



# ecoimpact inc.

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ECOIMPACT, INC. RESPONSE TO CRITICISMS BY  
THE NATIONAL PARK SERVICE OF THE REPORT  
"THE IMPACT OF EVICTING FARMERS FROM THE HOLE-IN-THE-DONUT"  
AND RELATED MATERIAL

## INTRODUCTION

The release of a report prepared by EcoImpact, Inc. for the South Florida Tomato and Vegetable Association on May 1, 1975 opened the then pending and now temporarily accomplished eviction of farmers from Everglades National Park's (ENP) Hole-in-the-Donut to public debate.<sup>1</sup> The ensuing pro and con argumentation over the complex legal, environmental and socio-economic issues continues to generate controversy.

The result has been strongly differing positions on many pertinent issues as reflected in several National Park Service (NPS) statements challenging the credibility of the EcoImpact report.<sup>2</sup> A document of similar intent, based largely on NPS input, has also been circulated by the Wilderness Society.<sup>3</sup>

The purpose of the present paper is to factually rebut NPS statements and allegations concerning the most significant issues in dispute. NPS assertions addressed herein have been quoted verbatim from the various public statements made by representatives of that Federal bureaucracy over the past two months.

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<sup>1</sup> The Impact of Evicting Farmers From Everglades National Park's Hole-in-the-Donut. EcoImpact, Inc., Gainesville, Florida. 1975.

<sup>2</sup> a. Everglades National Park Superintendent Stark statement before the Dade County Community Relations Board, May 9, 1975.  
b. Stark statement before the Dade County Commission, June 4, 1975.  
c. Everglades National Park Research Director Hendrix and Stark statements before the Florida Audubon Society Board, June 6, 1975.  
d. Everglades National Park Assistant Superintendent McClain statement before the Florida Cabinet, July 1, 1975.

<sup>3</sup> Wilderness Society position paper, Raye - Page, June, 1975.



In preparing this rebuttal, we have been distressed both by the quality and character of the NPS attack on our professional credibility, and by the necessity of having to respond in a manner sharply negative toward the NPS and those of its staff involved in the Donut dispute. We sincerely hope that at some point there will be a Congressional hearing, and perhaps even an investigation, to determine where the truth rests. Surely something yet again has gone wrong in our nation when an Executive agency like the National Park Service (U.S. Department of the Interior) can directly injure so many of Florida's citizens and successfully hide behind a contrived facade of "protecting the Everglades wilderness". We primarily and respectfully address this Rebuttal to the White House and the United States Congress with the request that "truth in government" be a universal criterion equally applicable to such white hat agencies as the National Park Service.

#### AGRICULTURAL CHEMICAL RESIDUE STUDY

NPS: "EcoImpact approached us some time in October about doing a one shot pesticide study to assess the effects of agriculture in the Hole-in-the-Donut upon the land surrounding the Hole-in-the-Donut."

EcoImpact: The study goal was to collect soil and biota samples from the Hole-in-the-Donut agricultural lands and adjacent natural system lands immediately north and south for subsequent analysis by the Institute of Food and Agricultural Sciences (IFAS) laboratories at the University of Florida and elsewhere of pesticide, mineral and heavy metal residue constituents. ENP staff have often expressed concern about farming impacts over the years, but, ENP never undertook research to confirm or refute those concerns, apparently because any feared impacts were too insignificant to warrant a higher priority in the allocation of a substantial annual research budget. NPS acknowledged before a meeting of the Florida Congressional Delegation that they had never researched the impact of farming operations in the Donut because they had other "higher" research priorities.

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NPS: "...the design of the experiment was a good one to begin with, but it wasn't perfect as it turned out because of difficulties in communications between ourselves and EcoImpact...."



EcoImpact: The overall objectives of the mutually agreed to sampling program were: 1) to help clarify the present impact of farming operations on surrounding ENP natural ecosystems; and 2) to provide insight into the importance of chemical residues from past farming activity to the well-being of ENP wildlands and wildlife. The residue study was adequate in that it fulfilled both of the above primary objectives and provided a data base from which honest and meaningful conclusions, interpretations, and recommendations were drawn.

The design, which NPS characterizes as "a good one", was closely followed and about 85 percent accomplished with only a few spider and insect conglomerate samples unobtained due to an insufficiency of biota to form an adequate sample volume. EcoImpact went to great lengths to achieve and maintain communications with NPS during the survey. In general, while we found "communications" with ENP were sometimes difficult, that did not significantly impair or diminish the survey's effectiveness.

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NPS: "Though we helped as much as we could, the sample was taken in a five day period and in the last week of October, first week of November."

EcoImpact: After an extensive period of mutual negotiations and sample design refinements, soil and biota samples were collected by EcoImpact and ENP staff during the 13 day period from October 21 to November 2, 1974. Some 230 man-hours were spent in field collection and laboratory storage preparation of the collected materials. About 90 individual samples were sent to the laboratories for analysis of some 25 parameters. A conservative estimate of the actual cost of laboratory analyses exceeds \$50,000. Laboratory analyses required more than four months of bench time. At least 10 man-days went into the interpretation and analysis of results. Some 13 scientists with substantial experience in agricultural chemical residues reviewed and commented on the report in its preliminary draft form. All comments were used in the final rewrite.

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NPS: "This is not a good basis for the way to sample effects of agriculture...." (referring in general to the EcoImpact residue survey).

EcoImpact: The NPS, in three decades as ENP custodians, never generated any quantitative data on the actual effects of Donut farming which they feared was a potential hazard to ENP. Certainly, the growers have gone farther in attempting to assess farming's possible damage to ENP's ecology, although NPS has a mandated obligation to protect and properly manage the Park. Our data, when coupled with the Park's own Ogden, et. al.<sup>1</sup> study of toxic chemical residues, give ENP the necessary base to plan future monitoring programs, identify additional data needs, assess true and probable hazards, and lay some unfounded fears to rest.

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#### AGRICULTURAL CHEMICAL RESIDUES

NPS: "There is about 12,960% more DDT in Donut soils than there are in soils sampled north of the farmland. Similarly there is a concentration of 1,780% of DDT in the natural soils south of the Donut land."

EcoImpact: The above is one of many quotes whereby the original laboratory residue data are converted by NPS to parts per billion and nonsense percentages used to support an ENP interpretation. In fact, all pesticide residues, from all samples, from all locations were surprisingly low and proved conclusively that no significant problem was now posed by the DDT-family of chemicals whose use by Donut farmers is now prohibited.

The NPS has sought to mislead the public by creating percentage and parts per billion (PPB) statistics for comparison of farmed versus unfarmed land in their attempt to rebut EcoImpact's interpretation of no significant adverse agri-chemical impact. Utilization of spectacular percentage statistics and parts per billion computations is a scientifically unorthodox method of interpreting residue levels. There is

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<sup>1</sup> Ogden, J. C., W. B. Robertson, G. E. Davis, and T. W. Schmidt. 1974. Pesticides, Polychlorinated Biphenols, and Heavy Metals in Upper Food Chain Levels, Everglades National Park and Vicinity. Final Report. South Florida Ecological Study.



no scientific basis for contending that the pesticide residues measured in our survey are sufficient to pose either an acute or chronic problem for Everglades biota.

Furthermore, the NPS computation of percentages frequently incorporates arithmetical errors, sometimes higher and sometimes lower, than the correct value. Nonetheless, the use of percentages in this instance is totally misleading since the real residue values are unusually low ambient readings and indicate no problem as a practical assessment of actual adverse impact.

The Department of Interior's<sup>1</sup> acute toxicity values for selected wildlife and laboratory animal species clearly reveal that Donut biota residue levels are infinitesimal when compared with quantified lethal dosages (LD<sub>50</sub>).

Ogden, et. al. (1974) commented in their ENP toxic chemical residue study:

"These data revealed that DDT, DDE, DDD, Dieldrin, and PCBs appear to exist in concentrations well below amounts known to have either acute or chronic effects on local species."

and,

"Scattered samples of South Florida sediments, plants, water, vertebrate tissue, and avian eggs, which have previously been analyzed for various environmental pollutants have generally contained quite low concentrations of these poisons, as one would expect from the successful vertebrate reproduction observed."

We find it significant that the NPS has not once made reference to their own research report and the above quoted findings during the current Donut controversy. Are they ignoring their own scientific research because it fails to support their political position?

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<sup>1</sup> Tucker, Richard K. and D. G. Crabtree. Handbook of toxicity of pesticides to wildlife. Bureau of Sport Fisheries and Wildlife. Government Printing Office, Washington, D. C. pp. 131.



NPS: "These are high levels of concentration.... This study works against the farmers, we feel, because it does show tremendous amounts of concentrations built up in the whole area."

EcoImpact: The study shows just the reverse; that the actual accumulation of agricultural chemical residues has been slight in the Donut as well as in the adjacent areas sampled to the North and South. We do not dispute that the relative concentration is greatest in the Donut, nor that the control samples to the South usually have higher values than the controls to the North. We do hold that all pesticide residue values are low and do not now pose a threat to the natural ecosystem. Furthermore, the study design is inadequate for sustaining the types of hypothetical and statistical extrapolations made by NPS analysts which exceed the objectives of the study. A multiplicity of factors other than farming (i.e. soil type, hydrology, wind, other weather, biota, ambient residue loading, etc.) must be incorporated in any meaningful comparisons of residue concentrations between the Donut and the controls to the North and South.

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NPS: "It seems clear to us that continued farming. . . will result in further degradation of fragile wilderness and wildlife. By the time all of the causes and effects of continued farming on the park are known, the park's natural ecosystem in this area may be irretrievably damaged."

EcoImpact: These statements are typical of NPS propaganda used in their Donut argumentation. Aside from the obvious changes when wildlands were transformed into farm fields, there has been no demonstratable degradation of the Everglades wilderness and wildlife attributed to Donut farming. Therefore, it is deliberately misleading people to suggest that more farming will further degrade these values.

While some might characterize wilderness as "fragile", this is clearly a value judgment and a case could be made that wilderness systems often are most resilient.

The natural ecosystem on the Donut farming lands has long since been physically altered by the cultural use of the land, perhaps irretrievably. As for the adjacent wilderness, there are no known



off-site adverse effects from farming that can't be controlled when identified before irretrievable damage to wilderness values ensues. This is an utterly fallacious concern without factual merit.

Furthermore, ENP Superintendent Jack Stark has told both Dr. George Cornwell and Mr. Jack Campbell in separate conversations that: "we don't really think farming in the Donut has hurt the Park all that much," and "we've lived for a long time with Donut farming and it hasn't seemed to have done much harm."

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#### HISTORICAL CLAIM OF RIGHT TO FARM

NPS:

"We believe that the historical claim to the right to farm in the Hole-in-the-Donut has been overstated in the report. There may well have been some agriculture in the general Donut area every winter for the past 60 years or so, but in many years acreage farmed was certainly very small. The big expansion occurred after the early 1950's with the advent of rock-plowing and overhead irrigation. In other words, the Donut only became an important agricultural area some years after the Park was established."

EcoImpact:

Agricultural activity in the Donut has occurred virtually every year since 1916, or about three decades prior to the formal dedication of Everglades National Park. The relative extent of acreage is unrelated to farming being an historic use of Donut lands for 60 consecutive years.

The statement that Donut agriculture has only been important since the 1950's is totally false and conveniently overlooks the fact that the area originally became farmland in 1916 at the invitation of the Florida Federation of Women's Clubs. This organization played a major role in establishing Royal Palm State Park, Florida's first, at Paradise Key. They hoped to make the new park self-supporting, in part, by renting land in the Donut to farmers, thus beginning the area's long agricultural history. Further, according to the accounts of such Donut farming families as the Iori's, as many as 7,000 plus acres of glades farming occurred in the Donut before the rock plowing of the '50's.

No attempt has been made in the report to disclaim the increased agricultural importance of the Donut with technological advances.



Indeed, technology changes in the '70's account for much of the now almost guaranteed annual high yield of tomatoes from a relatively small acreage farmed. Long-term, continuous farming of the Donut is an established historical fact. Farmers have not invaded ENP and converted public wilderness into a special-interest, commercial land-use. Instead, ENP surrounded, wrongfully acquired, and removed these lands from their agricultural use; in so doing, they violated their documented, good faith agreements with the farmers and the State of Florida. Perhaps, even more disturbing, they falsely lobbied and misinformed Congress in 1970 to amend the 1958 Everglades National Park Boundary Act and eliminate protection of Donut farming.

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#### THE PRECEDENT ISSUE

NPS: "Historical precedent is important in this case. We do believe that the history of acquiring inholdings in National Parks and the fact that the Congress has directed us to acquire inholdings is important and we think the precedent is important, the one that would be established by allowing commercial use on lands we have acquired for Park purposes. Allowing this action to proceed could open up all our national parks to various adverse uses."

EcoImpact: Nonsense! By any assessment, the complex situation in the Hole-in-the-Donut is unique, and the grower's current attempt to maintain agricultural leases defies characterization as "just another special interest group lobbying to obtain commercial use of our national park lands."

While the NPS files may contain numerous requests for grazing, lumbering, mining, etc., it is extremely doubtful that a case exists where the commercial use in question preceeds establishment of the park, has been an on-going yearly land-use throughout the history of the park, and whose existence within the park was mandated by the host state, agreed to by the NPS and subsequently protected in perpetuity by Act of Congress for as long as this land-use was actively maintained.

Any objective reviewer of the pertinent facts would agree that legislation enacted to allow a continuation of regulated farming



activity in the Donut could easily exclude any future special interest challenge from elsewhere requesting conversion of other national park lands to commercial use.

The notion that the granting of lease continuations in this special case automatically opens up all of our national parks to various adverse uses is specious. Mechanisms exist for a mutually satisfactory resolution of this unique situation in Everglades National Park without extending a hazardous precedent to other national parks.

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#### RESTORATION CAPABILITY

NPS: "It has been stated that we do not have the money, equipment or technical ability to restore abandoned farmlands in the Donut. Everglades National Park started a research program in 1972 to find out what management techniques can be used to reestablish native plant species in the Hole-in-the-Donut. Our program will be expanded to \$100,000 (from \$5,000 in 1972 and \$25,000 in 1975) after July 1, 1975."

EcoImpact: It is gratifying that ENP's restoration program for the Donut has recently been significantly upgraded in terms of its diversity of approach and funding. Ironically, the national attention focused on the area by the grower's attempt to retain their farming leases has apparently played a major role in this improvement in the restoration budget.

Statements in our report reflecting concern about the ENP program were based on an honest evaluation of the information presented by park management staff at the time of report generation. This input included: 1) a restoration philosophy dominated by the desire to create an historically disproportionate acreage in pineland, using seed stock from the northern sub-species of slash pine which is ecologically and genetically unsuited to establishment in ENP; 2) no plans to establish wetland communities; and 3) the idea that creation of tropical hardwood hammocks was unfeasible.

These, and other inadequacies in the NPS program upon which EcoImpact's opinions were based, led to the conclusion that the farmers could effectively employ their growing expertise, equipment,



off-time labor pool and money (guaranteed at \$100,000 per year, minimum) in helping to restore the natural vegetation removed by their own land clearing activities. This approach would be coupled with an imaginative rehabilitation master-plan designed by an array of expert Everglades ecologists under the authority and approval of the NPS. Such a program would have the added advantage of relieving the taxpayer from bearing the burden of Donut rehabilitation and would release valuable NPS funds for use elsewhere. ENP, seemingly intent on destroying any positive relationship it might have enjoyed in its "home town", has been adamantly opposed to community participation in the restoration program. They contend such work is a NPS responsibility and mission. To us, Park and community working "together" on such a project has great promise and could only benefit ENP. If farming should continue on 5,000 acres, there still remains a major restoration mission for another 6,000-7,000 acres. We would urge NPS to re-think this "go it alone" decision and seek community involvement in the restoration project.

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#### DONUT AGRICULTURAL AND ECONOMIC POTENTIAL

NPS: "We believe that the agricultural potential of the lands presently farmed in the Hole-in-the-Donut appears to be exaggerated in the report if viewed on any long-term historical record. In fact, there have been a number of crop failures. These can be attributed to high water levels on the low-lying lands, frost damage, unsatisfactory market values and other causes."

EcoImpact: Throughout the Donut's 60 year farming history, periodic poor harvests undoubtedly occurred, just as bad years are an accepted part of any area's farming history over a period of six decades. Agriculture is inherently a high-risk business with most of the variables uncontrollable by individual growers. Long-term Donut farmers, such as the Iori's, indicate they never had a total crop failure in their Donut fields.

It is the present agricultural and economic worth of the Donut farmlands that must be weighed in the current controversy. Past



yields and methodologies are now merely of historical interest. A meaningful assessment of agricultural potential, in light of today's technological and genetic advances, can only be based upon present production figures, farming practices and market values, of which the 1975 data are representative.

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NPS: "We also believe that the economic consequences of elimination of farming have been overstated. The removal of 3,500 acres from agriculture should not cause the demise of the agricultural industry in South Dade County."

EcoImpact: According to Dade County Agricultural Extension figures for the past season, farming revenue from the Hole-in-the-Donut represented nearly 20 percent of the total income from all Dade County agriculture. While approximately one-third of the county's tomato acreage was planted in the Donut in 1975, fully one-half of Dade's \$50 million total tomato revenue was realized from this land. Over \$25 million in crop value was grown on less than 4,000 acres of land - phenomenal production by any standard. By applying a standard community multiplier, the economic worth of Donut agriculture to Dade County and Florida is conservatively estimated as a substantial \$75 million.

The Donut's high yields are harvested from mid-March through April when few other field-grown tomatoes are produced in Florida or in the U. S., making the Donut crop crucial to the consumer's market basket, as well as to migrant farm workers and local businesses who can look only to this area for work opportunities and economic activity in late spring. Growing conditions in the Donut consistently make its crops qualitatively superior and therefore more in demand by national buyers at higher unit prices.

While we at no time have forecast the demise of agriculture in Dade County as a direct consequence of Donut closure, we and many other agricultural experts believe for many reasons that the tomato industry in Dade County and all of South Florida is jeopardized in a type of domino effect by the loss of the Donut's production. NPS and ENP staff seem unable to grasp the reality that Donut tomato land is



a unique agricultural system that cannot be replaced in time of yield or productivity by other lands in Dade County or the United States. Taking away the Donut strikes at the heart of the South Florida tomato industry, rather than merely inflicting a temporary and minor wound as suggested by NPS.

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#### THE MIGRANT WORKER ISSUE

NPS: "The EcoImpact report states that this farming period provides 4 to 6 weeks employment to an estimated 3,500 workers, and that \$1,200,000 was paid to the farm workers (during the 1973-74 season). Using the figures furnished in the report, and the industry accepted percentage paid to farm labor contractors, a few simple mathematical computations will show the gross weekly earnings of each farm worker to be less than \$40 per week. If these workers were employed full time, as one is led to believe, the result would appear to be a flagrant violation of the Fair Labor Standards Act."

"According to sources associated directly with the farm labor market, the number of migrant farm workers more realistically number from 600 to 800 on peak days. The number of jobs in the report is overstated from 200 to 400%."

EcoImpact: The information contained in the first sentence is a matter of record available to NPS if they had taken the trouble to contact the 15 growers who farmed the Donut in 1974-75. Actually, the number of migrant workers employed during the 1975 Donut harvest was understated in our desire to be conservative in estimating this highly important socio-economic statistic whose human dimensions seem to have escaped the NPS. The following table reflects the Donut work force used in the March-April, 1975 harvest:

<u>Grower</u>	<u>No. of Paid Employees</u>
Joe Torcise	790
Strano Brothers	564 (field)
	292 (packing house)
Florida Tomato Packers	486 (packing house)
Ralph Iori	482
Frank Sapp Farms	400
Fred Cannington	398
Litton Farms	368
F.H. Rutzke & Sons	360
Total employees	4,140



The above total of 4,140 employees excludes several hundred who worked less than a day. Temporary employees and permanent annual employees working on the Donut crop at pre-harvest times other than March and April are not listed in this total. It also does not include the employees of one major grower and the six lesser growers. The true total would exceed 5,000. The above statistics are based on actual payroll records maintained to meet state and federal requirements. They are open to inspection by the NPS.

The misleading conclusions reached by NPS on the employment question reflects their inadequate understanding and research of migrant worker work schedules, crew shifts, staggered exodus to northern work opportunities and varied methods of handling workers and their remuneration by the individual growers and packing houses. NPS's cavalier treatment of the migrant issue reflects an abysmal lack of social conscience.

NPS's charge of violating the Fair Labor Standards Act is as ridiculous as converting worker income to a weekly earning basis. Migrant workers are paid by the boxes picked, usually on a daily basis. One would hope that a public agency would be better informed before assuming such a destructively critical posture.

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#### HYDROLOGICAL INTERPRETATION

NPS: "We suggest that the Cornwell (EcoImpact, Inc.) report and other statements err hydrologically in viewing the Donut lands as a drainage that is somehow self-contained."

EcoImpact: Hydrological data specific to the Donut is sparse, but adequate extrapolations can be made from U. S. Geological Survey and other research reports. Biscayne Aquifer structural contours for the Homestead and Donut region are consistent with our interpretation in the vicinity of the Donut of unconsolidated and somewhat centrifugal surface drainage patterns. This pattern has been characterized in numerous Everglades historic drainage diagrams as bypassing the



Donut and resulting in a semi-isolated, internally-directed drainage. U.S.G.S. Everglades' hydrologists have referred in technical reports to the "normal" water movement in the South Everglades being up and down in response to rainfall and evapo-transpiration, rather than north to south as surface flow.

The southward movement of water in Taylor Slough is about a mile east of the Donut, while the Shark River Slough is well to the west. Any occasional surficial water flow from the Donut farmland southeast into Taylor Slough, and thence to Florida Bay, is largely abated by the continuous natural and cultural barriers imposed by Royal Palm Hammock, marsh vegetation, the elevated grade of the Old Ingraham Highway and the major borrow canal paralleling this road to the south and east. Also, a canal and its dike form a portion of the southern boundary of the agricultural lands, impeding potential surface flow southward out of the Donut.

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NPS: "We feel very certain that water moves across the Hole-in-the-Donut."

EcoImpact: Rarely, during wet season periods of excessive rainfall, this phenomenon may occur, but the hammock and highway form a continuous eastern barrier to off-site flow under all but exceptional circumstances. We doubt that water flows across the Old Ingraham Highway with any greater frequency than once in ten years, and probably much longer an interval. None of the people we interviewed who have lived in the area for most of their lives could recall seeing water flowing over the Donut since the construction of C-111. The borrow canals along the Donut's south and southeastern periphery act to some extent as holding and spreader impoundments by capturing surface flow, if any, leaving the farmland. Further, the regional drainage effect caused by the interception of "upstream" water by Canals 111, 102 and 103, coupled with the recent history of persistent South Florida drought, has led to somewhat lowered aquifer levels that require greater one-time storm rainfall to achieve the occasional off-site surface flow



conditions noted in the past. In short, we do not see overland flow across the Donut as a significant factor in distributing agricultural chemicals from the point of application to adjacent natural systems.

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NPS: "We see additional hydrological error in the failure to mention the fact that flooding during the farming season has often interfered seriously with Donut farming."

EcoImpact: The South Florida rainy season occurs from late May through October, as does the hurricane season. Site preparation for Donut farming begins in mid-October, after which crops are planted in December and January, and harvested from mid-March through the first week in May. Thus, farming in the Donut is essentially a "dry season" land-use. While an early rainy season occasionally may have had an adverse influence on crop production, no farmland in the country is completely free from the hazard of crop loss due to flooding, as the past several years in the mid-West have demonstrated. Excess rainfall is one of the many risks that challenge virtually all farmers each season. It has not been a serious problem for Donut farmers in the past years.

The present technology and variety of tomato plant utilized in the Donut also play a significant role in mitigating potential excessive rainfall impact. Genetic research has produced the Walter tomato plant adapted to superior growth and yield when grown in semi-wetland conditions. These "swamp tomatoes" are planted in mounded and mulched rows which afford further flood protection. Any assessment of potential water stress and its probable impact on Donut production must be viewed in terms of on-going improvements in farming methodology rather than the past historical record.

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#### ALTERNATE SUITABLE FARMLAND

NPS: "For the last 15 years in Dade County there has been an average of 45,000 acres in vegetable production. There are 100,000 (total) acres available for farming. So we say there is land available outside (the Park)."



EcoImpact: Growers and objective reviewers recognize the economic reality of Donut farming termination -- that duplicating the Donut harvest dollar value on any farmland elsewhere in the county will require at least twice the acreage with a proportionate increase in capital and labor expenditures. Even so, this effort would not secure the near certain, quality tomato crop in March and April.

A majority of Dade County's presently unfarmed land available to agriculture has been selected against because it is inferior to land presently in production. This situation inevitably forces growers evicted from the region's best tomato land to accept the worst. Their alternative, and perhaps the one of choice to many, is to get out of the food growing business altogether. Furthermore, these alleged "alternate suitable farmlands" cannot produce crops during mid-spring, a crucial production niche capable of being filled only by the Donut. Growers and consumers both will take an unnecessary economic battering from the senseless decision to oust Donut agriculture.

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#### THE TAYLOR SLOUGH LAND-CLEARING ISSUE

NPS: "Our view is that agricultural development (in the upper Taylor Slough drainage immediately outside the Park) will proceed, with or without the Donut, provided that it is permitted and proves to be economic."

EcoImpact: Although this opinion is perhaps valid, land-clearing in this high-impact and marginal farming area was unquestionably initiated this particular spring because of the impending termination of Donut agricultural production after the 1975 season. Realizing that output and favorable site conditions in the Donut are unsurpassed in the county for tomato production, some growers recently made the decision to lease private, unfarmed land adjacent to the Park in hopes of approximating Donut growing conditions and capitalizing on the probable 1976 market void. These farmers are taking a major gamble in that water and weather conditions are far less favorable than in the Donut.

Farmers who initiated land-clearing activities in Taylor Slough in the Spring of 1975 voluntarily ceased plowing further new land that



season in compliance with a restraint request by their representatives seeking a renewal of Donut farming leases. This was achieved with an understanding that all was not yet lost and that future leases in the Donut might still be obtained if an accommodation with the NPS, Congress, or the White House could be reached before October, 1975.

Individual Dade County tomato growers and packers oversee and manage their farming operations independently. They operate in a highly competitive business climate and must make decisions relative to the up-coming season well in advance based on prospective market conditions. The land clearing was initiated by several growers, all but one of whom was evicted from the Donut by the new Landlord, the NPS. The halt in clearing Taylor Slough was motivated by the possibility of tomato growers obtaining future leases on a competitive basis if a favorable settlement could be reached. The halt reflects a spirit of mutual cooperation among the growers who hope to eliminate public cynicism about their motives and achieve a solution beneficial to all.

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Wilderness Society and NPS Comment: "Miami citizen sources believe the 200-acre scarification was instigated by the tomato growers for blackmail purposes."

EcoImpact: This charge is absolutely without a factual basis. The farmer involved in the 200 acre rock plowing of Context Realty lands is from Perrine and never farmed in the Donut. His only connection with the Donut is that he lost his lease to a displaced Donut farmer and therefore had to look for "new" land to stay in business. He entered into a long-term lease that calls for the preparation of additional hundreds of acres in each of several successive years. This is reality. The land preparation costs are so great that no individual or group would consider it economically sound to clear land for some obscure kind of "blackmail".

The above accusation does reflect the ridiculous lengths to which adversaries sometimes will reach to win a point, often to the detriment of their own credibility.

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## A FINAL REBUTTAL

NPS: "Now, I should like to direct your attention to the report prepared by EcoImpact, Inc. We believe this study was designed with one objective in mind, to support a pre-conceived conclusion that farming should continue. It is apparent that little regard was given to accuracy and reliability of field methodology. Moreover, the data in the report does not support the conclusions. This report concedes that the study raised as many questions as it provided answers. Few of these questions were ever identified."

EcoImpact: The NPS opinion that the EcoImpact study "was designed with one objective in mind, to support a pre-conceived conclusion that farming should continue" is at best subjective and professionally slanderous. Conversely, Secretary Russell's 1970 statements to Congress were clearly presented to support pre-conceived and demonstrably unfounded NPS conclusions about the feared impact of farming with the single objective of forcing the ouster of Donut farmers! An objective NPS analysis of the EcoImpact report in total might uncover a good bit of factual information and concepts useful to future ENP administrations.

We believe, after extensive review and introspection, that the data base and philosophical rationale for continued farming of the Donut do indeed support our report's conclusions. We have benefited from several months more time and a great deal of additional input since authoring the controversial impact report. We would not hesitate now to correct significant errors or retract conclusions if the experience and knowledge gained since publication justified such changes. We have worked as much on the Donut issue since generating the report as we did in its preparation and have found our original major judgments and conclusions to be reinforced during the interim.

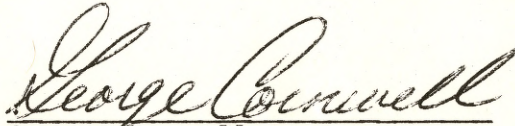
The NPS statement that "this report raised as many questions as it provided answers" is grossly taken out of context. The quote refers to certain aspects of the chemical and heavy metal residue study, only one facet of the material dealt with in the full report. The complete quote (from p. 128) was:

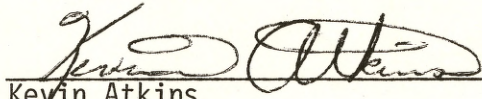
"Like all one-time, spot chemical residue sampling studies, this one poses as many questions as answers. Surely, it points toward a need for a regular and continuous program to monitor the distribution and quantity of toxic chemicals in the South Florida environment."



Then, the more important questions are identified immediately following the above quote in the second half of the introductory paragraph of the chemical residue survey conclusions section.

While this is at first blush a minor point, it reveals fully the unprofessional and to us inexcusable methods used by NPS and ENP staff to publicly discredit the substance of a constructive ecological study commissioned at considerable expense by a South Florida farming community. When the NPS made the above statement to the Florida Governor and Cabinet sitting in a public session, the NPS by shadow and innuendo discredited both EcoImpact and our clients by intentionally and deceitfully clouding the effectiveness of an objective and factual treatment of a complex and difficult land-use decision. There is nothing in our report, our methods, our relationship with our clients, or the ethics of our clients and ourselves, that justifies the pernicious tactics employed by the NPS and ENP. We believe in this instance they have discredited themselves, blemished the Executive Branch, and further accentuated the destructive potential of bureaucratic power misapplied under the guise of "public service".

  
George Cornwell  
President

  
Kevin Atkins  
Field Ecologist