

The Rewilding Institute

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Director, Wilderness and Wild and Scenic Rivers Resources
U.S. Department of Agriculture, Forest Service
201 14th Street, SW
Washington, DC 20250

Re: Proposed rule in the June 7, 2006 Federal Register, volume 71, page 32915.

Dear Director:

The Rewilding Institute opposes the proposed Forest Service rule that would expand trapping, poisoning, and aerial gunning of bears, bobcats, coyotes, foxes, mountain lions, wolves, and other animals in federally designated wilderness areas and research natural areas on Forest Service lands.

The Rewilding Institute is a non-profit, conservation think tank dedicated to science-informed protection and restoration of biological diversity at landscape scales in North America. A primary focus of TRI is the restoration and conservation of ecologically effective populations of predators. Peer-reviewed scientific studies are increasingly documenting the crucial role of predators in maintaining biological diversity and ecological health.

Our reading of this proposed rule convinces us that the rule will do far more than “refine and clarify agency roles” with regard to predator control activities in wilderness and research natural areas. Rather, this rule would greatly expand the opportunities for killing predators and other animals in these protected areas. Activities egregiously incompatible with the purposes of wilderness and research natural areas, such as the use of M44 sodium-cyanide devices, aerial gunning, and denning (the killing of pups dug from dens) would be allowed under this proposed rule. The killing of predators on wilderness and research natural areas would surely increase if this rule is adopted. Additionally, the proposed rule could significantly increase the use of motorized equipment including helicopters and all terrain vehicles in wilderness areas (the Wilderness Act generally prohibits the use of motorized equipment and mechanical transport) in the pursuit of predators with the intent to kill them, which would substantially degrade opportunities for solitude. Decision-making (currently vested in Regional Foresters) with regard to the killing of

predators and the use of motorized equipment would be delegated to ill-defined local collaborative groups.

We view the proposed policy changes as philosophically and legally incompatible with the purposes of the Wilderness Act to preserve and protect lands in the National Wilderness Preservation System in their “natural condition” (Section 2(a)). Furthermore, the Act establishes a policy of administering and protecting these lands “for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness...” Wilderness areas are recognized by the act as areas “where the earth and its community of life are untrammelled by man...” that retain their “primeval character.”

We are simply astonished that the US Forest Service would consider the activities that would be authorized by the promulgation of this rule to be appropriate and consistent with the purposes and policies established by the Wilderness Act and the regulations governing the establishment of research natural areas.

We believe that the proposed rule would have significant impacts on the ecological integrity of wilderness and research natural areas, the safety of people (and their pets) using these areas, and the policies and purposes established by the Wilderness Act and the regulations governing research natural areas. We disagree with the Forest Service’s determination that the proposed rule qualifies for “categorical exclusion” from the provisions of the National Environmental Policy Act (NEPA).

The Rewilding Institute recommends that this proposed rule be withdrawn and receive no further consideration by the Forest Service. Should the Forest Service consider finalizing this rule, we recommend a full assessment and disclosure of the potential environmental impacts of its promulgation under the provisions of NEPA.

We appreciate this opportunity to comment.

Sincerely,

David R. Parsons
Carnivore Conservation Biologist