

# THE WILDLIFE SOCIETY

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June 16, 2014

A.J. North  
Regulations Program  
National Park Service  
1849 C Street NW, MS-2355  
Washington, DC 20240

**RE: Regulation Identifier Number 1024-AE06**

Dear National Park Service Regulations Program,

The Wildlife Society thanks you for the opportunity to provide comments and support for the National Park Service's recent clarifications regarding domestic and feral animal policies.

The Wildlife Society (TWS) was founded in 1937 and is a non-profit professional society representing nearly 10,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

Non-native, feral species are recognized as one of the most widespread threats to native wildlife populations and natural ecosystems. Feral cats are significant predators on small mammals, birds, reptiles, and amphibians. Some studies have estimated feral cats kill over a billion birds each year in the U.S. Feral swine populations have continued to spread across the U.S., including several NPS-managed lands. Feral swine are known disease reservoirs and cause extensive damage to property, agriculture, and natural resources through their aggressive "rooting" behavior that churns up the soil and destroys native habitats.


TWS supports the NPS's efforts to define feral species and clarify more comprehensive policies regarding at large domestic and feral animal management approaches for the protection of the public's native wildlife resources.

To improve the proposed rule, TWS suggests some additional clarification in the definition of "feral animals" to indicate these designations are based on the *species* of animal, and not an *individual* animal. Many feral species reproduce outside of a domesticated setting and the offspring of those animals should also be regarded as feral. The definition for "feral animal" as currently written could be interpreted to only include *individual* animals which at one point in their lifetime were tamed to live in the human environment and now exist in an untamed state. This interpretation could prove problematic for NPS's intention to protect wildlife and native ecosystems from impacts caused by *reproducing feral populations* and could be avoided with more clarification in the definition.

TWS believes the proposed rules are a good advancement and provide needed updates to NPS's policies regarding domestic and feral animals that, with some additional modification, will allow NPS employees to appropriately address threats feral populations pose to the public's native wildlife resources. These provisions will enable NPS to meet its statutory purpose "to conserve the scenery and the natural and historic objects and the wild life [in the parks]... by such means as will leave them unimpaired for the enjoyment of future generations."

Thank you for considering the recommendations of wildlife professionals and working to reduce the impacts feral species have on native wildlife populations. Please contact Keith Norris, Assistant Director of Government Affairs at (301) 897-9770 x309 if you require further information or have any additional questions.

Sincerely,

A handwritten signature in black ink that reads "Jonathan B. Haufler". The signature is written in a cursive style with a large initial 'J'.

Jon Haufler, President  
The Wildlife Society

Enclosed: TWS Position Statements "Feral & Free Ranging Domestic Cats" and "Feral Swine in North America"