



Public Employees for Environmental Responsibility

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August 21, 2015

Mr. Stan Austin
Regional Director
Southeast Region
National Park Service
100 Alabama Street, SW
1924 Building
Atlanta, GA 30303

Dear Regional Director Austin:

The *Miami Herald* reports on August 18, 2015 that Everglades National Park Superintendent Pedro Ramos has approved the establishment of “hunting zones” for pythons in the Park under a State of Florida Fish and Wildlife Conservation Commission program called the “Python Challenge.”

Public Employees for Environmental Responsibility (PEER) calls upon you to immediately terminate this program announced by Mr. Pedro Ramos to allow the hunting of pythons in Everglades National Park.

PEER recognizes that the Secretary of the Interior is empowered by Section 3 of the 1916 National Park Service Organic Act to “...provide in his discretion for the destruction of such animals...as may be detrimental to the use...” of the parks.

PEER does not dispute that the pythons that threaten Everglades National Park are a non-native, invasive species, and are a “detriment” to the park. Nor does PEER challenge the “ends” that Mr. Ramos seeks. We challenge the “means.”

The NPS, its employees or agents are free to pursue and kill pythons. Instead, Mr. Ramos will allow, under the aegis of the State of Florida, members of the public with Florida licenses to pursue, capture and/or kill pythons in a National Park which is closed by law and Federal regulation to hunting. This is a decision without precedent in the history of the national park system.

Mr. Ramos decision, though simplistic and well-meaning, has broad implications beyond the borders of the Everglades. If you allow the decision to stand, then conceivably the NPS could next allow members of the public with state hunting licenses to pursue wild boars in Great Smoky Mountains National Park, or any other similarly situated National Park.

Mr. Ramos has utterly failed to construct a response to the python issue that is consistent with the laws that govern the national park system. There are few lines brighter than Congress, the courts and the NPS have drawn around the parks than that which safeguards National Parks from public hunting. Nor has Mr. Ramos taken any apparent steps to ensure that his actions comply with the National Environmental Policy Act (NEPA).

The NPS has confronted the issue of non-native animals, or excess populations of native animals, in many units. To give a just a few examples, the NPS has reduced overpopulated whitetail deer in Valley Forge, Gettysburg and Rock Creek. The NPS has never done so by allowing a regulated hunt by members of the public. The NPS prepared NEPA for every such action. The NPS has removed feral, non-native burros from Grand Canyon, Lake Mead, Death Valley and Bandelier. The NPS has never allowed this activity by members of the public except as authorized agents or contractors. Moreover, the NPS prepared NEPA for every such action.

Congress has provided only once for reduction of detrimental animal populations by State-licensed members of the public in a National Park. Section 6 of the 1950 enabling act for Grand Teton National Park authorizes controlled reduction of the elk population by Wyoming-licensed hunters. Such persons must also be “deputized as (park) rangers.”

The inclusion of Section 6 in the Grand Teton enabling act speaks to the great sensitivity Congress demonstrates towards hunting, (or, as at Grand Teton, to an activity that resembles hunting) in a National Park. Hunting, trapping or similar activities by the public may occur only in those national park system units where specifically provided for in law (36 CFR 2.1 and 2.2). Everglades National Park is not one of those park system units. Everglades National Park lacks any authority equivalent to Grand Teton.

In the last decade the NPS has addressed removal of detrimental animal populations at both Rocky Mountain and Theodore Roosevelt National Parks. Both National Parks adopted plans where NPS-authorized members of the public may shoot elk under the guidance and supervision of NPS specialists and Rangers. These were extremely controversial decisions. The NPS adopted the plans only after rigorous study and full compliance with NEPA. By contrast, there appears to be no environmental compliance for Mr. Ramos decision.

Mr. Ramos has little experience in the National Park Service. Everglades is the first National Park in which he has worked and he was immediately placed in charge. His previous experience was in a single unit – Big Cypress National Preserve, one of 64 national park system units open by law to hunting and trapping. Not unexpectedly, he

appears to have little sensitivity towards the fundamental and historic values that surround the issue of public hunting in the National Parks.

Frankly, we expect better, Mr. Regional Director.

Please halt this program until such time as the NPS conducts environmental compliance that includes consideration of a full range of alternatives. We call upon you to provide the additional resources needed so that the manager and staff of Everglades National Park may engage in a more serious and sustained effort to reduce the pythons.

Cordially,

Jeff Ruch
Executive Director