be 2.2 percent of total visitation. Visitor demand for RV camping is estimated to be 0.7 percent of total visitation. Camping is expected to yield \$876,000 in total revenue in the stabilized year, generating a net operating income of \$539,000.

Retail

Under the preferred alternative, retail operations include a marina store and gift shop. The marina store will continue to offer supplies and limited grocery items, and the gift shop will offer gift and sundry items. Because of the difference in merchandise mix, the gift shop will achieve expenditures slightly above those of the marina store. ERA expects per capita spending to be \$0.65 at the gift shop and \$0.40 at the marina store. Estimated total revenue in the stabilized year is \$1,678,000 yielding \$182,000 in net operating income.

Food and Beverage

In addition to a traditional full service restaurant and lounge as components to the lodge that previously existed at the Flamingo concessions area, the preferred alternative offers a snack bar and



mini-lounge located near the marina for use by day visitors. In this scenario, once the rebuilding of Flamingo is complete, it is assumed that given the layout of facilities, overnight users will be the largest customer base for the traditional restaurant and lounge, and day visitors will primarily utilize the snack bar and mini-lounge. Visitor demand for the full service restaurant is estimated at three percent of total visitation. Demand for the lounge is estimated to be slightly lower, at 2.6 percent of total visitation, given the more adult nature of the facility. Demand for the snack bar is also estimated at three percent of total visitation. With an average checks of \$20, \$10 and \$8 for the full service restaurant, lounge and snack bar respectively, total revenue is estimated at \$1,758,000, achieving a net operating income of \$242,000.

Tours

Tours and rental offerings will include all traditional options available at the Flamingo concessions area including: fishing charters, kayak/canoe rental, sailing cruise, bicycle rental, and operation of the Snake Bight Tram for visitors wanting to experience the park's wilderness areas. Additionally, options will be expanded to include longer backcountry trips for visitors wanting to experience the parks wilderness areas. Estimated visitor demand for each activity is based on activity preferences and visitor characteristics including paddle friendly activity, household income, and age. However, with planned yellow-bike program offering free cruiser bikes throughout the Flamingo area for overnight visitors, ERA believes that bike rental demand will be less significant than in the past. Estimated visitor participation in tour activities varies between 0.4 and 4.0 percent of total visitors. Total revenue generated by tour and rental activities is estimated to be \$4,603,000 in a stabilized year, achieving net operating income of \$2,693,000.

Marina

Marina facilities will be rebuilt to include 25 slips. Estimated average boat length is 30 feet, and estimated average annual occupancy is 20 percent. At an average daily rate of \$0.55 per foot for a slip without hookups and \$0.75 for a slip with electric hookups, annual slip revenue is estimated at \$18,000 in 2008 dollars in a stabilized year. Annual fuel revenue at \$4.00/gallon with five percent visitor utilization is estimated at \$240,000 yielding total revenue of \$455,500. Additional revenue will be generated through charges for boat transfers, electricity, and other marina services. Estimated net operating income is \$139,000 in a stabilized year.

Consolidated Income

Consolidated net operating income in the first year of operations is expected to be as illustrated in Table 1. Indirect operating expenses are calculated as a percentage of total revenue and include:



general and administrative costs at eight percent, insurance at \$300,000, management fee at three percent, and franchise fee at three percent.

Table 1: Consolidated Net Operating Income, Year One

| | Phase One | Phase Two | Phase Three | Build-Out |
|---|-------------|-------------|-------------|-------------|
| Revenue | \$5,747,180 | \$8,278,670 | \$8,670,478 | \$9,125,677 |
| Gross Profit | \$5,439,245 | \$6,912,268 | \$7,304,076 | \$8,127,258 |
| Total Direct Operating Expenses | \$2,348,938 | \$3,487,631 | \$3,629,268 | \$3,287,268 |
| Total Indirect Operating Expenses | \$1,104,605 | \$1,459,014 | \$1,513,867 | \$1,577,595 |
| Earnings Before Interest, Taxes, Depreciation and Amortization | \$1,985,702 | \$1,965,623 | \$2,160,940 | \$3,262,395 |



III. Investment Potential

In order to estimate financial feasibility, it is important to consider not only net operating income but also the capital investment required to build the facilities. An operation will not be financially feasible if generated income cannot support the required investment. In order to test financial feasibility and appeal to private investors, ERA calculated the internal rate of return for the preferred alternative. Internal Rate of Return (IRR) measures the exact return on investment from the projected investments and future cash flow. The IRR is defined as the discount rate at which the future cash flows exactly equal the initial investment.

In order to estimate financial viability of the preferred alternative, ERA was provided with estimated capital costs totaling \$22,885,000. Additionally, ERA estimates leasehold surrender interest due to the concessioner upon termination of the twenty-year contract to be \$4,022,000. Leasehold surrender interest is the remaining value of the initial concessioner investment at the end of the contract, after depreciation of assets. Leasehold surrender interest was estimated by applying a straight-line depreciation method to all assets associated with the capital investment according to the time periods and regulations stipulated by the Internal Revenue Service. ERA understands that leasehold surrender interest contractually includes inflation adjustments according to local changes in the consumer price index; however, as this analysis is presented in 2008 dollars so as to present an accurate account of revenues, expenses and investment, leasehold surrender interest has not been adjusted for inflation in this instance. Initial capital investment in combination with projected operating cash flows and estimated leasehold surrender interest due to the concessioner upon termination of the project is utilized to estimate the appeal of the project to a private investor.

When the initial investment is measured against future cash flows and leasehold surrender interest, the expected existing capital costs, cash flows and leasehold surrender interest associated with the preferred alternative are estimated to yield an internal rate of return of 15 percent.

As previously mentioned, the preferred alternative is likely to be phased in its development. ERA estimates this phasing will happen between 2013 (at the start of the contract) and 2017. While a complete estimation of the change in visitation by phase is not provided, ERA does present estimated project feasibility at each phase of development according to the required investment and cash flows associated with the elements included in each development phase. For the purposes of estimating the investment potential of each phase, ERA assumes each phase extends for the full 20-year life of the contract. The IRR of each phase is presented in Table 2.

Table 2: Phased Development Internal Rate of Return

| Phase | IRR | Construction Cost | Cash Flows | Leasehold Surrender Interest |
|----------------|-------|-------------------|--------------|------------------------------|
| Phase 1 | 30.2% | (\$7,708,000) | \$25,023,365 | \$1,001,000 |
| Phase 2 | 22.8% | (\$11,386,000) | \$27,837,964 | \$721,600 |
| Phase 3 | 18.3% | (\$16,425,000) | \$31,961,911 | \$1,007,800 |
| Phase 4 | 9.7% | (\$6,460,000) | \$7,029,276 | \$1,292,000 |
| Full Build-Out | 17.6% | (\$22,885,000) | \$42,282,023 | \$4,022,400 |

Private concessions operators will expect a level of return of investment on the project consistent with the risk associated with hospitality operations, the unique environment of the Flamingo Concessions area, and substantial enough to make the project more desirable than other, less risky, types of investment. Given the current state of the economy and the risk associated with this type of operation, the required return on investment for mixed-use hospitality oriented projects of this type from private investors is estimated to be between 15 and 20 percent. ERA estimated the outside funding necessary to achieve these levels of return given the associated capital costs, cash flow, and estimated leasehold surrender interest. To achieve a return of 15 percent, no outside funding will be required. To achieve a return of 18 percent, \$456,000 will be required. Finally, to achieve a return of 20 percent, \$2.7 million in outside funding will be required.

Table 3: IRR Funding Gap

| Scenario | IRR | Funding Gap | Investment | Cash Flows | Leasehold Surrender Interest |
|----------|-----|-------------|---------------|--------------|------------------------------|
| Low | 15% | \$0 | -\$22,885,000 | \$42,282,023 | \$4,022,400 |
| Medium | 18% | \$455,753 | -\$22,429,247 | \$42,282,023 | \$4,022,400 |
| High | 20% | \$2,700,496 | -\$20,184,504 | \$42,282,023 | \$4,022,400 |

Note: Investment is capped at the estimated level of investment for the preferred alternative



IV. Summary

The preferred alternative balances the profit requirements of a private concessioner with the environmental sensitivity of Everglades National Park, and the market desires of its visitors. This alternative blends past offerings at the Flamingo concessions area with new ecologically-based accommodations and amenities that will increase operating efficiency and add greater appeal to park operations. ERA estimates that a private concessioner will be able to achieve a \$3.4 million Earnings Before Interest, Taxes, Depreciation and Amortization (EBITDA) in the stabilized year given the projected visitation and operating parameters. The EBITDA is expected to range between \$3.3 and \$5.6 million over the life of the 20-year contract.

In order to make the redevelopment of the Flamingo concessions operation financially viable, alternate funding sources will be necessary to make the investment appealing to private concessions operators. At the estimated level of investment and future cash flows, the project will yield a return on investment of 17.6 percent. However, because hospitality operations are often risky and highly dependent on uncontrollable factors like weather, national economic performance, fuel prices and traveler whims, a private investor would require a higher return on the investment in the Flamingo concessions area. Given current market conditions and the details of the preferred alternative, ERA estimates a private concessioner will require a return on investment (IRR) between 15 and 20 percent to make the required investment and operate the facilities. The current project fundamentals are expected to yield a rate of return of 17.6 percent. In order to achieve an IRR of 18 to 20 percent, there is a \$456,000 to \$2.7 million funding gap that will need to be addressed through alternative sources of funding.

Despite the funding gap associated with the project, ERA believes the preferred alternative presents an adequate opportunity that could be desirable to private investors should the fundraising effort be successful.

Consolidated Income Statement

| Consolidated Income Statement | Stabilized Year | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|---|---------------------|--------------------|--------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| Revenue | | | | | | | | | | |
| Lodging | \$2,289,992 | \$2,154,139 | \$2,182,512 | \$2,213,501 | \$2,247,209 | \$2,281,430 | \$2,309,365 | \$2,337,719 | \$2,366,498 | \$2,395,709 |
| Camping | \$875,776 | \$649,032 | \$716,431 | \$826,135 | \$841,715 | \$875,776 | \$880,377 | \$899,150 | \$916,641 | \$934,511 |
| Food and Beverage | \$1,757,945 | \$1,302,801 | \$1,438,092 | \$1,658,299 | \$1,689,573 | \$1,757,945 | \$1,767,179 | \$1,804,863 | \$1,839,972 | \$1,875,844 |
| Marina | \$455,487 | \$365,154 | \$391,442 | \$433,325 | \$441,018 | \$455,487 | \$459,204 | \$468,124 | \$476,607 | \$485,261 |
| Tours | \$4,602,618 | \$3,410,969 | \$3,765,185 | \$4,341,729 | \$4,423,610 | \$4,602,618 | \$4,626,797 | \$4,725,460 | \$4,817,381 | \$4,911,300 |
| <u>Retail</u> | <u>\$1,678,038</u> | <u>\$1,243,583</u> | <u>\$1,372,724</u> | <u>\$1,582,922</u> | <u>\$1,612,774</u> | <u>\$1,678,038</u> | <u>\$1,686,853</u> | <u>\$1,722,824</u> | <u>\$1,756,337</u> | <u>\$1,790,578</u> |
| Total Revenue | \$11,659,857 | \$9,125,677 | \$9,866,385 | \$11,055,911 | \$11,255,899 | \$11,651,295 | \$11,729,776 | \$11,958,141 | \$12,173,436 | \$12,393,202 |
| Cost of Goods Sold | | | | | | | | | | |
| Lodging | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Camping | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Food and Beverage | \$527,383 | \$376,628 | \$415,739 | \$479,399 | \$488,440 | \$508,206 | \$510,876 | \$521,770 | \$531,919 | \$542,289 |
| Marina | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Tours | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| <u>Retail</u> | <u>\$839,019</u> | <u>\$621,791</u> | <u>\$686,362</u> | <u>\$791,461</u> | <u>\$806,387</u> | <u>\$839,019</u> | <u>\$843,427</u> | <u>\$861,412</u> | <u>\$878,168</u> | <u>\$895,289</u> |
| Total Cost of Goods Sold | \$1,366,402 | \$998,419 | \$1,102,101 | \$1,270,860 | \$1,294,827 | \$1,347,225 | \$1,354,302 | \$1,383,182 | \$1,410,088 | \$1,437,578 |
| Gross Profit | \$10,293,454 | \$8,127,258 | \$8,764,284 | \$9,785,050 | \$9,961,071 | \$10,304,070 | \$10,375,474 | \$10,574,960 | \$10,763,348 | \$10,955,624 |
| Expenses | | | | | | | | | | |
| Payroll & Benefits | \$2,336,837 | \$1,515,285 | \$1,595,612 | \$1,725,310 | \$1,745,752 | \$1,787,718 | \$1,795,014 | \$1,818,818 | \$1,841,160 | \$1,863,975 |
| Utilities | \$159,777 | \$109,023 | \$116,203 | \$127,840 | \$129,588 | \$133,280 | \$133,870 | \$135,951 | \$137,899 | \$139,889 |
| Supplies | \$89,296 | \$36,310 | \$39,790 | \$45,431 | \$46,276 | \$48,064 | \$48,350 | \$49,359 | \$50,304 | \$51,268 |
| Motor Vehicle Expense | \$13,665 | \$10,955 | \$11,743 | \$13,000 | \$13,231 | \$13,665 | \$13,776 | \$14,044 | \$14,298 | \$14,558 |
| Laundry & Dry Cleaning | \$115,078 | \$81,145 | \$82,729 | \$84,776 | \$86,093 | \$87,590 | \$88,622 | \$89,792 | \$90,967 | \$92,160 |
| China, Glassware, Silver & Linen | \$17,579 | \$2,842 | \$3,138 | \$3,618 | \$3,686 | \$3,836 | \$3,856 | \$3,938 | \$4,014 | \$4,093 |
| Contract Cleaning | \$17,579 | \$2,842 | \$3,138 | \$3,618 | \$3,686 | \$3,836 | \$3,856 | \$3,938 | \$4,014 | \$4,093 |
| Commission | \$57,250 | \$53,853 | \$54,563 | \$55,338 | \$56,180 | \$57,036 | \$57,734 | \$58,443 | \$59,162 | \$59,893 |
| Marketing | \$172,507 | \$127,401 | \$134,597 | \$145,840 | \$148,342 | \$152,593 | \$153,893 | \$156,535 | \$159,069 | \$161,653 |
| Repair and Maintenance | \$682,477 | \$485,951 | \$525,719 | \$589,614 | \$600,294 | \$621,480 | \$625,648 | \$637,875 | \$649,399 | \$661,162 |
| <u>Other Operating Costs</u> | <u>\$1,322,650</u> | <u>\$861,659</u> | <u>\$939,570</u> | <u>\$1,065,483</u> | <u>\$1,085,101</u> | <u>\$1,125,652</u> | <u>\$1,132,568</u> | <u>\$1,155,539</u> | <u>\$1,177,086</u> | <u>\$1,199,089</u> |
| Total Expenses | \$4,984,696 | \$3,287,268 | \$3,506,802 | \$3,859,868 | \$3,918,229 | \$4,034,749 | \$4,057,186 | \$4,124,233 | \$4,187,374 | \$4,251,832 |
| Net Operating Income (Loss) | \$5,308,758 | \$4,839,990 | \$5,257,482 | \$5,925,182 | \$6,042,842 | \$6,269,320 | \$6,318,288 | \$6,450,727 | \$6,575,975 | \$6,703,792 |
| Indirect Operating Expenses | | | | | | | | | | |
| General and Administrative | \$932,789 | \$730,054 | \$789,311 | \$884,473 | \$900,472 | \$932,104 | \$938,382 | \$956,651 | \$973,875 | \$991,456 |
| Insurance | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 |
| Management Fee | \$349,796 | \$273,770 | \$295,992 | \$331,677 | \$337,677 | \$349,539 | \$351,893 | \$358,744 | \$365,203 | \$371,796 |
| <u>Franchise Fee</u> | <u>\$349,796</u> | <u>\$273,770</u> | <u>\$295,992</u> | <u>\$331,677</u> | <u>\$337,677</u> | <u>\$349,539</u> | <u>\$351,893</u> | <u>\$358,744</u> | <u>\$365,203</u> | <u>\$371,796</u> |
| Total Indirect Operating Expenses | \$1,932,380 | \$1,577,595 | \$1,681,294 | \$1,847,828 | \$1,875,826 | \$1,931,181 | \$1,942,169 | \$1,974,140 | \$2,004,281 | \$2,035,048 |
| Earnings Before Interest, Taxes, Depreciation and Amortization | \$3,376,379 | \$3,262,395 | \$3,576,188 | \$4,077,354 | \$4,167,017 | \$4,338,139 | \$4,376,119 | \$4,476,587 | \$4,571,694 | \$4,668,743 |

A-1 Flamingo Commercial Services Plan-Financial Analysis

Consolidated Income Statement, Cont.

| 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 |
|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| \$2,425,358 | \$2,455,452 | \$2,485,997 | \$2,517,000 | \$2,530,091 | \$2,543,366 | \$2,556,826 | \$2,570,475 | \$2,584,316 | \$2,598,350 | \$2,612,583 |
| \$952,772 | \$968,717 | \$984,984 | \$1,001,581 | \$696,890 | \$1,031,966 | \$1,047,612 | \$1,060,620 | \$1,073,885 | \$1,087,416 | \$1,101,221 |
| \$1,912,499 | \$1,944,505 | \$1,977,157 | \$2,010,473 | \$1,398,866 | \$2,071,464 | \$2,102,871 | \$2,128,982 | \$2,155,609 | \$2,182,769 | \$2,210,481 |
| \$494,088 | \$502,103 | \$510,268 | \$518,587 | \$409,681 | \$534,302 | \$542,378 | \$549,526 | \$556,804 | \$564,215 | \$571,763 |
| \$5,007,269 | \$5,091,067 | \$5,176,557 | \$5,263,785 | \$3,662,485 | \$5,423,470 | \$5,505,698 | \$5,574,063 | \$5,643,776 | \$5,714,886 | \$5,787,440 |
| <u>\$1,825,567</u> | <u>\$1,856,118</u> | <u>\$1,887,286</u> | <u>\$1,919,088</u> | <u>\$1,335,281</u> | <u>\$1,977,307</u> | <u>\$2,007,286</u> | <u>\$2,032,210</u> | <u>\$2,057,627</u> | <u>\$2,083,552</u> | <u>\$2,110,004</u> |
| \$12,617,553 | \$12,817,962 | \$13,022,248 | \$13,230,515 | \$10,033,295 | \$13,581,874 | \$13,762,671 | \$13,915,877 | \$14,072,017 | \$14,231,188 | \$14,393,492 |
| n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| \$552,886 | \$562,139 | \$571,578 | \$581,210 | \$404,399 | \$598,841 | \$607,921 | \$615,469 | \$623,167 | \$631,019 | \$639,030 |
| n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| <u>\$912,783</u> | <u>\$928,059</u> | <u>\$943,643</u> | <u>\$959,544</u> | <u>\$667,641</u> | <u>\$988,653</u> | <u>\$1,003,643</u> | <u>\$1,016,105</u> | <u>\$1,028,813</u> | <u>\$1,041,776</u> | <u>\$1,055,002</u> |
| \$1,465,669 | \$1,490,198 | \$1,515,221 | \$1,540,754 | \$1,072,040 | \$1,587,495 | \$1,611,564 | \$1,631,575 | \$1,651,980 | \$1,672,795 | \$1,694,032 |
| \$11,151,883 | \$11,327,764 | \$11,507,027 | \$11,689,761 | \$8,961,255 | \$11,994,379 | \$12,151,107 | \$12,284,302 | \$12,420,036 | \$12,558,393 | \$12,699,460 |
| \$1,887,273 | \$1,907,380 | \$1,927,856 | \$1,948,711 | \$1,656,475 | \$1,985,603 | \$2,004,552 | \$2,020,981 | \$2,037,702 | \$2,054,725 | \$2,072,058 |
| \$141,921 | \$143,527 | \$145,162 | \$146,827 | \$123,896 | \$149,861 | \$151,419 | \$152,778 | \$154,162 | \$155,570 | \$157,002 |
| \$52,254 | \$52,938 | \$53,632 | \$54,337 | \$47,894 | \$55,697 | \$56,392 | \$57,032 | \$57,682 | \$58,342 | \$59,011 |
| \$14,823 | \$15,063 | \$15,308 | \$15,558 | \$12,290 | \$16,029 | \$16,271 | \$16,486 | \$16,704 | \$16,926 | \$17,153 |
| \$93,372 | \$94,580 | \$95,806 | \$97,052 | \$94,996 | \$98,554 | \$99,322 | \$100,076 | \$100,841 | \$101,618 | \$102,406 |
| \$4,173 | \$4,243 | \$4,314 | \$4,386 | \$3,052 | \$4,520 | \$4,588 | \$4,645 | \$4,703 | \$4,762 | \$4,823 |
| \$4,173 | \$4,243 | \$4,314 | \$4,386 | \$3,052 | \$4,520 | \$4,588 | \$4,645 | \$4,703 | \$4,762 | \$4,823 |
| \$60,634 | \$61,386 | \$62,150 | \$62,925 | \$63,252 | \$63,584 | \$63,921 | \$64,262 | \$64,608 | \$64,959 | \$65,315 |
| \$164,287 | \$166,595 | \$168,943 | \$171,331 | \$149,217 | \$174,836 | \$176,634 | \$178,244 | \$179,881 | \$181,546 | \$183,240 |
| \$673,171 | \$683,768 | \$694,569 | \$705,579 | \$539,692 | \$724,290 | \$733,916 | \$742,110 | \$750,459 | \$758,969 | \$767,644 |
| <u>\$1,221,560</u> | <u>\$1,238,980</u> | <u>\$1,256,705</u> | <u>\$1,274,742</u> | <u>\$1,051,662</u> | <u>\$1,307,060</u> | <u>\$1,323,637</u> | <u>\$1,338,295</u> | <u>\$1,353,199</u> | <u>\$1,368,356</u> | <u>\$1,383,774</u> |
| \$4,317,640 | \$4,372,702 | \$4,428,759 | \$4,485,835 | \$3,745,479 | \$4,584,553 | \$4,635,239 | \$4,679,554 | \$4,724,645 | \$4,770,535 | \$4,817,249 |
| \$6,834,243 | \$6,955,061 | \$7,078,268 | \$7,203,926 | \$5,215,776 | \$7,409,827 | \$7,515,868 | \$7,604,748 | \$7,695,391 | \$7,787,858 | \$7,882,211 |
| \$1,009,404 | \$1,025,437 | \$1,041,780 | \$1,058,441 | \$802,664 | \$1,086,550 | \$1,101,014 | \$1,113,270 | \$1,125,761 | \$1,138,495 | \$1,151,479 |
| \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 | \$300,000 |
| \$378,527 | \$384,539 | \$390,667 | \$396,915 | \$300,999 | \$407,456 | \$412,880 | \$417,476 | \$422,161 | \$426,936 | \$431,805 |
| <u>\$378,527</u> | <u>\$384,539</u> | <u>\$390,667</u> | <u>\$396,915</u> | <u>\$300,999</u> | <u>\$407,456</u> | <u>\$412,880</u> | <u>\$417,476</u> | <u>\$422,161</u> | <u>\$426,936</u> | <u>\$431,805</u> |
| \$2,066,457 | \$2,094,515 | \$2,123,115 | \$2,152,272 | \$1,704,661 | \$2,201,462 | \$2,226,774 | \$2,248,223 | \$2,270,082 | \$2,292,366 | \$2,315,089 |
| <u>\$4,767,785</u> | <u>\$4,860,547</u> | <u>\$4,955,153</u> | <u>\$5,051,654</u> | <u>\$3,511,114</u> | <u>\$5,208,364</u> | <u>\$5,289,094</u> | <u>\$5,356,525</u> | <u>\$5,425,309</u> | <u>\$5,495,492</u> | <u>\$5,567,122</u> |

A-2 Fleming Commercial Services Plan-Financial Analysis

Lodging Income Statement

| Preferred Alternative | Lodge | Cottages | Eco-tents | Houseboats | Total Lodging |
|-----------------------------|------------------|------------------|------------------|------------------|--------------------|
| Revenue | | | | | |
| # Rooms | 30 | 24 | 40 | 8 | |
| Days of Operation | 242 | 365 | 182 | 212 | |
| Occupancy | 80.0% | 65.0% | 95.0% | 85.0% | |
| ADR | \$120 | \$125 | \$60 | \$300 | |
| Rooms Department | \$696,960 | \$711,750 | \$414,960 | \$432,480 | \$2,256,150 |
| Other Operated Departments | \$10,454 | \$10,676 | \$6,224 | \$6,487 | \$33,842 |
| Total Revenue | \$707,414 | \$722,426 | \$421,184 | \$438,967 | \$2,289,992 |
| Expenses | 16.3% | | | | |
| Payroll & Benefits | \$115,656 | \$79,858 | \$67,664 | \$38,832 | \$302,010 |
| Laundry, Linen & Supplies | \$29,040 | \$34,164 | \$13,832 | \$2,883 | \$79,919 |
| Commission | \$17,685 | \$18,061 | \$10,530 | \$10,974 | \$57,250 |
| Marketing | \$21,222 | \$21,673 | \$12,636 | \$13,169 | \$68,700 |
| Utilities | \$25,452 | \$9,824 | \$1,746 | \$1,442 | \$38,463 |
| Repairs and Maintenance | \$35,371 | \$36,121 | \$21,059 | \$21,948 | \$114,500 |
| Other | \$35,371 | \$36,121 | \$21,059 | \$21,948 | \$114,500 |
| Total Expenses | \$279,797 | \$235,822 | \$148,525 | \$111,197 | \$775,341 |
| Net Operating Income | \$427,617 | \$486,605 | \$272,659 | \$327,770 | \$1,514,651 |

| Lodging 20-year Cash Flow | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|-----------------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| Revenue | | | | | | | | | |
| Lodge | \$658,073 | \$666,741 | \$676,208 | \$686,506 | \$696,960 | \$707,414 | \$718,026 | \$728,796 | \$739,728 |
| Cottages | \$672,038 | \$680,890 | \$690,558 | \$701,074 | \$711,750 | \$722,426 | \$733,263 | \$744,262 | \$755,426 |
| Eco-tents | \$391,808 | \$396,968 | \$402,605 | \$408,736 | \$414,960 | \$414,960 | \$414,960 | \$414,960 | \$414,960 |
| Houseboats | \$408,350 | \$413,728 | \$419,603 | \$425,993 | \$432,480 | \$438,967 | \$445,552 | \$452,235 | \$459,019 |
| Other Operated Departments | \$23,870 | \$24,184 | \$24,528 | \$24,901 | \$25,280 | \$25,597 | \$25,919 | \$26,245 | \$26,577 |
| Total Revenue | \$2,154,139 | \$2,182,512 | \$2,213,501 | \$2,247,209 | \$2,281,430 | \$2,309,365 | \$2,337,719 | \$2,366,498 | \$2,395,709 |
| Expenses | | | | | | | | | |
| Payroll | \$294,366 | \$296,069 | \$297,931 | \$299,955 | \$302,010 | \$303,650 | \$305,315 | \$307,005 | \$308,720 |
| Laundry, Linen & Supplies | \$75,460 | \$76,454 | \$77,540 | \$78,720 | \$79,919 | \$80,911 | \$81,917 | \$82,938 | \$83,975 |
| Commission | \$53,853 | \$54,563 | \$55,338 | \$56,180 | \$57,036 | \$57,734 | \$58,443 | \$59,162 | \$59,893 |
| Marketing | \$64,624 | \$65,475 | \$66,405 | \$67,416 | \$68,443 | \$69,281 | \$70,132 | \$70,995 | \$71,871 |
| Utilities | \$38,203 | \$38,261 | \$38,324 | \$38,393 | \$38,463 | \$38,528 | \$38,593 | \$38,660 | \$38,728 |
| Repairs and Maintenance | \$107,707 | \$109,126 | \$110,675 | \$112,360 | \$114,072 | \$115,468 | \$116,886 | \$118,325 | \$119,785 |
| Other | \$107,707 | \$109,126 | \$110,675 | \$112,360 | \$114,072 | \$115,468 | \$116,886 | \$118,325 | \$119,785 |
| Total Expenses | \$741,920 | \$749,074 | \$756,887 | \$765,386 | \$774,014 | \$781,040 | \$788,171 | \$795,410 | \$802,757 |
| Net Operating Income | \$1,412,219 | \$1,433,438 | \$1,456,614 | \$1,481,823 | \$1,507,416 | \$1,528,325 | \$1,549,547 | \$1,571,088 | \$1,592,952 |

A-3 Flamingo Commercial Services Plan-Financial Analysis

Lodging Income Statement, Cont.

| 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 |
|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| \$750,824 | \$762,086 | \$773,518 | \$785,120 | \$785,991 | \$786,863 | \$787,734 | \$788,605 | \$789,476 | \$790,347 | \$791,219 |
| \$766,757 | \$778,258 | \$789,932 | \$801,781 | \$813,808 | \$826,015 | \$838,405 | \$850,981 | \$863,746 | \$876,702 | \$889,853 |
| \$414,960 | \$414,960 | \$414,960 | \$414,960 | \$414,960 | \$414,960 | \$414,960 | \$414,960 | \$414,960 | \$414,960 | \$414,960 |
| \$465,904 | \$472,892 | \$479,986 | \$487,186 | \$487,186 | \$487,186 | \$487,186 | \$487,186 | \$487,186 | \$487,186 | \$487,186 |
| <u>\$26,913</u> | <u>\$27,255</u> | <u>\$27,601</u> | <u>\$27,953</u> | <u>\$28,147</u> | <u>\$28,343</u> | <u>\$28,542</u> | <u>\$28,743</u> | <u>\$28,948</u> | <u>\$29,155</u> | <u>\$29,366</u> |
| \$2,425,358 | \$2,455,452 | \$2,485,997 | \$2,517,000 | \$2,530,091 | \$2,543,366 | \$2,556,826 | \$2,570,475 | \$2,584,316 | \$2,598,350 | \$2,612,583 |
| \$310,461 | \$312,228 | \$314,021 | \$315,841 | \$316,566 | \$317,300 | \$318,045 | \$318,800 | \$319,566 | \$320,342 | \$321,129 |
| \$85,027 | \$86,095 | \$87,179 | \$88,279 | \$88,892 | \$89,515 | \$90,146 | \$90,786 | \$91,435 | \$92,093 | \$92,760 |
| \$60,634 | \$61,386 | \$62,150 | \$62,925 | \$63,252 | \$63,584 | \$63,921 | \$64,262 | \$64,608 | \$64,959 | \$65,315 |
| \$72,761 | \$73,664 | \$74,580 | \$75,510 | \$75,903 | \$76,301 | \$76,705 | \$77,114 | \$77,529 | \$77,951 | \$78,377 |
| \$38,797 | \$38,866 | \$38,937 | \$39,009 | \$39,035 | \$39,061 | \$39,088 | \$39,115 | \$39,142 | \$39,170 | \$39,198 |
| \$121,268 | \$122,773 | \$124,300 | \$125,850 | \$126,505 | \$127,168 | \$127,841 | \$128,524 | \$129,216 | \$129,918 | \$130,629 |
| <u>\$121,268</u> | <u>\$122,773</u> | <u>\$124,300</u> | <u>\$125,850</u> | <u>\$126,505</u> | <u>\$127,168</u> | <u>\$127,841</u> | <u>\$128,524</u> | <u>\$129,216</u> | <u>\$129,918</u> | <u>\$130,629</u> |
| \$810,214 | \$817,784 | \$825,466 | \$833,264 | \$836,657 | \$840,098 | \$843,586 | \$847,124 | \$850,711 | \$854,349 | \$858,038 |
| <u>\$1,615,143</u> | <u>\$1,637,668</u> | <u>\$1,660,530</u> | <u>\$1,683,736</u> | <u>\$1,693,434</u> | <u>\$1,703,268</u> | <u>\$1,713,240</u> | <u>\$1,723,351</u> | <u>\$1,733,605</u> | <u>\$1,744,002</u> | <u>\$1,754,545</u> |

A-4 Flamingo Commercial Services Plan-Financial Analysis

Camping Income Statement

| Preferred Alternative | Walk-in Tent | Drive-in Tent | Group Tent | Back Country | RV w/ Hook-Up | Total Camping |
|-------------------------|--------------|---------------|------------|--------------|---------------|---------------|
| # Rooms | 72 | 55 | 3 | 2 | 40 | |
| % Visitor Demand | 1.1% | 1.0% | 0.1% | 0.0% | 0.7% | |
| # Visits | 17,579 | 15,981 | 799 | 559 | 11,187 | |
| Occupancy | 66.9% | 79.6% | 73.0% | 76.6% | 76.6% | |
| ADB | \$16 | \$18 | \$20 | \$20 | \$25 | |
| Total Revenue | \$281,271 | \$287,664 | \$15,981 | \$11,187 | \$279,673 | \$875,776 |
| Expenses | | | | | | |
| Payroll & Benefits | \$52,659 | \$49,463 | \$10,799 | \$10,559 | \$57,374 | \$180,854 |
| Marketing | \$2,813 | \$2,877 | \$160 | \$112 | \$2,797 | \$8,758 |
| Utilities | \$2,813 | \$4,315 | \$80 | \$0 | \$8,390 | \$15,598 |
| Repairs and Maintenance | \$14,064 | \$14,383 | \$799 | \$559 | \$13,984 | \$43,789 |
| Other | \$28,127 | \$28,766 | \$1,598 | \$1,119 | \$27,967 | \$87,578 |
| Total Expenses | \$100,475 | \$99,804 | \$13,436 | \$12,349 | \$110,512 | \$336,576 |
| Net Operating Income | \$180,796 | \$187,860 | \$2,545 | -\$1,162 | \$169,161 | \$539,200 |

| Camping 20-year Cash Flow | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|---------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Revenue | | | | | | | | | |
| Walk-in Tent | \$208,448 | \$230,095 | \$265,328 | \$270,332 | \$281,271 | \$282,749 | \$288,778 | \$294,396 | \$300,135 |
| Drive-in Tent | \$213,186 | \$235,324 | \$271,358 | \$276,476 | \$287,664 | \$289,175 | \$295,341 | \$301,086 | \$306,956 |
| Group Tent | \$11,844 | \$13,074 | \$15,075 | \$15,360 | \$15,981 | \$16,065 | \$16,408 | \$16,727 | \$17,053 |
| Back Country Tent | \$8,291 | \$9,151 | \$10,553 | \$10,752 | \$11,187 | \$11,246 | \$11,485 | \$11,709 | \$11,937 |
| RV w/ Hook-Up | \$207,264 | \$228,787 | \$263,820 | \$268,796 | \$279,673 | \$281,142 | \$287,137 | \$292,723 | \$298,430 |
| Total Revenue | \$649,032 | \$716,431 | \$826,135 | \$841,715 | \$875,776 | \$880,377 | \$899,150 | \$916,641 | \$934,511 |
| Expenses | | | | | | | | | |
| Payroll & Benefits | \$158,338 | \$165,434 | \$176,985 | \$178,626 | \$182,212 | \$182,697 | \$184,673 | \$186,515 | \$188,397 |
| Marketing | \$6,490 | \$7,164 | \$8,261 | \$8,417 | \$8,758 | \$8,804 | \$8,992 | \$9,166 | \$9,345 |
| Utilities | \$6,490 | \$7,164 | \$8,261 | \$8,417 | \$8,758 | \$8,804 | \$8,992 | \$9,166 | \$9,345 |
| Repairs and Maintenance | \$32,452 | \$35,822 | \$41,307 | \$42,086 | \$43,789 | \$44,019 | \$44,958 | \$45,832 | \$46,726 |
| Other | \$64,903 | \$71,643 | \$82,613 | \$84,171 | \$87,578 | \$88,038 | \$89,915 | \$91,664 | \$93,451 |
| Total Expenses | \$268,673 | \$287,228 | \$317,428 | \$321,717 | \$331,094 | \$332,361 | \$337,529 | \$342,344 | \$347,263 |
| Net Operating Income | \$380,358 | \$429,203 | \$508,706 | \$519,997 | \$544,682 | \$548,016 | \$561,621 | \$574,297 | \$587,248 |

A-5 Flamingo Commercial Services Plan-Financial Analysis

Camping Income Statement, Cont.

| 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 |
|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| \$306,000 | \$311,121 | \$316,345 | \$321,676 | \$223,819 | \$331,434 | \$336,459 | \$340,637 | \$344,897 | \$349,243 | \$353,677 |
| \$312,954 | \$318,192 | \$323,535 | \$328,987 | \$228,905 | \$338,967 | \$344,106 | \$348,379 | \$352,736 | \$357,180 | \$361,715 |
| \$17,386 | \$17,677 | \$17,974 | \$18,277 | \$12,717 | \$18,831 | \$19,117 | \$19,354 | \$19,596 | \$19,843 | \$20,095 |
| \$12,170 | \$12,374 | \$12,582 | \$12,794 | \$8,902 | \$13,182 | \$13,382 | \$13,548 | \$13,718 | \$13,890 | \$14,067 |
| <u>\$304,261</u> | <u>\$309,353</u> | <u>\$314,548</u> | <u>\$319,848</u> | <u>\$222,547</u> | <u>\$329,551</u> | <u>\$334,548</u> | <u>\$338,702</u> | <u>\$342,938</u> | <u>\$347,259</u> | <u>\$351,667</u> |
| \$952,772 | \$968,717 | \$984,984 | \$1,001,581 | \$696,890 | \$1,031,966 | \$1,047,612 | \$1,060,620 | \$1,073,885 | \$1,087,416 | \$1,101,221 |
| | | | | | | | | | | |
| \$190,319 | \$191,998 | \$193,711 | \$195,458 | \$163,377 | \$198,658 | \$200,305 | \$201,675 | \$203,071 | \$204,496 | \$205,950 |
| \$9,528 | \$9,687 | \$9,850 | \$10,016 | \$6,969 | \$10,320 | \$10,476 | \$10,606 | \$10,739 | \$10,874 | \$11,012 |
| \$9,528 | \$9,687 | \$9,850 | \$10,016 | \$6,969 | \$10,320 | \$10,476 | \$10,606 | \$10,739 | \$10,874 | \$11,012 |
| \$47,639 | \$48,436 | \$49,249 | \$50,079 | \$34,844 | \$51,598 | \$52,381 | \$53,031 | \$53,694 | \$54,371 | \$55,061 |
| \$95,277 | \$96,872 | \$98,498 | \$100,158 | \$69,689 | \$103,197 | \$104,761 | \$106,062 | \$107,389 | \$108,742 | \$110,122 |
| \$352,290 | \$356,680 | \$361,158 | \$365,727 | \$281,848 | \$374,092 | \$378,399 | \$381,980 | \$385,632 | \$389,357 | \$393,157 |
| <u>\$600,482</u> | <u>\$612,037</u> | <u>\$623,826</u> | <u>\$635,854</u> | <u>\$415,041</u> | <u>\$657,874</u> | <u>\$669,213</u> | <u>\$678,640</u> | <u>\$688,253</u> | <u>\$698,059</u> | <u>\$708,064</u> |

A-6 Flamingo Commercial Services Plan-Financial Analysis

Food and Beverage Income Statement

| Preferred Alternative | Restaurant | Lounge | Snack Bar | Total F&B |
|----------------------------------|------------|-----------|-----------|-------------|
| % Visitor Demand | 3.0% | 2.6% | 3.0% | |
| Visitors | 47,944 | 41,551 | 47,944 | |
| Spending per Visitor | \$20.00 | \$10.00 | \$8.00 | |
| Total Revenue | \$958,879 | \$415,514 | \$383,552 | \$1,757,945 |
| Total Cost of Sales | \$287,664 | \$124,654 | \$115,065 | \$527,383 |
| Gross Profit | \$671,215 | \$290,860 | \$268,486 | \$1,230,561 |
| Expenses | | | | |
| Payroll & Benefits | \$251,776 | \$122,327 | \$87,533 | \$461,636 |
| Laundry & Dry Cleaning | \$19,178 | \$8,310 | \$7,671 | \$35,159 |
| China, Glassware, Silver & Linen | \$9,589 | \$4,155 | \$3,836 | \$17,579 |
| Contract Cleaning | \$9,589 | \$4,155 | \$3,836 | \$17,579 |
| Supplies | \$28,766 | \$12,465 | \$11,507 | \$52,738 |
| Marketing | \$14,383 | \$6,233 | \$5,753 | \$26,369 |
| Utilities | \$14,383 | \$6,233 | \$5,753 | \$26,369 |
| Repairs and Maintenance | \$47,944 | \$20,776 | \$19,178 | \$87,897 |
| Other | \$143,832 | \$62,327 | \$57,533 | \$263,692 |
| Total Expenses | \$539,439 | \$246,981 | \$202,598 | \$989,019 |
| Net Operating Income | \$131,776 | \$43,879 | \$65,888 | \$241,542 |

| Food & Beverage 20-year Cash Flow | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|-----------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Revenue | | | | | | | | | |
| Restaurant | \$710,619 | \$784,414 | \$904,527 | \$921,585 | \$958,879 | \$963,916 | \$984,471 | \$1,003,621 | \$1,023,187 |
| Lounge | \$307,935 | \$339,913 | \$391,962 | \$399,354 | \$415,514 | \$417,697 | \$426,604 | \$434,902 | \$443,381 |
| Snack Bar | \$284,247 | \$313,765 | \$361,811 | \$368,634 | \$383,552 | \$385,566 | \$393,788 | \$401,448 | \$409,275 |
| Total Revenue | \$1,302,801 | \$1,438,092 | \$1,658,299 | \$1,689,573 | \$1,757,945 | \$1,767,179 | \$1,804,863 | \$1,839,972 | \$1,875,844 |
| Cost of Goods Sold | \$376,628 | \$415,739 | \$479,399 | \$488,440 | \$508,206 | \$510,876 | \$521,770 | \$531,919 | \$542,289 |
| Gross Operating Profit | \$926,173 | \$1,022,352 | \$1,178,900 | \$1,201,133 | \$1,249,739 | \$1,256,304 | \$1,283,094 | \$1,308,053 | \$1,333,554 |
| Expenses | | | | | | | | | |
| Labor | \$380,951 | \$404,934 | \$443,971 | \$449,515 | \$461,636 | \$463,273 | \$469,953 | \$476,177 | \$482,536 |
| Laundry & Dry Cleaning | \$26,056 | \$28,762 | \$33,166 | \$33,791 | \$35,159 | \$35,344 | \$36,097 | \$36,799 | \$37,517 |
| China, Glassware, Silver & Linen | \$13,028 | \$14,381 | \$16,583 | \$16,896 | \$17,579 | \$17,672 | \$18,049 | \$18,400 | \$18,758 |
| Contract Cleaning | \$13,028 | \$14,381 | \$16,583 | \$16,896 | \$17,579 | \$17,672 | \$18,049 | \$18,400 | \$18,758 |
| Supplies | \$39,084 | \$43,143 | \$49,749 | \$50,687 | \$52,738 | \$53,015 | \$54,146 | \$55,199 | \$56,275 |
| Marketing | \$19,542 | \$21,571 | \$24,874 | \$25,344 | \$26,369 | \$26,508 | \$27,073 | \$27,600 | \$28,138 |
| Utilities | \$19,542 | \$21,571 | \$24,874 | \$25,344 | \$26,369 | \$26,508 | \$27,073 | \$27,600 | \$28,138 |
| Repairs and Maintenance | \$65,140 | \$71,905 | \$82,915 | \$84,479 | \$87,897 | \$88,359 | \$90,243 | \$91,999 | \$93,792 |
| Other | \$195,420 | \$215,714 | \$248,745 | \$253,436 | \$263,692 | \$265,077 | \$270,729 | \$275,996 | \$281,377 |
| Total Expenses | \$771,791 | \$836,362 | \$941,461 | \$956,387 | \$989,019 | \$993,427 | \$1,011,412 | \$1,028,168 | \$1,045,289 |
| Net Operating Income | \$154,382 | \$185,990 | \$237,439 | \$244,746 | \$260,720 | \$262,877 | \$271,682 | \$279,884 | \$288,265 |

A-7 Flamingo Commercial Services Plan-Financial Analysis

Food and Beverage Income Statement, Cont.

| 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 |
|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| \$1,043,181 | \$1,060,639 | \$1,078,449 | \$1,096,622 | \$763,018 | \$1,129,890 | \$1,147,020 | \$1,161,263 | \$1,175,787 | \$1,190,601 | \$1,205,717 |
| \$452,045 | \$459,610 | \$467,328 | \$475,203 | \$330,641 | \$489,619 | \$497,042 | \$503,214 | \$509,508 | \$515,927 | \$522,477 |
| \$417,272 | \$424,256 | \$431,380 | \$438,649 | \$305,202 | \$451,956 | \$458,808 | \$464,505 | \$470,315 | \$476,240 | \$482,282 |
| \$1,912,499 | \$1,944,505 | \$1,977,157 | \$2,010,473 | \$1,398,866 | \$2,071,464 | \$2,102,871 | \$2,128,982 | \$2,155,609 | \$2,182,769 | \$2,210,481 |
| \$552,886 | \$562,139 | \$571,578 | \$581,210 | \$404,399 | \$598,841 | \$607,921 | \$615,469 | \$623,167 | \$631,019 | \$639,030 |
| \$1,359,613 | \$1,382,366 | \$1,405,579 | \$1,429,264 | \$994,466 | \$1,472,623 | \$1,494,950 | \$1,513,513 | \$1,532,442 | \$1,551,750 | \$1,571,451 |
| \$489,034 | \$494,708 | \$500,496 | \$506,402 | \$397,981 | \$517,214 | \$522,782 | \$527,411 | \$532,131 | \$536,945 | \$541,858 |
| \$38,250 | \$38,890 | \$39,543 | \$40,209 | \$27,977 | \$41,429 | \$42,057 | \$42,580 | \$43,112 | \$43,655 | \$44,210 |
| \$19,125 | \$19,445 | \$19,772 | \$20,105 | \$13,989 | \$20,715 | \$21,029 | \$21,290 | \$21,556 | \$21,828 | \$22,105 |
| \$19,125 | \$19,445 | \$19,772 | \$20,105 | \$13,989 | \$20,715 | \$21,029 | \$21,290 | \$21,556 | \$21,828 | \$22,105 |
| \$57,375 | \$58,335 | \$59,315 | \$60,314 | \$41,966 | \$62,144 | \$63,086 | \$63,869 | \$64,668 | \$65,483 | \$66,314 |
| \$28,687 | \$29,168 | \$29,657 | \$30,157 | \$20,983 | \$31,072 | \$31,543 | \$31,935 | \$32,334 | \$32,742 | \$33,157 |
| \$28,687 | \$29,168 | \$29,657 | \$30,157 | \$20,983 | \$31,072 | \$31,543 | \$31,935 | \$32,334 | \$32,742 | \$33,157 |
| \$95,625 | \$97,225 | \$98,858 | \$100,524 | \$69,943 | \$103,573 | \$105,144 | \$106,449 | \$107,780 | \$109,138 | \$110,524 |
| \$286,875 | \$291,676 | \$296,574 | \$301,571 | \$209,830 | \$310,720 | \$315,431 | \$319,347 | \$323,341 | \$327,415 | \$331,572 |
| \$1,062,783 | \$1,078,059 | \$1,093,643 | \$1,109,544 | \$817,641 | \$1,138,653 | \$1,153,643 | \$1,166,105 | \$1,178,813 | \$1,191,776 | \$1,205,002 |
| \$296,829 | \$304,307 | \$311,936 | \$319,720 | \$176,826 | \$333,969 | \$341,307 | \$347,408 | \$353,629 | \$359,974 | \$366,449 |

A-8 Flamingo Commercial Services Plan-Financial Analysis

Marina Income Statement

| Marina | Preferred Alternative |
|-----------------------------|-----------------------|
| Revenue | |
| # Slips | 25 |
| Average boat size | 30 |
| Occupancy | 20.0% |
| Rate with hook-up | \$0.75 |
| Rate without hook-up | \$0.55 |
| Rented Feet | 54,750 |
| Average rate | \$0.67 |
| Slip Rental | \$36,683 |
| Fuel | \$319,626 |
| Other | \$99,179 |
| Total Revenue | \$455,487 |
| Expenses | |
| Payroll & Benefits | \$168,323 |
| Supplies | \$11,387 |
| Motor Vehicle Expense | \$13,665 |
| Utilities | \$9,110 |
| Marketing | \$6,832 |
| Repairs and Maintenance | \$36,439 |
| Other | \$70,601 |
| Total Expenses | \$316,357 |
| Net Operating Income | \$139,131 |

| Marina 20-year Cash Flow | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|-----------------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| Revenue | | | | | | | | | |
| Slip Rental | \$34,636 | \$35,092 | \$35,590 | \$36,132 | \$36,683 | \$37,233 | \$37,791 | \$38,358 | \$38,933 |
| Fuel | \$236,873 | \$261,471 | \$301,509 | \$307,195 | \$319,626 | \$321,305 | \$328,157 | \$334,540 | \$341,062 |
| Other | \$93,645 | \$94,878 | \$96,226 | \$97,691 | \$99,179 | \$100,666 | \$102,176 | \$103,709 | \$105,265 |
| Total Revenue | \$365,154 | \$391,442 | \$433,325 | \$441,018 | \$455,487 | \$459,204 | \$468,124 | \$476,607 | \$485,261 |
| Expenses | | | | | | | | | |
| Labor | \$154,773 | \$158,716 | \$164,999 | \$166,153 | \$168,323 | \$168,881 | \$170,219 | \$171,491 | \$172,789 |
| Supplies | \$9,129 | \$9,786 | \$10,833 | \$11,025 | \$11,387 | \$11,480 | \$11,703 | \$11,915 | \$12,132 |
| Motor Vehicle Expense | \$10,955 | \$11,743 | \$13,000 | \$13,231 | \$13,665 | \$13,776 | \$14,044 | \$14,298 | \$14,558 |
| Utilities | \$7,303 | \$7,829 | \$8,666 | \$8,820 | \$9,110 | \$9,184 | \$9,362 | \$9,532 | \$9,705 |
| Marketing | \$5,477 | \$5,872 | \$6,500 | \$6,615 | \$6,832 | \$6,888 | \$7,022 | \$7,149 | \$7,279 |
| Repairs and Maintenance | \$29,212 | \$31,315 | \$34,666 | \$35,281 | \$36,439 | \$36,736 | \$37,450 | \$38,129 | \$38,821 |
| Other | \$56,599 | \$60,673 | \$67,165 | \$68,358 | \$70,601 | \$71,177 | \$72,559 | \$73,874 | \$75,215 |
| Total Expenses | \$273,448 | \$285,935 | \$305,829 | \$309,484 | \$316,357 | \$318,122 | \$322,359 | \$326,389 | \$330,499 |
| Net Operating Income | \$91,706 | \$105,507 | \$127,496 | \$131,535 | \$139,131 | \$141,082 | \$145,765 | \$150,219 | \$154,762 |

A-9 Flamingo Commercial Services Plan-Financial Analysis

Marina Income Statement, Cont.

| 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 |
|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| \$39,517 | \$40,110 | \$40,712 | \$41,323 | \$41,942 | \$42,572 | \$43,210 | \$43,858 | \$44,516 | \$45,184 | \$45,862 |
| \$347,727 | \$353,546 | \$359,483 | \$365,541 | \$254,339 | \$376,630 | \$382,340 | \$387,088 | \$391,929 | \$396,867 | \$401,906 |
| <u>\$106,844</u> | <u>\$108,446</u> | <u>\$110,073</u> | <u>\$111,724</u> | <u>\$113,400</u> | <u>\$115,101</u> | <u>\$116,827</u> | <u>\$118,580</u> | <u>\$120,358</u> | <u>\$122,164</u> | <u>\$123,996</u> |
| \$494,088 | \$502,103 | \$510,268 | \$518,587 | \$409,681 | \$534,302 | \$542,378 | \$549,526 | \$556,804 | \$564,215 | \$571,763 |
| | | | | | | | | | | |
| \$174,113 | \$175,315 | \$176,540 | \$177,788 | \$161,452 | \$180,145 | \$181,357 | \$182,429 | \$183,521 | \$184,632 | \$185,765 |
| \$12,352 | \$12,553 | \$12,757 | \$12,965 | \$10,242 | \$13,358 | \$13,559 | \$13,738 | \$13,920 | \$14,105 | \$14,294 |
| \$14,823 | \$15,063 | \$15,308 | \$15,558 | \$12,290 | \$16,029 | \$16,271 | \$16,486 | \$16,704 | \$16,926 | \$17,153 |
| \$9,882 | \$10,042 | \$10,205 | \$10,372 | \$8,194 | \$10,686 | \$10,848 | \$10,991 | \$11,136 | \$11,284 | \$11,435 |
| \$7,411 | \$7,532 | \$7,654 | \$7,779 | \$6,145 | \$8,015 | \$8,136 | \$8,243 | \$8,352 | \$8,463 | \$8,576 |
| \$39,527 | \$40,168 | \$40,821 | \$41,487 | \$32,775 | \$42,744 | \$43,390 | \$43,962 | \$44,544 | \$45,137 | \$45,741 |
| \$76,584 | \$77,826 | \$79,092 | \$80,381 | \$63,501 | \$82,817 | \$84,069 | \$85,176 | \$86,305 | \$87,453 | \$88,623 |
| \$334,692 | \$338,499 | \$342,377 | \$346,329 | \$294,599 | \$353,794 | \$357,629 | \$361,025 | \$364,482 | \$368,002 | \$371,588 |
| | | | | | | | | | | |
| <u>\$159,396</u> | <u>\$163,604</u> | <u>\$167,891</u> | <u>\$172,258</u> | <u>\$115,083</u> | <u>\$180,509</u> | <u>\$184,748</u> | <u>\$188,501</u> | <u>\$192,322</u> | <u>\$196,213</u> | <u>\$200,176</u> |

A-10 Flamingo Commercial Services Plan-Financial Analysis

Tours Income Statement

| Preferred Alternative | Fishing Charter | Kayak/Canoe rental | Backcountry Outfitter | Boat Tours | Bicycle Rental | Snake Bight Tram | Total Tours |
|-------------------------|-----------------|--------------------|-----------------------|-------------|----------------|------------------|-------------|
| % Visitor Demand | 0.4% | 1.5% | 0.5% | 4.5% | 0.7% | 1.0% | |
| # Tours | 6,393 | 23,972 | 7,991 | 71,916 | 11,187 | 15,981 | |
| Rate | \$300 | \$25 | \$100 | \$15 | \$10 | \$6 | |
| Revenue | \$1,917,758 | \$599,299 | \$799,066 | \$1,078,739 | \$111,869 | \$95,888 | \$4,602,618 |
| Expenses | | | | | | | |
| Payroll & Benefits | \$359,626 | \$79,930 | \$259,720 | \$265,748 | \$21,187 | \$17,000 | \$986,211 |
| Marketing | \$19,178 | \$5,993 | \$7,991 | \$10,787 | \$1,119 | \$959 | \$45,067 |
| Utilities | \$19,178 | \$5,993 | \$7,991 | \$10,787 | \$1,119 | \$4,706 | \$45,067 |
| Repairs and Maintenance | \$163,009 | \$50,940 | \$67,921 | \$91,693 | \$9,509 | \$28,236 | \$383,072 |
| Other | \$191,776 | \$59,930 | \$79,907 | \$107,874 | \$11,187 | \$0 | \$450,673 |
| Total Expenses | \$752,767 | \$202,786 | \$423,528 | \$486,889 | \$44,120 | \$50,901 | \$1,910,090 |
| Net Operating Income | \$1,164,991 | \$396,513 | \$375,538 | \$591,850 | \$67,749 | \$44,987 | \$2,692,528 |

| Tours 20-year Cash Flow | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|-------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Revenue | | | | | | | | | |
| Fishing Charter | \$1,421,237 | \$1,568,827 | \$1,809,054 | \$1,843,171 | \$1,917,758 | \$1,927,832 | \$1,968,942 | \$2,007,242 | \$2,046,375 |
| Kayak/Canoe Rental | \$444,137 | \$490,258 | \$565,329 | \$575,991 | \$599,299 | \$602,448 | \$615,294 | \$627,263 | \$639,492 |
| Backcountry Outfitter | \$592,182 | \$653,678 | \$753,772 | \$767,988 | \$799,066 | \$803,263 | \$820,392 | \$836,351 | \$852,656 |
| Boat Tours | \$799,446 | \$882,465 | \$1,017,593 | \$1,036,783 | \$1,078,739 | \$1,084,406 | \$1,107,530 | \$1,129,074 | \$1,151,086 |
| Bicycle Rental | \$82,906 | \$91,515 | \$105,528 | \$107,518 | \$111,869 | \$112,457 | \$114,855 | \$117,089 | \$119,372 |
| Snake Bight Tram | \$71,062 | \$78,441 | \$90,453 | \$92,159 | \$95,888 | \$96,392 | \$98,447 | \$100,362 | \$102,319 |
| Total Revenue | \$3,410,969 | \$3,765,185 | \$4,341,729 | \$4,423,610 | \$4,602,618 | \$4,626,797 | \$4,725,460 | \$4,817,381 | \$4,911,300 |
| Expenses | | | | | | | | | |
| Labor | \$640,813 | \$691,055 | \$772,832 | \$784,446 | \$809,837 | \$813,266 | \$827,261 | \$840,299 | \$853,620 |
| Marketing | \$34,110 | \$37,652 | \$43,417 | \$44,236 | \$46,026 | \$46,268 | \$47,255 | \$48,174 | \$49,113 |
| Utilities | \$34,110 | \$37,652 | \$43,417 | \$44,236 | \$46,026 | \$46,268 | \$47,255 | \$48,174 | \$49,113 |
| Repairs and Maintenance | \$289,932 | \$320,041 | \$369,047 | \$376,007 | \$391,223 | \$393,278 | \$401,664 | \$409,477 | \$417,460 |
| Other | \$341,097 | \$376,519 | \$434,173 | \$442,361 | \$460,262 | \$462,680 | \$472,546 | \$481,738 | \$491,130 |
| Total Expenses | \$1,340,062 | \$1,462,918 | \$1,662,887 | \$1,691,286 | \$1,753,373 | \$1,761,760 | \$1,795,980 | \$1,827,862 | \$1,860,437 |
| Net Operating Income | \$2,070,908 | \$2,302,267 | \$2,678,843 | \$2,732,324 | \$2,849,245 | \$2,865,037 | \$2,929,480 | \$2,989,519 | \$3,050,863 |

A-11 Flamingo Commercial Services Plan-Financial Analysis

Tours Income Statement, Cont.

| 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 |
|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| \$2,086,362 | \$2,121,278 | \$2,156,899 | \$2,193,244 | \$1,526,035 | \$2,259,779 | \$2,294,041 | \$2,322,526 | \$2,351,574 | \$2,381,202 | \$2,411,433 |
| \$651,988 | \$662,899 | \$674,031 | \$685,389 | \$476,886 | \$706,181 | \$716,888 | \$725,789 | \$734,867 | \$744,126 | \$753,573 |
| \$869,318 | \$883,866 | \$898,708 | \$913,852 | \$635,848 | \$941,575 | \$955,850 | \$967,719 | \$979,822 | \$992,168 | \$1,004,764 |
| \$1,173,579 | \$1,193,219 | \$1,213,255 | \$1,233,700 | \$858,395 | \$1,271,126 | \$1,290,398 | \$1,306,421 | \$1,322,760 | \$1,339,426 | \$1,356,431 |
| \$121,704 | \$123,741 | \$125,819 | \$127,939 | \$89,019 | \$131,820 | \$133,819 | \$135,481 | \$137,175 | \$138,903 | \$140,667 |
| <u>\$104,318</u> | <u>\$106,064</u> | <u>\$107,845</u> | <u>\$109,662</u> | <u>\$76,302</u> | <u>\$112,989</u> | <u>\$114,702</u> | <u>\$116,126</u> | <u>\$117,579</u> | <u>\$119,060</u> | <u>\$120,572</u> |
| \$5,007,269 | \$5,091,067 | \$5,176,557 | \$5,263,785 | \$3,662,485 | \$5,423,470 | \$5,505,698 | \$5,574,063 | \$5,643,776 | \$5,714,886 | \$5,787,440 |
| | | | | | | | | | | |
| \$867,232 | \$879,118 | \$891,244 | \$903,617 | \$676,488 | \$926,266 | \$937,930 | \$947,627 | \$957,515 | \$967,601 | \$977,892 |
| \$50,073 | \$50,911 | \$51,766 | \$52,638 | \$36,625 | \$54,235 | \$55,057 | \$55,741 | \$56,438 | \$57,149 | \$57,874 |
| \$50,073 | \$50,911 | \$51,766 | \$52,638 | \$36,625 | \$54,235 | \$55,057 | \$55,741 | \$56,438 | \$57,149 | \$57,874 |
| \$425,618 | \$432,741 | \$440,007 | \$447,422 | \$311,311 | \$460,995 | \$467,984 | \$473,795 | \$479,721 | \$485,765 | \$491,932 |
| <u>\$500,727</u> | <u>\$509,107</u> | <u>\$517,656</u> | <u>\$526,378</u> | <u>\$366,249</u> | <u>\$542,347</u> | <u>\$550,570</u> | <u>\$557,406</u> | <u>\$564,378</u> | <u>\$571,489</u> | <u>\$578,744</u> |
| \$1,893,723 | \$1,922,787 | \$1,952,438 | \$1,982,693 | \$1,427,297 | \$2,038,078 | \$2,066,598 | \$2,090,309 | \$2,114,489 | \$2,139,153 | \$2,164,317 |
| <u>\$3,113,547</u> | <u>\$3,168,280</u> | <u>\$3,224,118</u> | <u>\$3,281,092</u> | <u>\$2,235,188</u> | <u>\$3,385,392</u> | <u>\$3,439,100</u> | <u>\$3,483,753</u> | <u>\$3,529,287</u> | <u>\$3,575,733</u> | <u>\$3,623,123</u> |

A-12 Flamingo Commercial Services Plan-Financial Analysis

Retail Income Statement

| Preferred Alternative | Marina Store | Gift Shop | Total Retail |
|-------------------------|--------------|-------------|--------------|
| Revenue | | | |
| Spending per Visitor | \$0.40 | \$0.65 | |
| Total Revenue | \$639,253 | \$1,038,785 | \$1,678,038 |
| Cost of Goods Sold | \$319,626 | \$519,393 | \$839,019 |
| Gross Profit | \$319,626 | \$519,393 | \$839,019 |
| Expenses | | | |
| Payroll & Benefits | \$98,925 | \$138,879 | \$237,804 |
| Supplies | \$9,589 | \$15,582 | \$25,171 |
| Utilities | \$9,589 | \$15,582 | \$25,171 |
| Marketing | \$6,393 | \$10,388 | \$16,780 |
| Repairs and Maintenance | \$6,393 | \$10,388 | \$16,780 |
| Other | \$127,851 | \$207,757 | \$335,608 |
| Total Expenses | \$258,738 | \$398,575 | \$657,313 |
| Net Operating Income | \$60,888 | \$120,818 | \$181,706 |

| Retail 20-year Cash Flow | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|--------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Revenue | | | | | | | | | |
| Marina Store | \$473,746 | \$522,942 | \$603,018 | \$614,390 | \$639,253 | \$642,611 | \$656,314 | \$669,081 | \$682,125 |
| Gift Shop | \$769,837 | \$849,781 | \$979,904 | \$998,384 | \$1,038,785 | \$1,044,242 | \$1,066,510 | \$1,087,256 | \$1,108,453 |
| Total Revenue | \$1,243,583 | \$1,372,724 | \$1,582,922 | \$1,612,774 | \$1,678,038 | \$1,686,853 | \$1,722,824 | \$1,756,337 | \$1,790,578 |
| Cost of Goods Sold | \$621,791 | \$686,362 | \$791,461 | \$806,387 | \$839,019 | \$843,427 | \$861,412 | \$878,168 | \$895,289 |
| Gross Operating Profit | \$621,791 | \$686,362 | \$791,461 | \$806,387 | \$839,019 | \$843,427 | \$861,412 | \$878,168 | \$895,289 |
| Expenses | | | | | | | | | |
| Labor | \$194,358 | \$207,272 | \$228,292 | \$231,277 | \$237,804 | \$238,685 | \$242,282 | \$245,634 | \$249,058 |
| Supplies | \$18,654 | \$20,591 | \$23,744 | \$24,192 | \$25,171 | \$25,303 | \$25,842 | \$26,345 | \$26,859 |
| Utilities | \$18,654 | \$20,591 | \$23,744 | \$24,192 | \$25,171 | \$25,303 | \$25,842 | \$26,345 | \$26,859 |
| Marketing | \$12,436 | \$13,727 | \$15,829 | \$16,128 | \$16,780 | \$16,869 | \$17,228 | \$17,563 | \$17,906 |
| Repairs and Maintenance | \$12,436 | \$13,727 | \$15,829 | \$16,128 | \$16,780 | \$16,869 | \$17,228 | \$17,563 | \$17,906 |
| Other | \$248,717 | \$274,545 | \$316,584 | \$322,555 | \$335,608 | \$337,371 | \$344,565 | \$351,267 | \$358,116 |
| Total Expenses | \$505,254 | \$550,453 | \$624,023 | \$634,471 | \$657,313 | \$660,399 | \$672,988 | \$684,718 | \$696,702 |
| Net Operating Income | \$116,537 | \$135,909 | \$167,438 | \$171,916 | \$181,706 | \$183,028 | \$188,424 | \$193,451 | \$198,587 |

A-13 Flamingo Commercial Services Plan-Financial Analysis

Retail Income Statement, Cont.

| | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 |
|--|--------------------|--------------------|--------------------|--------------------|------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| | \$695,454 | \$707,093 | \$718,966 | \$731,081 | \$508,678 | \$753,260 | \$764,680 | \$774,175 | \$783,858 | \$793,734 | \$803,811 |
| | <u>\$1,130,113</u> | <u>\$1,149,026</u> | <u>\$1,168,320</u> | <u>\$1,188,007</u> | <u>\$826,603</u> | <u>\$1,224,047</u> | <u>\$1,242,605</u> | <u>\$1,258,035</u> | <u>\$1,273,769</u> | <u>\$1,289,818</u> | <u>\$1,306,193</u> |
| | \$1,825,567 | \$1,856,118 | \$1,887,286 | \$1,919,088 | \$1,335,281 | \$1,977,307 | \$2,007,286 | \$2,032,210 | \$2,057,627 | \$2,083,552 | \$2,110,004 |
| | \$912,783 | \$928,059 | \$943,643 | \$959,544 | \$667,641 | \$988,653 | \$1,003,643 | \$1,016,105 | \$1,028,813 | \$1,041,776 | \$1,055,002 |
| | \$912,783 | \$928,059 | \$943,643 | \$959,544 | \$667,641 | \$988,653 | \$1,003,643 | \$1,016,105 | \$1,028,813 | \$1,041,776 | \$1,055,002 |
| | \$252,557 | \$255,082 | \$257,633 | \$260,209 | \$262,812 | \$265,440 | \$268,094 | \$270,775 | \$273,483 | \$276,218 | \$278,980 |
| | \$27,384 | \$27,657 | \$27,934 | \$28,213 | \$28,495 | \$28,780 | \$29,068 | \$29,359 | \$29,652 | \$29,949 | \$30,248 |
| | \$27,384 | \$27,657 | \$27,934 | \$28,213 | \$28,495 | \$28,780 | \$29,068 | \$29,359 | \$29,652 | \$29,949 | \$30,248 |
| | \$18,256 | \$18,438 | \$18,623 | \$18,809 | \$18,997 | \$19,187 | \$19,379 | \$19,573 | \$19,768 | \$19,966 | \$20,166 |
| | \$18,256 | \$18,438 | \$18,623 | \$18,809 | \$18,997 | \$19,187 | \$19,379 | \$19,573 | \$19,768 | \$19,966 | \$20,166 |
| | <u>\$365,113</u> | <u>\$368,765</u> | <u>\$372,452</u> | <u>\$376,177</u> | <u>\$379,938</u> | <u>\$383,738</u> | <u>\$387,575</u> | <u>\$391,451</u> | <u>\$395,365</u> | <u>\$399,319</u> | <u>\$403,312</u> |
| | \$708,948 | \$716,038 | \$723,198 | \$730,430 | \$737,735 | \$745,112 | \$752,563 | \$760,089 | \$767,690 | \$775,366 | \$783,120 |
| | <u>\$203,835</u> | <u>\$212,021</u> | <u>\$220,445</u> | <u>\$229,114</u> | <u>-\$70,094</u> | <u>\$243,541</u> | <u>\$251,080</u> | <u>\$256,017</u> | <u>\$261,124</u> | <u>\$266,410</u> | <u>\$271,882</u> |

A-14 Flamingo Commercial Services Plan-Financial Analysis

Phased Development Return on Investment

| Phase | IRR | Construction Cost | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 |
|----------------|-------|-------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|------------------------------|
| Phase 1 | 30.2% | (\$7,708,000) | \$1,985,702 | \$1,992,396 | \$2,351,895 | \$2,456,682 | \$2,569,148 | \$2,604,363 | \$2,666,632 | \$2,732,228 | \$2,798,379 | \$2,865,939 |
| Phase 2 | 22.8% | (\$11,386,000) | \$1,965,623 | \$2,056,618 | \$2,583,527 | \$2,742,132 | \$2,899,430 | \$2,945,578 | \$3,027,465 | \$3,116,043 | \$3,205,184 | \$3,296,363 |
| Phase 3 | 18.3% | (\$16,425,000) | \$2,160,940 | \$2,301,176 | \$2,975,438 | \$3,161,986 | \$3,358,698 | \$3,402,696 | \$3,497,129 | \$3,598,404 | \$3,700,452 | \$3,804,991 |
| Phase 4 | 9.7% | (\$6,460,000) | \$658,073 | \$666,741 | \$676,208 | \$686,506 | \$696,960 | \$707,414 | \$718,026 | \$728,796 | \$739,728 | \$750,824 |
| Full Build-Out | 17.6% | (\$22,885,000) | \$3,262,395 | \$3,576,188 | \$4,077,354 | \$4,167,017 | \$4,338,139 | \$4,376,119 | \$4,476,587 | \$4,571,694 | \$4,668,743 | \$4,767,785 |
| | | | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 |
| | | | \$2,927,917 | \$2,989,822 | \$3,052,988 | \$2,087,438 | \$3,002,534 | \$3,215,909 | \$3,262,725 | \$3,309,034 | \$3,356,297 | \$3,404,549 |
| | | | \$3,381,535 | \$3,466,280 | \$3,552,911 | \$2,035,763 | \$3,427,077 | \$3,778,307 | \$3,841,588 | \$3,903,772 | \$3,967,391 | \$4,032,499 |
| | | | \$3,900,364 | \$3,995,293 | \$4,092,471 | \$2,155,485 | \$3,936,654 | \$4,340,364 | \$4,407,738 | \$4,473,843 | \$4,541,629 | \$4,611,162 |
| | | | \$762,086 | \$773,518 | \$785,120 | \$785,991 | \$786,863 | \$787,734 | \$788,605 | \$789,476 | \$790,347 | \$791,219 |
| | | | \$4,860,547 | \$4,955,153 | \$5,051,654 | \$3,511,114 | \$5,208,364 | \$5,289,094 | \$5,356,525 | \$5,425,309 | \$5,495,492 | \$5,567,122 |
| | | | | | | | | | | | | Leasehold Surrender Interest |
| | | | | | | | | | | | | \$1,001,000 |
| | | | | | | | | | | | | \$721,600 |
| | | | | | | | | | | | | \$1,007,800 |
| | | | | | | | | | | | | \$1,292,000 |
| | | | | | | | | | | | | \$4,022,400 |

A-15 Flamingo Commercial Services Plan-Financial Analysis

Required Internal Rate of Return and Associated Funding Gap

| Scenario | IRR | Funding Gap | Investment | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 |
|----------|-----|-------------|---------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Low | 15% | \$0 | -\$22,885,000 | \$3,262,395 | \$3,576,188 | \$4,077,354 | \$4,167,017 | \$4,338,139 | \$4,376,119 | \$4,476,587 | \$4,571,694 | \$4,668,743 | \$4,767,785 |
| Medium | 18% | \$455,753 | -\$22,429,247 | \$3,262,395 | \$3,576,188 | \$4,077,354 | \$4,167,017 | \$4,338,139 | \$4,376,119 | \$4,476,587 | \$4,571,694 | \$4,668,743 | \$4,767,785 |
| High | 20% | \$2,700,496 | -\$20,184,504 | \$3,262,395 | \$3,576,188 | \$4,077,354 | \$4,167,017 | \$4,338,139 | \$4,376,119 | \$4,476,587 | \$4,571,694 | \$4,668,743 | \$4,767,785 |

| | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | Leasehold Surrender Interest |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|------------------------------|
| | \$4,860,547 | \$4,955,153 | \$5,051,654 | \$3,510,580 | \$5,207,295 | \$5,287,490 | \$5,354,387 | \$5,422,637 | \$5,492,285 | \$5,563,381 | \$4,022,400 |
| | \$4,860,547 | \$4,955,153 | \$5,051,654 | \$3,510,580 | \$5,207,295 | \$5,287,490 | \$5,354,387 | \$5,422,637 | \$5,492,285 | \$5,563,381 | \$4,022,400 |
| | \$4,860,547 | \$4,955,153 | \$5,051,654 | \$3,510,580 | \$5,207,295 | \$5,287,490 | \$5,354,387 | \$5,422,637 | \$5,492,285 | \$5,563,381 | \$4,022,400 |

A-16 Flamingo Commercial Services Plan-Financial Analysis

Project Phasing, Construction Cost, Leasehold Surrender Interest

| Phase Element | Start Date | Initial Cost | 20-year Depreciation | Leasehold Surrender Interest |
|--|------------|---------------------|----------------------|------------------------------|
| 1 Canoes | 2013 | \$24,000 | \$24,000 | \$0 |
| 1 Kayaks | 2013 | \$39,000 | \$39,000 | \$0 |
| 1 Bicycles | 2013 | \$10,000 | \$10,000 | \$0 |
| 1 Skiffs | 2013 | \$70,000 | \$70,000 | \$0 |
| 1 Houseboats | 2013 | \$2,000,000 | \$2,000,000 | \$0 |
| 1 Snack bar/Mini lounge (Marina) | 2013 | \$330,000 | \$264,000 | \$66,000 |
| 1 Elec hook-ups for RVs | 2013 | \$160,000 | \$160,000 | \$0 |
| 1 Concessioner housing-Part 1 | 2013 | \$4,425,000 | \$3,540,000 | \$885,000 |
| 1 Tour boats | 2013 | \$350,000 | \$350,000 | \$0 |
| 1 Restroom w/ hot showers for camping area | 2013 | \$250,000 | \$200,000 | \$50,000 |
| 1 Internal circulator shuttle | 2013 | \$50,000 | \$50,000 | \$0 |
| 2 Cottages/Cabins | 2015 | \$2,923,000 | \$2,338,400 | \$584,600 |
| 2 Gift shop | 2015 | \$685,000 | \$548,000 | \$137,000 |
| 2 Snake Bight tram | 2015 | \$70,000 | \$70,000 | \$0 |
| 3 Eco-tents | 2016 | \$1,789,000 | \$1,431,200 | \$357,800 |
| 3 Restroom w/ hot showers for Eco-tents | 2016 | \$600,000 | \$480,000 | \$120,000 |
| 3 Concessioner housing- Part 2 | 2016 | \$2,650,000 | \$2,120,000 | \$530,000 |
| 4 Lodge w/ restaurant | 2017 | \$6,260,000 | \$5,008,000 | \$1,252,000 |
| 4 Swimming pool | 2017 | \$200,000 | \$160,000 | \$40,000 |
| TOTAL | | \$22,885,000 | \$18,862,600 | \$4,022,400 |

A-17 Flamingo Commercial Services Plan-Financial Analysis

Appendix F
PUBLIC COMMENTS AND RESPONSES
(DRAFT CSP/EA AND ALTERNATIVE D)

Flamingo Commercial Services Plan
Environmental Assessment

The *Flamingo Commercial Services Plan Environmental Assessment (EA)* was on public review from November 17, 2007, through January 25, 2008. During the public comment period, a total of 94 (603 signatures) correspondences were received. Within these 94 correspondences there were 504 form letters. Substantive comments were analyzed consistent with the guidance provided in the National Park Service's (NPS) *Director's Order 12*, the National Park Service (NPS) guideline for environmental compliance. Comments are considered substantive when they: a) question, with reasonable basis, the accuracy of information in the draft EA, b) question, with reasonable basis, the adequacy of the environmental analysis, c) present reasonable alternatives other than those presented in the EA, or d) cause changes or revisions in the proposal. Comments that state a preference for one alternative (or component of an alternative), state opinions, or are outside the scope of the project, are not considered substantive. Many of these comments were used to formulate the preferred Alternative D, which was released for an additional 30-day review period from April 11, 2008, to May 15, 2008. None of the comments received on the preferred alternative resulted in substantive changes in the preferred alternative as presented for review, although some clarifications were added to the EA through the Errata sheets (Appendix A).

The following summarizes the substantive comments (grouped as concern statements) and the NPS response to those concerns for both the initial EA release and the preferred alternative release for public comment.

COMMENTS ON DRAFT EA

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| Comments Related to Alternatives | |
| Some commenters stated that the continuation of certain services would improve Flamingo, such as the reservation system for accommodations, the Post Office, and the availability of picnic areas. | These elements are included in the preferred alternative (Alternative D). |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>Some commenters expressed concern over the restoration processes that will be occurring at Flamingo, in particular the restoration of ponds and the restoration of water volume.</p> | <p>Based on strong public input on the alternatives in the draft CSP/EA, the preferred alternative does not call for the restoration of Eco Pond and surrounding area. Eco Pond will be maintained as a public use/wildlife viewing area, allowing for self- and guided-tours and programs. Since Eco Pond no longer serves as the tertiary treatment area for Flamingo wastewater the presence of water in Eco Pond is now rainfall-driven and over time Eco Pond conditions will likely revert to coastal prairie habitat as it was before the Everglades National Park's (Park) original development of Flamingo.</p> |
| <p>Some commenters expressed the importance of being able to enjoy a clear night sky without the hindrance of light pollution and suggested the park provide telescopes to enhance this experience.</p> | <p>The Park recognizes the night sky values and opportunities and will include night sky programs as part of the educational opportunities offered at Flamingo.</p> |
| <p>One commenter stated that all aspects of the redevelopment of Flamingo should reflect the history and cultural aspects of Old Florida.</p> | <p>During design and redevelopment of Flamingo, historic and cultural resource elements will be considered in implementing the preferred alternative (Alternative D).</p> |
| <p>Some commenters suggested new services that could be included into the Comprehensive Service Plan (CSP), such as the establishment of a yellow bike system, selling merchandise on the Park's website, fee structures for watercraft, an indoor picnic area in place of the old gas station, implementing a shuttle service to reduce roadkill, placing a flag on every flag pole, and the inclusion of boardwalks.</p> | <p>These elements are noted and are either included in the preferred alternative (Alternative D) or will be incorporated as appropriate as site planning, design and constructions begins.</p> |
| <p>One commenter suggested that the concrete footprint in Flamingo be reduced by 50 percent to allow for a more natural experience in the Park.</p> | <p>Implementing the preferred alternative (Alternative D) will result in a large reduction in the development footprint at Flamingo.</p> |
| <p>Commenters provided suggestions as to which amenities should be included into lodging, such as hot showers, a conference room for lectures, air conditioning, and a bug-free atmosphere. The price of the accommodations was also a concern.</p> | <p>These elements are noted and are either included in the preferred alternative (Alternative D) or will be incorporated as appropriate as site planning and design begins. The financial analysis developed as part of the plan that demonstrated financial feasibility used rates that were similar to those charged at Flamingo in the last 3 years.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>Commenters provided some suggestions as to the types and location of lodging that should be developed within Flamingo. Lodging types suggested included cabins, monolithic domes, and a lodge that is in harmony with nature.</p> | <p>Cabins or cottages are part of the preferred alternative (Alternative D). Other options will be fully explored during site planning and design phase of project implementation.</p> |
| <p>Commenters provided suggestions for development of the lodging including following Dade County building codes and phasing rebuilding.</p> | <p>State of Florida and Monroe County building codes (Flamingo is within Monroe County) will be followed. Project phasing options will also be considered so that implementation occurs efficiently while seeking opportunities to return visitor facilities back to Flamingo as soon as possible.</p> |
| <p>Commenters felt that a variety of dining options would be best for the Park and the visitors, such as a café, a snack bar, and a sit-down restaurant with a gift shop.</p> | <p>These options are all included in the preferred alternative (Alternative D).</p> |
| <p>Commenters noted the importance of the Marina and made suggestions as to which services should be provided at the Marina, such as a propane vendor and a pump-out station for boats.</p> | <p>These options will be fully explored during project implementation including the process of seeking a long-term concession contract for the operator of Flamingo facilities.</p> |
| <p>Commenters noted the numerous possibilities of eco-tourism activities at Flamingo, such as biking, hiking, birding and canoeing. They also stressed the importance of low-impact tourism.</p> | <p>The preferred alternative (Alternative D) has a wide range of eco-tourism activities that will enhance visitor opportunities for understanding and experiencing the Park.</p> |
| <p>Commenters stated the importance of fishing at Flamingo and suggested that an improved Marina and additional fishing related services and amenities would attract more visitors to the Park and be beneficial for visitors such a ramps, a fish cleaning station, and a store.</p> | <p>These options are all included in the preferred alternative (Alternative D).</p> |
| <p>Commenters suggested that fish populations, especially in the inland waterways, are severely depleted due to overfishing. One suggestion was to cease fishing activities in the vicinity of the Marina until the fish population gets reestablished.</p> | <p>Scientists and researchers from the Park and other organizations continue to monitor and assess fisheries issues in the Park. In addition, boating and fishing opportunities are being considered in the General Management Plan (GMP), now being developed. There is currently no evidence of severely depleted fish species. The Park is committed to maintaining healthy fish populations while providing for appropriate recreational use. Should there be evidence of depleted fisheries, Park managers would take necessary actions to understand conditions and address species recovery strategies.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>Commenters suggested different ways in which visitors may be exposed to increased interpretive programs and educational services, such as ranger led lectures, improved signage, and ranger led hikes, and using fund for eco-tents for education instead. One commenter suggested visitors be educated before they enter the Park.</p> | <p>These options die improved services and amenities are included in the preferred alternative (Alternative D). The park believes the eco-tents are an important part of the lodging mix for Flamingo.</p> |
| <p>Some commenters questioned the necessity of the proposed reintroduction of the Tram at Snake Bight Trail.</p> | <p>Public comments received during project scoping in 2006 suggested that the Snake Bight Tram was an important part of the visitor experiences at Flamingo in past years and that there was merit to reinstating that opportunity. This remains part of the preferred alternative (Alternative D).</p> |
| <p>One commenter states that the reintroduction of the Tram at Snake Bight Trail would enhance interpretive services at Flamingo, thus increasing the number of visitors at the Park.</p> | <p>See previous comment/response. This element is part of the preferred alternative (Alternative D).</p> |
| <p>Commenters stressed the importance of ranger led tours and suggested that these tours be increased.</p> | <p>This is part of the preferred alternative (Alternative D), identifying new and expanded tours in and around Flamingo.</p> |
| <p>Commenters suggested that it may be advantageous for the concessionaire to rent trailers with adequate amenities for overnight accommodations.</p> | <p>Depending on funding scenarios, project phasing options, and the overall implementation schedule, there may be an opportunity for the concessioner to offer trailers to be part of the mix for overnight accommodations.</p> |
| <p>Comments suggestions to improve the boat ramps and docks at Flamingo, such as separate docks for motorboats and kayaks/canoes, adding floating docks, and replacing the hoist over the plug.</p> | <p>Separate docks and floating docks have been installed for Florida Bay marina and are soon to be included in the rebuilding of the Whitewater Bay marina. Additional options to enhance motor and non-motor boat access is also being considered in the GMP, now underway. Replacement to the boat hoist is part of the preferred alternative (Alternative D).</p> |
| <p>Commenters felt that the inclusion of a viewing platform at Snake Bight would significantly improve wildlife viewing opportunities, thus attracting more visitors. They also felt that the visitor experience would be enhanced by including safer bike paths.</p> | <p>The park is considering the addition of a viewing platform at the end of Snake Bight Trail to enhance its potential as a premier wildlife viewing location, in addition to other opportunities to improve visitor experiences. The preferred alternative (Alternative D) includes increased and safer bike paths.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>Once commenter recommended that a portion of the Bear Lake Canoe Trail be cleared of fallen debris that has been blocking the trail since the 2005 hurricanes.</p> | <p>The Park is pursuing the clearing and re-opening of the Bear Lake Canoe Trail to enhance visitor opportunities in the Flamingo area.</p> |
| <p>Commenters suggested that certain areas be reserved for the expansion of current trails and the establishment of future trails, such as the bay side of the Park that connects to Loop A, and along the bay. Creating safer bike paths along the roadway was also suggested.</p> | <p>The preferred alternative includes an expanded, safer trail network that will enhance access and recreational opportunities throughout the Flamingo area. The details will be worked out in site planning and design.</p> |
| <p>Some commenters felt that a pool at Flamingo would be beneficial due to the hot and humid climate, noting that swimming in the Bay is prohibited.</p> | <p>A modest, eco-friendly swimming pool is part of the preferred alternative.</p> |
| <p>Once commenter suggested that if a pool is incorporated into the Plan, it should be complimentary to its surroundings, while also utilizing salt-water filtration instead of chlorine.</p> | <p>See previous comment/response. The pool will be designed to minimize impacts and be as environmentally sustainable as possible.</p> |
| <p>Commenters questioned the inclusion of a pool in the CSP. Some commenters felt that it could be replaced with a kids play area and an area for adults to socialize and others thought it would be too expensive.</p> | <p>A modest pool has been included in the preferred alternative (Alternative D) to address strong public interest in this amenity. Park managers weighed the public benefit against the potential costs and determined that a modest pool designed to minimize impacts and be as environmentally sustainable as possible is appropriate at Flamingo. This amenity would be part of the mix of opportunities available for overnight visitors and would help enhance the concessioner's business opportunity. Gathering areas for social activities are also included.</p> |
| <p>Commenters suggested expanding the Visitor Center and adding emphasis on educational exhibits and a film viewing area.</p> | <p>The Visitor Center will be expanded as part of the preferred alternative (Alternative D), as it will be relocated to the former Flamingo Restaurant site, allowing for more and better exhibits, increased programming options, and improved space for visitor orientation and education.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>Commenters expressed concern at the cost for implementing the alternatives and felt that this may prevent them from being implemented. One commenter suggested that the budget be limited, as any investment could be lost due to weather.</p> | <p>Based on all the public input and detailed analysis done to develop the plan, park managers are confident that the preferred alternative (Alternative D) offers the most sensible approach to rebuilding Flamingo. A key issue at Flamingo will always be the risk of building in a high hazard flood zone and how that impacts investment potential. As work on project implementation begins in the summer of 2008 (exploring site planning, design and funding options to minimize risk and impacts), the most effective implementation strategies should begin to emerge, including options for project financing and phasing.</p> |
| <p>Commenters stated that Eco Pond provides many benefits to visitors, allowing enhanced wildlife viewing. Commenters asked the Eco Pond not be filled in. While some commenters supported Alternative C, they did not support the aspect of it that would fill-in Eco Pond.</p> | <p>The preferred alternative (Alternative D) does not call for the filling in of Eco Pond. Eco Pond will remain a visitor use area, although since it is no longer connected to the Flamingo wastewater system its function will continue to change over time.</p> |
| <p>One commenter suggested that parking be added to the Eco Pond area.</p> | <p>During site planning and design the Flamingo road and parking network will be examined for ways to improve circulation and access to facilities and visitor use areas, including safe and efficient parking options for Eco Pond.</p> |
| <p>Commenters supported the provision of camping at Flamingo, feeling this was important for providing access. They also felt that the number of campsites at Flamingo should not be reduced.</p> | <p>Camping will always be an important part of the Flamingo experience. The plan's financial analysis, based on past, present and future demand for camping (including its seasonal nature) indicated that about 130 tent sites (including group sites) plus 40 recreational vehicles (RV) sites was the appropriate number of units. In addition, the 40 eco-tents and two double chickees in Florida Bay added to the mix of lodging options determined to be desirable to visitors interested in camping experiences.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>Commenters stated opposition to a concession run campground feeling that this would raise costs and detract from the national park experience.</p> | <p>The financial analysis for the CSP concluded that the best opportunity for attracting a high quality concessioner to Flamingo was by including management of the campground as part of the services they would provide. Rates for camp sites used in the financial analysis were only slightly higher than current rates charged and rates for RV sites with electric included in the plan were modestly higher than the current for RV rates (without electric). Having a concessioner-operated campground does not reduce the park's commitment to having an important presence in camping areas at Flamingo so that visitors have a high quality experience at a fair price.</p> |
| <p>Commenters asked that more camping options beyond the campground be provided. Suggestions included more areas for kayakers and the use of chickees.</p> | <p>The preferred alternative (Alternative D) includes two new double chickees in Florida Bay, a day's paddle from Flamingo that could accommodate up to 24 visitors per night. These new sites together with existing backcountry sites in proximity to Flamingo and options being considered in the GMP (now underway), will enhance camping options.</p> |
| <p>Commenters provided suggestions for amenities and operation of the campground. Suggestions included not providing hook-ups, providing electricity, providing some sites on a first come/first serve basis, providing different kinds of sites (hook-up, non-hookup), renting trailers through a concession, and constructing new bathhouses.</p> | <p>The preferred alternative (Alternative D) provides the framework for future camping at Flamingo and includes most of the suggestions offered in this comment (electric hookups, non-hookup sites, new bathhouses) while allowing for other details to be determined during plan implementation (reservation system vs. first come-first served, options for utilizing rental trailers).</p> |
| <p>Commenters asked the RVs be accommodated at Flamingo. Suggestions to provide this included a separate RV park, the location of where RV camping should occur in the Park, and providing electrical hook ups to reduce noise from generators.</p> | <p>RVs will be accommodated at Flamingo at the T Loop (same as current RV location) with the installation of electric hookups to each site (to reduce noise and air pollution from use of generators).</p> |
| <p>Commenters asked that the Park provide eco-tents or a similar eco-camping experience. Concerns were raised with this concept as to a potential lack of privacy with eco tents and the potential for noise if yurts used air conditioners.</p> | <p>The preferred alternative (Alternative D) calls for 40 eco-tents to be constructed. During site planning and design, strategies to provide privacy and reduce adverse impacts such as noise will be critical issues to address.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>Commenters stated support of providing houseboats at Flamingo, feeling that they would provide overnight lodging and a source of income for the park.</p> | <p>The preferred alternative (Alternative D) calls for 8 houseboats at Flamingo (32 beds). This would be the largest number of houseboats ever provided at Flamingo and would meet a use for which the public expressed strong support.</p> |
| <p>Commenters raised concerns regarding fishing camps including promoting overfishing in the area and if they are a permissible use.</p> | <p>The preferred alternative (Alternative D) does not include the fish camp that was initially described in the draft CSP/EA under Alternative C.</p> |
| <p>Commenters suggested a phased approach to the redevelopment of Flamingo. Commenters provided suggestions for phasing, with most suggesting that various lodging be restored first.</p> | <p>The preferred alternative (Alternative D) discusses phasing as a very real part of implementation (and recommends a four part strategy that would be reexamined during implementation planning) due to the high cost to implement the entire plan and the strong interest by the public to see near-term progress in returning services to Flamingo. Different overnight accommodations would be included in each phase (see Page 2 of the Findings of No Significant Impact</p> |
| <p>One commenter voiced support for providing space for scientific research and suggested that this also include meeting space in the lodge for class room instruction or other presenters.</p> | <p>The preferred alternative (Alternative D) would begin to provide support for scientific researchers visiting the Park, and include meeting space for programs and Park-related activities. Additional requirements will also be included in the GMP, now underway.</p> |
| <p>Commenters provided support for incorporation of green and sustainable design principals at Flamingo. The offered suggestions for accomplishing this type of design including the use of re-enforced concrete buildings, creating a walkable design, incorporation of Leadership in Energy and Environmental Design principals, incorporation of a recycling program, use of solar water heaters, highlighting Eco Pond in the design, and participation in the Florida Green Lodging Program.</p> | <p>Through the implementation of the preferred alternative (Alternative D), the park is committed to rebuilding Flamingo and having it function in a sustainable way. During site planning and design work the details listed in this comment, and many other ideas and examples that have been successful elsewhere will be considered. The Park is also committed to showcasing Flamingo as a place to teach and bring increased understanding to this issue.</p> |
| <p>Commenters raised some questions regarding the use of sustainable/ecological design at Flamingo including discouraging the use of buildings that would need to be moved seasonally and concerns about proposals for the use of solar energy for RV hookups.</p> | <p>The preferred alternative (Alternative D) is based on strong and overwhelming support by the public and the NPS for reestablishing facilities and programs at Flamingo, and the NPS has a commitment to sustainability in its designs and plans. This plan provides the framework for that effort. Site planning and design will further guide the most appropriate strategies for rebuilding in a sustainable, yet feasible manner.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>One commenter stated support for concession operations at the Park, stating that successful concessions would encourage future business in the Park.</p> | <p>The park also believes that concessions operations would enhance future business opportunities in the park consistent with the Park's mission.</p> |
| <p>One commenter stated opposition to using outside commercial services, feeling that this would privatize the Park.</p> | <p>Concessions and commercial services is a long established activity throughout the NPS and the Park.</p> |
| <p>Commenters stated concern that the current concession operator at the park may cease operations. They stated that this would cause the marina and gas station to close down, and finding any replacement would be difficult.</p> | <p>The park released a prospectus for a five-year concession contract for Flamingo on May 9, 2008, and hopes to have the new concessioner operating the facilities at Flamingo later this year.</p> |
| <p>Commenters stated that the no action alternative was not acceptable as it did not allow visitors the ability to fully experience the Park.</p> | <p>This was the view of nearly all of the public that participated in the planning process. The no action alternative was included as a baseline alternative per the requirements of National Environmental Policy Act. The Park has identified a preferred alternative (Alternative D) that will reestablish a wide range of facilities and programs at Flamingo.</p> |
| <p>Commenters stated support for Alternative B, while suggesting elements that should be included in the alternative. These elements included buildings suited for an environment with hurricanes, mosquito screening, incorporation of state of the art environmental and architectural considerations, and retention of some car camping areas.</p> | <p>These comments were considered in developing the preferred alternative (Alternative D) and will be part of the plan to be implemented at Flamingo.</p> |
| <p>Commenters stated support for Alternative C. Specific elements they supported included the provision of houseboats, guided tours, kayak and canoe launches, the restoration of wetlands, providing new opportunities for children.</p> | <p>These comments were considered in developing the preferred alternative (Alternative D) and will be part of the plan to be implemented at Flamingo.</p> |
| <p>Commenters stated support for Alternative C but suggested modifications to the alternative. Suggestions for modifying Alternative C included placing more emphasis on resource protection and restoration, retaining the Eco Pond, expanding the car camping area, and reconsideration of the use of eco-tents because of Florida's climate.</p> | <p>These comments were considered in developing the preferred alternative (Alternative D) and will be part of the plan to be implemented at Flamingo. The park is believes that the preferred alternative brings more focus to the resource protection and restoration while also providing for a range of appropriate visitor opportunities. The eco-tents have been included in the preferred alternative as there are examples of their success and popularity at other parks in sub-tropical environments.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| Comments on Visitor Use and Surrounding Communities | |
| One commenter felt that the draft CSP/EA did not adequately consider access for those with disabilities and called attention to the ADA Accessibility Guidelines for Recreational Facilities. | The park is committed to fulfilling its obligations under ADA. During site planning and design for implementing the preferred alternative (Alternative D), detailed strategies for making Flamingo as accessible as possible will be explored. |
| One commenter noted that the economy of surrounding communities is linked to actions of the Park, and that the Park should coordinate with the communities during this process. | The Park, the community and business leaders have and will continue to coordinate on this project. During implementation that coordination will continue and be even more critical. |
| Comments on Natural Resources | |
| Commenters expressed concern regarding the impact of the proposed action on water resources. Specific concerns included not enough attention to minimizing non-point source pollution (stormwater runoff); not adequately analyzing the potential increase in boating activity in the area; and the impact of boats and diesel fuel to water resources. | The draft CSP/EA carefully analyzed impacts to water resources (water quality, wetlands and floodplains) and acknowledges that with a developed area like Flamingo there will be some adverse impacts. Park managers believe that the preferred alternative (Alternative D) outlines design and project implementation features that will minimize adverse impacts mentioned such as non-point source pollution (creating porous surfaces, adding stormwater collection features), and that issues such as boating related impacts will be better managed through the strategies currently being analyzed in the GMP (that will be released for public review and comment later in 2008). As site planning and design for the project begins more precise solutions to protect the Park's water resources will be defined. |
| One commenter suggested elements for species protection, stating that the use of red lights should be utilized to protect the sea turtle populations. | This idea will be considered in the site planning and design phase of project implementation. |
| Commenters stated that wildlife should be given priority over human use and that impacts to natural systems be minimized under the draft CSP/EA. | The Wilderness Act and the Park's commitments to maintain the Marjory Stoneman Douglas wilderness area were considered in developing the plan. While nearly all of the actions proposed in this plan are outside of the designated wilderness area, one of the objectives of the plan was to provide appropriate opportunities to experience the Park's resources, including its wilderness. Implementing the preferred alternative (Alternative D) should achieve that objective. |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>One commenter stated that the Park should consider the Wilderness Act in its actions.</p> | <p>Consistent with the Park’s mission and the objectives for this plan is the need to protect resources (natural and cultural) for current and future generations. Park managers believe the preferred alternative (Alternative D) provides for visitor opportunities offered nowhere else in the Park that brings the understanding, appreciation and enjoyment of the park that is essential for its long-term protection. The preferred alternative provides strong resource protection measures, through a reduced development footprint, strong mitigation measures, and emphasis on education that reduces potential impacts to wildlife and other resources in wilderness areas.</p> |
| <p>Commenters stated that wildlife should be given priority over human use and that impacts to natural systems be minimized under the draft CSP/EA.</p> | <p>The park is looking at a range of strategies to minimize/reduce road kill including examination of speed limits on park roads, increased education and enforcement, and specifically within Flamingo the use of alternative transit (shuttles, bicycles, more walking/biking trails) to reduce the use of motorized vehicles.</p> |
| <p>One commenter stated that the draft CSP/EA did not adequately address cumulative impacts related to road kill. The commenter felt that an increase in visitation at Flamingo would result in more mortality from animal/vehicle collision.</p> | <p>The cumulative impacts analysis for wildlife and wildlife habitat does recognize the impacts of increased visitation and transportation projects, which include impacts from road kill. This issue will be also be considered in the site planning and design phase of project implementation.</p> |
| <p>The state of Florida review of the draft CSP/EA stated that various permits would be required during the redevelopment process. The permits and processes listed included: the Unified Mitigation Assessment Methodology for wetlands; an Environmental Resource Permit for wetlands; Department of Environmental Protection permits for wastewater projects; and a National Pollution Discharge Elimination System and Department of Environmental Protection permits for stormwater.</p> | <p>The park understands the requirements associated with plan implementation including the permits described in this comment. The Park is committed to working closely with the appropriate State agencies to secure the permits required for plan implementation.</p> |

| Comments on Purpose and Need or Background | |
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| <p>One commenter suggested that the purpose and need should be revised. Concerns included not enough emphasis on the history of the area in terms of storms and flooding, and not addressing if the public should pay to rebuild in an area with such a history.</p> | <p>While the purpose and need for the project does not specifically address this comment, the primary project objective does. This objective recognizes the risks and challenges associated with building facilities at Flamingo. The plan and accompanying financial analysis are based on the concessioner, and not the public, paying for the facilities. However, there is discussion regarding a joint venture to fund the rebuilding effort (some public funds coupled with private financing from the concessioner and perhaps others interested in supporting the rebuilding effort). Park managers, based in part on the overwhelming public sentiment, believe that rebuilding Flamingo is appropriate, if done with sustainable design and development strategies that minimize threats and potential impacts from hurricanes and other storm events. Public comment was nearly unanimous that rebuilding Flamingo was a worthwhile public investment.</p> |
| <p>One commenter stated that overfishing is in conflict with the land management laws and mandates of the NPS.</p> | <p>Scientists and researchers from the Park and other organizations continue to monitor and assess fisheries issues in the Park. There is currently no evidence of overfishing in the Park. The Park is committed to maintaining healthy fish populations while providing for appropriate recreational use. Should there be evidence of overfished species, Park managers would take necessary actions to understand conditions and address species recovery strategies. It is anticipated that following completion of the GMP (now underway), the Park would initiate a Fisheries Plan to fully document the health of the fisheries and identify goals and strategies to maintain healthy populations and improve ones that are not.</p> |

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| <p>Commenters felt that the objective of this action should be to preserve and protect the resources, including wildlife, and that Flamingo should be restored to its natural state.</p> | <p>One of the important objectives of the plan is to protect and preserve wildlife and other resources, and the CSP and preferred alternative focused considerable attention to insuring that this objective was fully met. At the same time, providing for visitor use and enjoyment at Flamingo with a range of appropriate services and opportunities was another objective. Overall, Park managers believe that the preferred alternative does the best job of meeting these two and other project objectives, and that restoring Flamingo to its natural state would not meet the full range of objectives as well.</p> |
| <p>Comments on Consultation and Coordination</p> | |
| <p>State agency review of the draft CSP/EA requested various levels of consultation and coordination as the CSP is implemented. These requests included coordinating with Monroe County to be consistent with the goals of the county's comprehensive plan; continued coordination with the Florida Department of Environmental Protection regarding proposed water and wastewater systems; stormwater management; building demolition; and mangrove trimming projects; providing asbestos notification to the Department of Environmental Protection, if necessary.</p> | <p>The Park will conduct necessary consultation and coordination with appropriate State agencies throughout project implementation.</p> |
| <p>Commenters suggested that the Park coordinate with local business and community leaders during the redesign process at Flamingo.</p> | <p>The Park is committed to working cooperatively throughout the design and rebuilding efforts at Flamingo to enhance Park – community interests in this project.</p> |
| <p>The State of Florida review of the draft CSP/EA found it to be consistent with the Florida Coastal Management Program, stating that further review would be necessary in later development stages.</p> | <p>The Park understands the requirements associated with plan implementation. The Park is committed to required coordination and consultation during permitting and construction phases of components of the preferred alternative.</p> |

COMMENTS ON PREFERRED ALTERNATIVE

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| Commenters supported the preferred alternative including the increased range of services and facilities that would be available for day and overnight visitors. | Park managers look forward to working with stakeholders and the public to implement the preferred alternative. |
| Commenter suggested that cottages be rebuilt in their same location to avoid noise from early risers staying in the cottages that might awaken lodge guests. | The preferred alternative identified a new location for the cottages, closer to the new lodge and restaurant. Site planning and design will include consideration of siting these facilities to provide vegetative buffers and other considerations that will ensure compatible use. |
| Commenter asked that personal water craft (PWC) be allowed in the Park. | The PWC has not been allowed in the Park. Consideration of its use in the future is beyond the scope of this project. |
| Commenters discussed the importance of phasing implementation and fast tracking the rebuilding process because of concern that the high price to implement the plan will only increase the longer it is delayed. | Implementing this plan is a high priority for Park managers and will be an important focus once the plan is approved. The public will be kept informed of the status of implementation efforts and opportunities for their participation. |
| Commenters were uncertain of the benefits of project phasing as described in the preferred alternative and that the details of phasing should be done after additional financial analysis. | Park managers will have the opportunity after plan approval to seek additional information on the benefits of project phasing, if any, and the best approach for phasing elements of the preferred alternative to expedite visitor services while being responsive to the concessioner. |
| Commenter expressed concern for the timeframe for project implementation and that the south Florida community should focus on rebuilding Flamingo as quickly as possible. | Park managers are also concerned that the large cost of the project makes the timeframe for implementation uncertain. However, there are plans to phase in project components to allow services to resume as quickly as possible. |
| Commenters stated support for expediting the return of houseboats and providing electric hookups for RV sites in order to eliminate generator noise. | The Park anticipates houseboats returning to Flamingo later this year once the new five-year concessions contract is issued and is looking at options for installing electric hookups in the near future. |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>Commenters didn't want campground Loops B and C closed.</p> | <p>Based on careful analysis of many years of visitor use at Flamingo, much of the time large parts of the campground sat empty. As a result, the preferred alternative, which allows for flexibility during the implementation process, identifies an optimum number of campsites of 130. Should future use indicate this number is inadequate, there are options for Park managers to establish additional sites.</p> |
| <p>Commenters stated opposition to a private organization running the Park and having a concession run campground, feeling that this would raise costs (or no longer honoring of the Golden Age Pass) and detract from the national park experience, and that the change from NPS management to concession managed campground was not clearly described in the plan, that Park ranger presence help promote resource protection, provide information, handle emergencies, deal with behavioral problems, people illegally collecting specimens, making excessive noise.</p> | <p>Park managers believe that a campground operated by a concessioner can still address the concerns expressed in this comment that an NPS presence in the campground is important for the visitor experience. Park managers agree with this comment, and NPS rangers will still have an active role throughout Flamingo, including the campground. The park is committed to bringing in an excellent concessioner that will work cooperatively to provide a full range of visitor services, shared between park and concessioner staff. There are insights to be learned from other national parks where both NPS and concessioners operate facilities, and the Park will work to set up the best integrated approach to managing the campground.</p> |
| <p>Commenters indicated that the visitation levels anticipated at Flamingo that are described in the plan and in the financial analysis might be understated, and that therefore, the size of facilities and number of lodging units outlined in the preferred alternative are too low.</p> | <p>The visitation levels provided in the plan are the best current estimates of expected future use and are based on many factors, including careful analysis of past visitor use levels at Flamingo, in the park and south Florida; as well as anticipated tourism and eco-tourism trends in south Florida and statewide.</p> |
| <p>Commenters were concerned that the preferred alternative did less than Alternative C in consolidating the development footprint and reducing automotive use.</p> | <p>While there is less acreage restored in the preferred alternative, Park managers believe that the decisions that affect the restoration acreage figure – keeping Eco Pond open as a day use facility and maintaining RV camping at the T Loop – were based on sound reasoning and overwhelming public input that addressed the benefits of retaining Eco Pond and not moving RV camping near the lodge and cottage area.</p> |
| <p>Commenter questioned the benefits of restoring to natural conditions areas that are no longer going to be used for facilities.</p> | <p>Park managers and much of the public identified the restoration of previously impacted areas no longer needed for facilities or infrastructure as an important objective of the project.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
|---|--|
| <p>Commenter wondered about the practicality of a concessioner-operated fish cleaning service.</p> | <p>During site planning and design options for establishing concessioner fish cleaning services, whether at the current fish cleaning station or elsewhere will be determined.</p> |
| <p>Commenter wanted clarification of how porous paving would be integrated into parking areas.</p> | <p>New parking areas would be constructed of materials that are most sustainable and least impacting to wetland resources. For existing areas, during site planning and design the cost/benefit of maintaining existing surfaces as compared to installing new, less-impacting surfaces would be evaluated.</p> |
| <p>Commenters noted that certain facilities in the preferred alternative could have been described more clearly. Specific facilities mentioned were: food services/restaurants, shade areas, places to sit and look out on Florida Bay, meeting rooms, the current wastewater system.</p> | <p>There will be restaurants and food/beverage service at the lodge and marina areas offering sit-down and more casual service. The rebuilding process will give careful attention to creating common areas that provide visitors with basic comforts like shade or protection for mosquitoes through flexible screening of walkways and gathering areas. Meeting rooms that support programs for organized groups or volunteer organizations will be accommodated in the facilities proposed. The current wastewater system is state-of-the-art and about four years old.</p> |
| <p>Commenters noted the numerous possibilities of eco-tourism activities at Flamingo, such as biking, hiking, birding and canoeing. They also stressed the importance of low-impact tourism.</p> | <p>The preferred alternative includes a range of eco-friendly facilities and services that would offer a wide range of opportunities to enjoy and experience the park and its resources.</p> |
| <p>Commenters suggested leaving the plan flexible enough to allow experts in energy efficiency and alternative transportation to refine the site plan.</p> | <p>The plan does provide the flexibility to allow for more refined analysis of particular issues like energy efficiency and alternative transportation.</p> |
| <p>Commenters suggested the Snake Bight Tram not be included so that the hiking experience is enhanced.</p> | <p>The idea of bringing back the tram was a popular idea and so were enhanced hiking experiences. The details of the Snake Bight Tram have not been worked out yet, but would be determined in a manner that respected hikers' desires.</p> |
| <p>Commenter liked the plan but was concerned about the trend in recent years observed – that boaters are no longer avoiding the flats and shallow seagrass areas when running through Florida Bay.</p> | <p>This comment is more relevant to the GMP now underway, and will be considered in that plan. The GMP is looking at a wide range of strategies to better protect Florida Bay and its important resources, and that information should be out later in 2008.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
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| <p>Commenter indicated that the preferred alternative looked great, but relied entirely on outside capital, and wondered if anyone with a business perspective reviewed the plan, since it appeared to the commenter that the financial analysis did not offer a realistic assessment.</p> | <p>The project planning team included a firm with national and international expertise in tourism and eco-tourism. Their in-depth analysis in the context of the park's mission and Flamingo's role in the park (historically and its potential in the future) led to the analysis included in this document. Additional analysis will certainly be required as implementation efforts are pursued. The current analysis does provide important information on the financial feasibility of the preferred alternative. The NPS model for concessions normally relies on capital investment by the concessioner. This is not to say that a joint venture or partnership with public and private funding would not be appropriate or desirable. Other financing options to enhance the feasibility of the project will be considered after the plan is approved that is based on strong public interest to work with the Park on implementation.</p> |
| <p>Commenter did not support the inclusion of the swimming pool in the preferred alternative.</p> | <p>Based on strong public support (including the fact that multiple day Park visits to a hot, humid climate, and a swimming prohibition in the Florida Bay), park managers believe that a modest, eco-friendly swimming pool is an appropriate recreational activity to provide at Flamingo.</p> |
| <p>Commenters voiced support for providing space for organizations such as elder hostel and volunteer groups to meet, learn and support Park projects.</p> | <p>The preferred alternative provides opportunities for organizations and groups to have extended stays in the park for research and other projects supporting the park, and includes amenities such as meeting space, a range of lodging and food options. Additional long-term requirements will be considered in the GMP, now underway. This concept would extend visitation and use during peak- and shoulder-seasons, adding increased experiences in the Park and support for concessioner services.</p> |
| <p>Commenter suggested painting the visitor center building pink.</p> | <p>Pink was the original color of the visitor center and once funding is available it would be repainted its original color.</p> |
| <p>Commenter suggested that the park relax the rules for boat trailer parking until the plan is fully implemented. This would include allowing trailer tires to be parked on grass for short-term overnight parking and T Loop should allow non-RV campers that are trailering a boat.</p> | <p>This comment has merit and has been passed on to Park managers for consideration in the interim period.</p> |

| Substantive Public Comments (summarized as concern statements) | NPS Responses |
|---|---|
| <p>Commenters questioned the practicality of eco-tents given the climate at Flamingo.</p> | <p>Park managers believe that the role of eco-tents is well supported by the projected visitation levels and the peak demand for lodging during late Fall through winter and early spring.</p> |
| <p>Commenter suggested that A Loop of the campground not be referred to as exclusive for tent camping since “pop up” and van campers could use this area and do not all require electric hook ups.</p> | <p>Camping in A Loop is not restricted to tents only and is available for other types of campers not requiring electric hook ups.</p> |
| <p>Commenter wanted the Coastal Prairie Trail opened to bicycling.</p> | <p>The trail is within designated wilderness, where bicycling is not permitted.</p> |
| <p>Commenter supported chickees in Florida Bay but felt two would not be enough.</p> | <p>Additional chickees and backcountry opportunities, beyond the immediate Flamingo area, will be addressed in the GMP, now underway.</p> |
| <p>Commenters expressed the unique opportunity presented by this project to showcase the history and culture of South Florida, strengthen connections between the Park and neighboring gateway communities, provide high quality experiences, while protecting important resources.</p> | <p>Park managers and staff have heard this comment expressed by many over the last 3 years and views the rebuilding of Flamingo as important opportunity to address the critical issues described in this comment.</p> |
| <p>Response from the Florida State Historic Preservation Office (SHPO) regarding Section 106 consultation for this project (Appendix C).</p> | <p>On May 16, 2008, the SHPO concurred with the NPS’s determination that the project “will have no significant impact on historic resources” subject to the commitments and mitigation actions identified by the NPS.</p> |
| <p>Response from the U.S. Fish and Wildlife Service (USFWS) regarding Section 7 consultation for this project (Appendix C).</p> | <p>On May 21, 2008, the USFWS concurred with the National Park Service’s determination that finding that the project “may affect, but is unlikely to adversely affect” listed species found in the project area.</p> |
| <p>Response from the National Marine Fisheries Service (NMFS) regarding Section 7 consultation for this project (Appendix C).</p> | <p>On June 19, 2008, the NMFS identified the need for additional consultation on impacts to listed species as project implementation details are developed. The NPS is committed to working closely with NMFS to address all of their concerns during implementation planning and permitting.</p> |