



UNITED STATES
DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO

N1427-N

FO 18-67

September 22, 1967

Memorandum

To: All Field Offices

From: Director

Subject: Implementation of the Leopold Committee Report,
"Wildlife Management in the National Parks"

As a result of the report and recommendations of the Secretary's Advisory Board on Wildlife Management in the National Parks, approved by the Secretary on May 2, 1963, the following administrative policies have been adopted by the Service:

Plant and Animal Resources. Natural areas [National Parks and National Monuments of scientific significance] shall be managed so as to conserve, perpetuate, and portray as a composite whole, the indigenous fauna, flora, and scenic landscape. Management will minimize, give direction to, or control those changes in the native environment and scenic landscape resulting from human influences on natural processes of ecological succession. Missing native life forms may be reestablished, where practicable. Native environmental complexes will be restored, protected, and maintained, where practicable, at levels determined through historical and ecological research of plant-animal relationships. Nonnative species may not be introduced into natural areas. Where they have become established or threaten invasion of a natural area, an appropriate management plan should be developed to control them, where feasible.

Public Hunting. Public hunting shall not be permitted in natural areas.

Wildlife Populations. Wildlife populations will be controlled when necessary to maintain the health of the species, the native environment and scenic landscape and to safeguard public health and safety. Ungulate populations will be maintained at the level that the range will carry

in good health and without impairment to the soil, the vegetation, or to habitats of the several species in an area.

Wildlife Management Program. Insofar as possible, control through natural predation should be encouraged. Public hunting outside of the area is recognized as the next most desirable means of controlling wildlife populations. Cooperative studies and management plans with States and other Federal agencies are to be continued to facilitate public hunting outside of the areas, especially through extended special seasons established by the States for public hunting outside the areas. Other control measures, as necessary, shall be undertaken as follows: (1) Live-trapping in the areas for transplanting elsewhere; (2) research specimens for National Park Service and cooperating scientists; and (3) direct reduction by National Park Service personnel. It is recognized that it may be necessary, on occasion, to carry on each phase of this program simultaneously. The National Park Service will adjust the use of these control methods (except natural predation) to meet varying weather and other relevant conditions, giving highest priority to the opportunities for public hunting outside the areas and live-trapping in the areas for transplanting elsewhere.

Research. The short and long term research on distribution and abundance of wildlife populations, changes in habitat conditions, and trends in forage utilization is to be continued and enlarged to provide the basis for continuing evaluation of the management program and to determine annual wildlife reduction requirements, if any.

Among its recommendations, the Leopold Committee stated, in part, as follows:

"Most game reduction programs can best be accomplished by regular park employees. But as removal programs increase in size and scope, as well may happen under better wildlife management, the National Park Service may find it advantageous to employ or otherwise engage additional shooters from the general public. No objection to this procedure is foreseen so long as the selection, training, and supervision of shooting crews is under rigid control of the Service and the culling operation is made to conform to primary park goals." (Emphasis supplied.)

Wildlife management programs of the Service, for the most part, involve indigenous animals, such as deer, elk, and other native ungulates; and feral animals, such as goats, pigs, and burros. Most of these animals are subject to public hunting outside of the national parks and national monuments.

The wildlife management programs carried on by the Service to date have been of the size and scope that can best be accomplished by regular, full-time park employees. It is evident, however, that we are not going to be able to continue to achieve our objectives, particularly with respect to the management of feral animals, solely through the use of permanent, full-time park employees. As a result, in the future we will utilize part-time Deputy Park Rangers to assist in this program, as recommended by the Secretary's Advisory Board, and as approved by the Secretary. When such personnel are used, they will carry on these functions "under rigid control of the Service***." Moreover, no part of the direct reduction program will have any aspect of sport or recreational public hunting. To insure this result such specially engaged personnel shall operate as a part of a crew under the supervision of a permanent, full-time Park Ranger of the Service.

Such personnel as are needed, from time to time, will be recruited as follows:

Personnel needed will be secured and appointed locally as Deputy Park Rangers, WOC (without compensation), under Schedule A 213.3102(k) authority which is Title 5 U.S.C. 3320 - The Act of August 25, 1916 (39 Stat. 535). Prior clearance from the Regional or Washington Office is not necessary in making these appointments. The Form 52 supporting each appointment should include under remarks a simple statement as to the purpose for which the appointment is made, to support the conclusion that it is in the Government interest.

State game management personnel also may be engaged (without compensation) under the foregoing arrangements. Their involvement in the direct reduction program oftentimes may be advantageous in the interest of continuing Federal-State cooperation in all facets of the park program.

Of course, part-time Park Ranger personnel employed in these programs may be compensated, when necessary. In this case appointments may be made in accordance with the usual procedure for employing seasonal part-time uniformed personnel.

All personnel engaged in the wildlife reduction program must be highly skilled in firearms safety, animal identification and marksmanship.

Such personnel as may be engaged under the foregoing arrangement may prefer to utilize their own weapons and ammunition. This is acceptable. On the other hand, if they desire Government weapons and ammunition, these may be furnished. Government ammunition may be supplied for private weapons when engaged in the management program, if preferred.

The carcasses of animals killed by such personnel are Government-owned personal property and are to be disposed of in accordance with applicable regulations governing the disposition of surplus property. The pertinent regulations are contained in Title 41 of the Code of Federal Regulations, Subparts 101-43.3, 101-44.3, 101-44.5, 101-45.3 and 101-45.5, issued pursuant to the provisions of the Federal Property and Administrative Services Act of 1949, 63 Stat. 378, as amended, 40 U.S.C. 471.

The regulations are rather voluminous and it is impracticable to duplicate them here. All regional offices and many of the larger areas have copies of the complete Title 41 of the Code of Federal Regulations. Any Superintendent not having a copy of the regulations and needing them may obtain, on loan, a copy through the appropriate Regional Director.

The carcasses of animals killed in a reduction program are perishable personal property. Accordingly, the carcasses do not have to be reported to the General Services Administration (GSA). 41 CFR 101-43.312. Moreover, in connection with the preparation of this memorandum we consulted with GSA officials in Washington who advise that there is no need to inform GSA Regional Offices of the availability of the carcasses, as suggested in Section 101-43.306 of the regulations. Accordingly, if there is no use for them by the National Park Service for maintenance of the ecosystem, research or other Federal purposes, the carcasses may be disposed of by several methods, discussed below, depending upon their value.

I. Although it is very unlikely, some reduction programs may involve animal carcasses having an economic value that would justify the sale of carcasses in accordance with the regulations of Subpart 101-45.3. This possibility should be explored before the reduction program is commenced in order that there will be sufficient time to comply with the appropriate regulatory requirements should it be in the best interests of the Government to sell the carcasses.

II. If it is determined by the Superintendent that the carcasses have no commercial value or that the estimated costs of handling, transportation and storage would exceed the estimated proceeds from a sale, the carcasses may be donated to public bodies--including Indian tribes. 41 CFR Subpart 101-44.5. When it is determined to donate carcasses to public bodies, the agreement of November 4, 1965, between the Service and the Bureau of Indian Affairs commits the Service to donate as many carcasses as possible to the Indian tribes (Chapter 1, Section 5.9, Part 10, of the Organization Volume). Where suitable arrangements can be made with public bodies for the donation of the carcasses, consistent with reasonable costs to the Service, this method of disposal is preferred, when commercial sale is not practicable.

III. If it is infeasible to donate the animal carcasses to public bodies because of (1) lack of interest by public or charitable groups to receive them; or (2) excessive costs to the Government in removing and preparing the carcasses in a manner suitable for donation (field dressing, etc.); or (3) other good reason such as isolation of carcasses in remote areas, etc., the carcasses may be abandoned in accordance with the provisions of Subpart 101-45.5. The determination of the infeasibility of donation will be made by the Superintendent.

When it is determined to abandon the animal carcasses, the carcasses may be removed and utilized by the part-time Deputy Park Ranger personnel engaged (without compensation) in the management program. In connection with the removal of the abandoned carcasses from a Federal area and their utilization outside of such areas, all part-time Deputy Park Rangers should be cautioned as to the possible need for a state transportation permit, or a state hunting license, as appropriate under state law, permitting them to have in their possession, to transport, or otherwise utilize carcasses of the animals outside the national park or national monument. A state hunting license is not required, of course, by federally appointed personnel (with or without compensation) engaged in carrying out the Federal functions of wildlife reduction in the national parks and monuments, except at Grand Teton National Park, which is the subject of special Federal legislation in this regard.

To insure the orderly implementation of this program, each Superintendent carrying on a wildlife management program in which direct reduction of animals is required shall submit a plan of the proposed reduction to this office, not less than 90 days in advance of undertaking the reduction. This plan shall include, among other things, the numbers and kinds of animals to be reduced; the period of time during which the reduction is to take place; and, the personnel to be engaged in the reduction (the

number of regular permanent employees to be involved, as well as an estimate of the number of part-time personnel (with and without compensation) to be involved). Likewise, when wildlife management programs do not require direct reduction of animal populations in areas that have had such reductions in the past, a report so stating, and the reasons therefor, must be submitted to this office at least 90 days in advance of the month in which reduction would normally take place.

Thank you very much.

A handwritten signature in black ink, appearing to read "George B. Harbison". The signature is written in a cursive style with a large, sweeping initial "G" and a long, horizontal flourish extending to the right.

This memorandum will remain in effect until its contents are incorporated into appropriate handbooks.