Everglades National Park’s Historical Impact on Native Americans in South Florida

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Abstract

This research examines the consequences of Everglades National Park’s establishment on the Seminole and Miccosukee Nations. Guiding questions used are: How did Seminole rights change following the park’s establishment? How did the park’s establishment influence Florida economy and tourism during this period? My research argues that as a result of establishing Everglades National Park, Miccosukee and Seminole citizens experienced changes to land use rights that affected their legal sovereignty and economic opportunities in South Florida. Using federal and state government analyses, legal rulings, and newspaper articles I assert that both nations’ sovereignty was affected. Environmental history is well saturated with ecological histories of the Everglades and human histories of parks like Yellowstone and Yosemite. This research asserts the much-needed human emphasis of the Everglades that is often missing in the literature of the park and highlights the effects of past rulings and decisions that still deeply impact Miccosukee and Seminole economics, rights, and boundaries today.

Keywords: Everglades, National Park Service, Seminole, Miccosukee, land rights, tourism, sovereignty

In 1938, J. J. Cameron circulated a memo titled, “The Seminole Problem,” to the Everglades National Park staff. In this memo, he collected various letters debating Seminole removal from the swampland south of US 41 that had been set aside for the park by an act of Congress in 1934. In this memo, J.E. Scott, the superintendent of the Seminole Agency wrote:

“The Seminole of Florida has been pushed about from place to place for the past century and if he is to be pushed again into this forbidding wilderness with his hunting grounds greatly reduced, I only have to say that their predicament is going to be most serious.”

Scott’s statement indicates that there were clear doubts and warnings regarding federal policies affecting Native Americans in Florida in the twentieth century. Despite these warnings, Everglades National Park continued to develop, and as a result, its establishment had long term effects on the Seminole and

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Miccosukee communities in South Florida.

Everglades National Park is most well-known for its diverse species and subtropical climate. Congress established the Park in 1934 and it was subsequently opened to the public in 1947. Rarely discussed, however, is the human history intertwined with Everglades National Park. In 1915, the construction of the Dixie Highway, the first interstate highway in the United States, was completed, connecting east Florida to the Northern United States. Simultaneously, Tamiami Trail construction began, connecting Florida’s west coast to Miami and attracting many tourists and newcomers to the south.\(^2\) Concurrently, Florida real estate experienced its first land boom due to widespread publicity campaigns. Speculation of the wetlands was prolific, as marketing teams promoted the Florida subtropical environment as an oasis to northerners searching to escape brutal winters.\(^3\) Upon arrival, newcomers found the wetlands uninhabitable and unsuitable for farming. These homesteaders were not the only residents experiencing hardship. In the land boom, speculators fraudulently sold tracts of the Everglades where Seminole people had resided since the Second Seminole War.\(^4\) This paper highlights the effects of past court rulings and decisions that still profoundly impact Miccosukee and Seminole legal sovereignty, land use rights, and economics today.\(^5\)

In reviewing the literature on national parks, including Everglades, historians typically take one of three historiographical perspectives: the benefits, the negative aspects, and the economics of national parks. Historian Alfreed Runte wrote extensively on how the parks helped elevate the United States to near equals with European nations and their cultural monuments. As the first cultural history on the parks, Runte's work is essential to national park historiography. In his book *National Parks: the American Experience*, Runte argues that the National Park Service's establishment responded to the United States' cultural insecurity or lack of culture. He states that America's last hope to fill the cultural void was westward expansion and leverage of natural secondary sources from the early to mid-20\(^{th}\) century, Miccosukee is spelled "Mikasuki," referring to the language group rather than the cultural group and sovereign nation. In this paper, Miccosukee will be used here forward as it is the current spelling for the Federally Recognized Tribe. See "History," Miccosukee Tribe, (September 11, 2020): https://tribe.miccosukee.com/.

It is important to note that Native American sovereignty as used in this paper addresses the ability and authority of a nation, in this case the Seminole Nation of Florida and Miccosukee Tribe of Indians, to govern itself. There is an extensive history of the United States Federal government infringing on Native American sovereignty.

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\(^4\) For clarification purposes, until 1962, the Seminole and Miccosukee tribes were recognized as one tribe under the name "Seminole" by the United States Federal Government. However, they are distinct Nations, as the Miccosukee descended linguistically from the Lower Creek and Seminole from the Upper Creek language. Often in primary and secondary sources from the early to mid-20\(^{th}\) century, Miccosukee is spelled "Mikasuki," referring to the language group rather than the cultural group and sovereign nation. In this paper, Miccosukee will be used here forward as it is the current spelling for the Federally Recognized Tribe. See "History," Miccosukee Tribe, (September 11, 2020): https://tribe.miccosukee.com/.

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Similarly, Richard Grusin, in his book titled *Culture, Technology, and the Creation of America's National Parks*, argues that within the United States, nature is viewed as art and utilized for the purpose of recreation. Simultaneous to the establishment of the parks taking place, Grusin emphasized that the resulting rise in photography faced its own scrutiny as an art form. Also in agreement, historian Richard Sellars wrote, "the Park Service truly can claim leadership in the field of recreational tourism – the development and management of parks for public use, enjoyment, and education." A clear consensus among these historians is that national parks benefit American culture and society.

Those writing about the National Park Service’s negative aspects find fault with the historical narrative portrayed by park creators who argue that the parks exist within an undisturbed wilderness. Mark David Spence’s *Dispossessing the Wilderness: Indian Removal, National Parks and the Preservationist Ideal* argues that uninhabited wilderness had to be created before it could be preserved. In other words, the uninhabited wilderness did not exist, contrary to what park literature leads patrons to believe. A significant point of contention is the extent to which the parks' creators knew their effect on Native American populations. Historians Robert H. Keller and Michael F. Turek refute the administrative belief that Native Americans were not affected and did not use the Yellowstone region, which Spence accepts. Keller and Turek wrote, "prior human occupation left evidence of ancient campsites … and a trail system (which modern park highways follow) that dated back at least seventy-five hundred years." Since a modern highway follows these trails, illustrating human inhabitance, administrators clearly knew much more about the park’s prior use than they admit. The conflict throughout this school of thought is that Native American groups experienced further disenfranchisement due to National Park establishments, and the coordinating literature does not recognize this history. Although William Cronon’s *Changes in the Land: Indians, Colonists, and the Ecology of New England* speaks explicitly about colonial England, long predating the National Park Service, his arguments are soundly reflected in their historiography. Cronon also argues that a pristine or golden age of nature never existed. Instead, he states that Native

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Americans and colonists both imposed changes to the land to benefit their lives, although each group utilized distinct methods. Cronon concludes that the most significant shift in land use was the European shift to a globalized capitalistic society compared to Native American consumption of resources, which focused on subsistence or regional trade.

Aside from addressing the National Park Service's consequences, many authors have also written about its economic impact. To most who research the National Park Service, the program itself appears to be a long string of poor economic decisions. In his article, “Market Failures and the Rationale for National Parks,” economist Robert Turner writes that the economics behind public parks does not support their existence. Turner states that the National Park Service provides a public good that private companies could provide more efficiently. However, several economists recognize that value is not purely quantitative. The economic values of family time, culture, and identity are inherent within the parks. Unlike Turner, authors David Harmon and Allen Putney name the intangible values found within a public park, such as spiritual and educational values. This paper asserts the much-needed analysis of human history in the Everglades that is often missing in scholarship on the National Park Service by analyzing the effects of past court rulings and decisions that significantly impacted Miccosukee and Seminole Nations and continue to today.

As one of the earliest advocates for Everglades preservation, Minnie Moore-Wilson, wrote significantly on the environment’s protection, the Seminole of Florida, and their use of the Everglades. Moore-Wilson stated in a letter to the Florida Legislature that, "One hundred-thousand acres may seem at first glance, like a large tract for 600 Indians, but when it is considered that at least four-fifths of that land would be most of the time underwater, very little is left for homemaking.” Her insights cemented that while Seminoles did have land rights in the late nineteenth century in south Florida, it certainly was not desirable land, further establishing these land right issues as innately Floridian. While Moore-Wilson wrote to protect Seminole land, speculators moved to Florida to purchase farmland after hearing promises to drain the swampy environment by redirecting Lake Okeechobee overflow using human-made canals.

By the twentieth century, rates of tourism, emigration, and destruction of Florida wetlands from the economic boom grew rapidly. Consequently, Marjory Stoneman Douglas became a well-known advocate of protecting the Everglades ecosystem. A historian cannot write about the Everglades without discussing Stoneman Douglas or her book, *The Everglades: River of Grass*, which was published in the same

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year as the Park’s opening in 1947. In her closing chapter, Stoneman Douglas opens with the memorable statement, “The Everglades were dying,” in her assessment, at the hands of Floridian tourism and settlement. In the final chapter, she blamed the quick pop-up of the City of Miami and the land boom for the devastating consequences she saw in the Everglades landscape. Douglas wrote about a wave of land piracy, where over 200 private owners claimed "600,000 nearly worthless acres" of land. She explained that the federal government worked to procure these worthless acres and turn them into the national park, thus fulfilling her goal of protecting the unique environment.

To discuss such a large institution as the National Park Service and its history, historians must investigate the events leading to its establishment in 1934. The distinct boundary between the United States and Spanish Florida following the American Revolution provided a haven for escaped enslaved people and more land for opportunistic white Americans. The Seminoles were at war in some form or another with the United States from 1812 to 1858. In 1818, the First Seminole War was a series of skirmishes between Americans and Seminoles led by Andrew Jackson to recapture runaway enslaved people. The Second Seminole War resulted from the United States' attempt to remove Seminoles west to Indian Territory, in contemporary Oklahoma, following the passage of the 1830 Indian Removal Act. In 1832, fifteen Seminole Leaders signed a contract with the Federal Government regarding potential territory in Oklahoma, believing the contract to be binding only if the Seminole Nation in its entirety agreed to removal. American negotiators; however, deemed the contract final upon signing. A significant number of Seminole citizens disagreed with the terms of the negotiation and ultimately refused to remove. In response, the US Army was sent to Florida to enforce the contract leading to a brutal seven-year war. Being outnumbered and with several significant leaders captured, an estimated 3,000 Seminoles were removed by the Army to Oklahoma Territory. A minority of about 500, however, fled to the Everglades in South Florida. As increasing numbers of white Americans moved to South Florida, encroaching on Seminole Land, skirmishes continued between the United States and the remaining Seminoles until the end of the Third Seminole War in 1858. Another Seminole group of around 200 was forcefully removed west. After this final group of Seminoles was removed, those remaining escaped to the Everglades'

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relative safety where they separated by linguistic group, with Muscogee speakers moving North of Lake Okeechobee, and Mikasuki speakers to the Everglades.23

In 1934, when the Everglades National Park Act was passed, the Bureau of Indian Affairs Commissioner John Collier seemingly advocated for the Seminoles of South Florida. He saw himself as a champion of Native American rights and culture, despite in many instances lackluster results. His efforts effectively pushed US policy regarding Native Americans from assimilationist to preservationist.24 As part of those efforts, Collier wrote into section three of the act, "Provided further that nothing in this act shall be construed to lessen any existing rights of the Seminole Indians."25 While this language may initially seem like a genuine effort to protect Seminole sovereignty, it was insufficient and far too vague to be of use.26 Such ambiguous language was often used in treaties to purposefully provide loopholes for future manipulation of rights, territories, and sovereignty. Collier does not enumerate existing Seminole rights or indicate what would qualify as an infringement on or effort to lessen such rights, making the statement ineffectual and susceptible to manipulation.

Despite the Everglades National Park Act's protective statement, the language was not substantive enough to protect Native American interests and merely placated the general public, as shown in a letter from John Collier to Ernest F. Coe, a landscape designer from Connecticut and an outspoken supporter of and advocate for Everglades National Park. Collier states, “[The Seminoles] have no special rights or privileges in the National Parks. Of course, they may be employed…but this is an individual matter.”27 Ultimately, Collier’s letter cements that the objective was not to protect Seminole rights but rather to assuage Seminoles into compliance while drafting and passing the Everglades National Park Act.

Ernest F. Coe, a landscape designer from Connecticut, as an outspoken supporter of Everglades National Park and prominent advocate for its establishment, used the vague language in the act to his advantage.28 Initially, Coe supported Collier and the Seminoles in understanding their needs, arguing in the Everglades National Park Congressional Hearings that if "given the chance," the Seminoles would keep to the Everglades and out of Miami; thus, the National Park would keep to the Everglades and out of Miami; thus, the National Park would act as a haven and provide continuity for the Seminoles.29 Coe

26 Keller and Turek, American Indians and National Parks, 226.
29 Hearing Before the Committee on The Public Lands, HR 12381, to Provide for the Establishment of the Everglades National Park in the
even said the Seminoles were an integral part of the Everglades experience and could perhaps act as guides in the park. The language of the 1934 Everglades National Park Act sounded agreeable; however, as with the establishment of other parks, like the Grand Canyon and Yellowstone, Native American rights would be unquestionably challenged.

Additionally, Seminole land rights were challenged as a consequence of the park’s establishment. In the Survey of the Seminole Indians, the Bureau of Indian Affairs provides specific geographic boundaries and notes that camps were far removed from any roads or shops.\(^\text{30}\) The survey continues, stating that since 1880, white settlers went to Labelle for hunting and Fort Myers for cattle ranching and crowded out the Seminoles.\(^\text{31}\) In addition to geographic holds, the document states that Seminole populations had grown between 250% to 270% since the 1880 census, indicating good quality living conditions and few health complications.\(^\text{32}\) While these statistics are encouraging, one must note that they are considered inaccurate because of inconsistent transportation, housing, and location on the Bureau of Indian Affairs agent’s part of Seminole camps. Figure 1, Approximate Locations of Permanent Seminole Camps, Roy Nash After Everglades National Park’s establishment, its development challenged the land use rights of the Seminole and Miccosukee Nations. In the thirteen-year period between the Everglades National Park Act and the Park’s opening, Coe began to strongly disagree with Collier and Nash on what to do about the Seminole and Miccosukee people living on the proposed park land. In a variety of letters, Coe made

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every effort to convince the Bureau of Indian Affairs and Department of the Interior to eliminate Seminole and Miccosukee hunting rights in Everglades National Park boundaries and remove the people from the proposed park lands. Following establishment, J.J. Cameron circulated *The Seminole Problem* memo to park management in which he made several broad conclusions. First, he wrote that Seminoles primarily hunted and used natural resources north of Tamiami Trail, while the boundaries for Everglades National Park were for the most part south of The Trail. Based on the 1930 map, *Approximate Locations of Permanent Seminole Camps*, Cameron’s claim is unfounded as a significant portion of land south of The Tamiami Trail is highlighted as Seminole camps.

J.J. Cameron continued his assessment of "The Seminole Problem," recommending removal and acknowledging that if Everglades National Park was established, then the Bureau of Indian Affairs and the State of Florida should make preparations to remove Native Americans to reservations created within the state. It is essential to acknowledge that these decisions were made within various Bureaus of the Federal Government in conjunction with the State of Florida, thus leaving Seminole people out of the discussion and decision-making process, further challenging their Nation’s sovereignty.

Cameron even recognized that not only have Seminoles strongly opposed removal in the past, referring back to the Seminole Wars in the nineteenth century, but in 1938 they were also citizens of the United States, per the Indian Citizenship Act of 1924. Cameron's memo further proves that despite historical context, legal knowledge, ethical concerns, and certain opposition from the Seminole Nation of Florida, the Seminole Agency, Department of the Interior, and the State of Florida still advocated for removing Seminoles to reservations in Collier County and northeast Florida.

In 1935, a small delegation from the Seminole Nation of Florida appealed to the Secretary of the Interior, Harold L. Ickes, to request reservation lands. Such a request was arguably a result of the impending establishment of Everglades National Park, pressure from environmentalist groups, and the influence of white Floridians like Minnie Moore-Wilson. However, the request and consent to remove were not supported by the rest of the Seminole Nation. This division was a result of external manipulation, reminiscent of the disagreement that led to the Second Seminole War, which occurred nearly a century earlier. Ultimately, this final and most recent fracture in the nation led to the distinct recognition of the Miccosukee and Seminole tribes today. Those agreeing with the delegation moved to reservations, like the Big Cypress Reservation, as the Seminole Tribe of Florida Tribal Historic Preservation Office.

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35 Roy Nash, *Approximate Locations of Permanent Seminole Camps*.
38 “Seminole History,” Seminole Tribe of Florida Tribal Historic Preservation Office.
Florida. As explained by the Seminole Nation of Florida and the Miccosukee Tribe of Indians of Florida, those in disagreement with the delegation remained in the Everglades as the Miccosukee Tribe of Florida.  According to Mikaëla Adams, the split occurred in the 1950s when the Federal government, as part of termination legislation, pushed the Brighton Reservation Seminoles to create a clear political organization through a constitution. This oversight and denial of sovereignty resulted from the budget-cutting Indian Termination Policy adopted by the United States Federal Government from 1948 to 1970. Once the federal government realized that assimilation methods were not working or met positively, they implemented the Termination Policy to make financial settlements and eliminate tribal recognitions.

Throughout much of the 1950s, the Seminole Nation of Florida was considered for Federal Termination. By 1955, the concern over termination had grown so significantly that the Seminole and Miccosukee Nations appealed before a House select committee regarding the proposed policy. The hearing clarified the position of Seminoles, as many advocates, including Clewiston city officials, who outlined how termination policies placed inappropriate stress on local health and social services. Essentially, choosing to remove the Seminole Nation of Florida from consideration of termination was not a decision made for the benefit of Seminoles, but rather made to maintain resources for white taxpayers in Florida.

For the Miccosukee, however, their position was more tenuous as they for the most part lived along US 41 instead of the reservations granted in 1935. Furthermore, they had not complied with Federal pressure to form a constitutional government, and as such were not federally recognized. While less federal interference in Miccosukee business appeared like a positive effect of Termination Policy and the establishment of Everglades National Park, it was, in fact, detrimental because the policy undermined Miccosukee reputation and status as a sovereign nation. In 1959, after nearly two years of negotiations and no progress, in a conscious effort to reassert their sovereignty and leverage Cold War tensions, the Miccosukee, led by Buffalo Tiger and their attorney, sent “several buckskins stating the claims of Indian peoples,” to communist leader Fidel Castro, who had recently seized control of Cuba from President Batista. This action on the Miccosukee Tribes part was bold, considering the heightened fears of communism in the United States, which was in the midst of Cold War anxiety: however, the contact was made to leverage the ongoing tensions. Following their interaction with Castro and his recognition of their sovereignty, the United States extended a short-term land lease to the Miccosukee on the condition that they end

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contact with Cuban officials, thus finally receiving official claim to Everglades land north of Everglades National Park. Another consequence of the establishment of Everglades National Park was its effect on the local South Florida economy. According to The Survey of Seminole Indians, in 1931, the primary income source was hunting and trapping, specifically the fur and skins trade. However, economic trade was not equitably accessible in that white fur traders could receive "better prices than do the Indians by mailing [their] fur direct to Sears, Roebuck, and Co., in Philadelphia.". The Seminoles only started mailing furs in 1930. Before the establishment of Everglades National Park, hunting areas became increasingly limited for the Seminoles. The concept surrounding these limitations is that skillful conservation would preserve a sportsman’s paradise for years to come. Although scientifically correct, this thinking did little to limit new hunting methods being used by whites in Florida and primarily focused on Native American limitation. The biggest issue regarding hunting to C. C. Woodward, the state game commissioner, is that Native Americans were not obligated to hunt according to the season as white hunters were. While Native Americans typically hunted with rifles or traditional weapons, limitations and restrictions were implemented quickly after the Survey of Seminole Indians was released. On top of these restrictions, Native American hunters were frequently undermined by white hunters in the same areas. Stories from central Florida written in the survey described white men decimating populations, killing eleven alligators in a single night with the use of torches, and killing 103 alligators in two nights using powerful reflectors. Coe’s focus on the effect of Seminole and Miccosukee hunting Everglades’ species was unnecessary considering their relatively small impact compared to that of white Floridians. Once Everglades National Park was established, Seminole and Miccosukee land rights and sovereignty were affected. Thus, as Ernest F. Coe wanted, hunting rights were restricted within Everglades National Park, and the Seminole and Miccosukee were not permitted to live or hunt within.

A valuable game sought out by hunters in Florida for the plume and feather trade was great egret and snowy egret. The plume trade was so popular that the sale price for widely desired snowy egret plumes could bring in up to $50 in Fort Myers, while a 6–8-foot alligator skin could be sold for around $2. However, this profitable trade did not last long either because of diminishing population sizes or environmental protection policies. The Audubon Society, in particular, advocated for environmental policies to protect plume birds like the egret. Arguably, the conservation of such species was not purely

44 Kersey Jr., 501.
45 Nash, Survey of the Seminole Indians, 35.
46 Nash, Survey of the Seminole Indians, 36.
48 Keller and Turek, American Indians and National Parks, 222-23.
for biological conservation but also preserved an important aspect of Florida tourism: birding.

Despite these efforts to protect waterbird species, Florida lawmakers chose to drain Lake Okeechobee and divert water to the West and East coasts through canals to allow for increased speculation and farming. The Seminole and Miccosukee Nations significantly felt the consequences of rerouting the runoff as their primary means of navigation were via canoe on the Everglades waterways.\(^{50}\) Additionally, the lack of water running through the Everglades forced species to migrate toward the remaining swampy locations, severely limiting available game in the region. In 1931, *The Survey of the Seminole Indians* even acknowledged that the lack of game made the Seminole’s economic position even more precarious.\(^{51}\) The creation of Everglades National Park and environmental protection advocates resolved many of these issues in population decline and water management, although often at the expense of Seminole and Miccosukee economic stability.

Meanwhile, the National Park’s establishment also served as a catalyst for significant change in the tourism industry. Seminole and Miccosukee citizens were already involved in tourist attractions leading up to the park's establishment. Two of the first tourist attractions were Coppinger’s Tropical Gardens and Musa Isle, both of which were popular in the “curiosity trade,” attraction where Seminole villages were set up and open for public entertainment. These villages blurred the lines between reality and performance, often commodifying the Seminole and Miccosukee cultures.\(^{52}\) Commonplace attractions in these villages were alligator wrestling, hand-crafted goods, and even staged weddings. The craft trade was profitable for all genders and produced supplemental income opportunities.\(^{53}\) Furthermore, it provided an outlet for employment aside from difficult labor, carried on traditions, and educated the public on their economic endeavors.\(^{54}\) While tourist attractions like Coppinger’s provided much needed economic opportunities for Seminole and Miccosukee people, there was a significant element of cultural exploitation and commodification that left many Native Americans and their advocates uncomfortable. Ultimately, these villages provided much needed economic stability for individual and long-term survival of the Seminole and Miccosukee Nations because they leveraged the tourist trade to their economic benefit.

The widespread publicity of the newly established tropical National Park added to the tourist boom. In establishing the National Park, the only official roadway entrances were in


\(^{52}\) Keller and Turek, *American Indians and National Parks*, 223.


\(^{54}\) Cattelino, *High Stakes*, 41.
Everglades City on the Gulf Coast, along Tamiami Trail, and in Homestead. Organizing the Park with multiple entrances, the National Park Service aided overall tourism revenues, which ultimately overflowed into the curiosity trade and Native American tourist attractions throughout South Florida. Although there are not quantified records comparing tourist positively affected revenue for Seminole and Miccosukee people in the Miami and U.S. 41 areas.

As a result of Everglades National Park’s establishment, Seminole and Miccosukee people's land rights changed, affecting their respective nations' sovereignties and economic opportunities. Although leading up to the proposed park's establishment, conservationists advocated for limited hunting and use of the wetlands; a significant reason for the relocation of Seminoles to reservations was the newly established national park. The issue of removal and hunting rights greatly affected sovereignty. The economic story is more complicated than the analysis of effects on sovereignty because some changes ultimately limited economic independence, like hunting limitations and draining the Everglades, while at the same time, other efforts, like tourism, benefited Seminole and Miccosukee people. This analysis is only the beginning of understanding the interconnectedness

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between Everglades National Park and South Florida Native American Nations. Additional work must be conducted to find perspectives from Native American contemporaries of the Park’s establishment and insert their voices into the narrative. The most recent legislation regarding Miccosukee land rights was renewed in 2014, and the final phase of the Everglades water restoration project began in September 2020. These topics of sovereignty, economic opportunity, and land use rights are issues that all Americans must contend with for many years to come to provide equitable access to inclusive historical narratives, natural resources, and economic opportunities.

Furthermore, in the broader literature of National Park history, Everglades National Park is only one example in a 423-unit system that consistently ignores modern Native American history and its own part within that checkered history. Many of these units certainly impacted Native American communities, and their stories are not told within academic or public history. In leaving these narratives out of public history, Americans are kept unaware of how their outdoor recreation spaces came to be, and at what cost to Native communities. A greater emphasis must be placed on these stories and their inclusion in public history, as significant numbers of tourists benefit from the historical displacement and removal of Native Americans.

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