

NATIONAL RIFLE ASSOCIATION OF AMERICA

INSTITUTE FOR LEGISLATIVE ACTION

11250 WAPLES MILL ROAD

FAIRFAX, VIRGINIA 22030



NRA

June 13, 2006

National Park Service
Denver Service Center
Big Cypress Planning Team
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225-9901

Dear Big Cypress Planning Team:

The National Rifle Association (NRA) takes this opportunity to respond to the National Park Service's announcement that the scope of the General Management Plan/Environmental Impact Statement (GMP/EIS) for the Big Cypress National Preserve Addition Lands will be expanded to include a wilderness study and an off-road vehicle management plan. The announcement invited the public to comment on these subjects.

The focus of our comments is on the wilderness study. The NRA acknowledges the fact that the study is required by the Addition Lands' enabling legislation; however, we believe that the language was included as standard language in legislation creating units of the National Park System at the time and didn't take into account the long history of mankind's presence in that area. A central issue to the wilderness review is how designation of wilderness will affect the traditional and customary activities that the enabling legislation and its supporters took great pains and precautions to protect.

The National Park Service's overview of the Wilderness Act, as provided in its website information about the GMP process, states that hunting, fishing, hiking, canoeing, camping etc. will be allowed, provided that motorized equipment or mechanical transportation is not used. This restriction may be acceptable in other units of the National Park System where mankind's presence was rarely felt and recreational activities, other than the very primitive, were uncommon. This is not the situation with the Addition Lands where these activities have been taking place for decades with the help of motorized vehicles and equipment. Wilderness designation would strangle traditional access and close the area to sportsmen whose activities the enabling legislation sought to protect.

The Wilderness Act overview also notes that for an area to qualify as wilderness it has primeval character and influence to be retained. The Addition Lands have long been inhabited, visited and used by man such that this requirement for wilderness designation does not exist. If it did, it is unlikely that the Big Cypress would have been established as a National Preserve and the

Addition Lands added to it. It would have been designated as a national park. Designation of a national preserve indicates that the area is more "open" to human activity than what is generally allowed in a national park, including such activities as hunting and the use of OHVs. Wilderness designation would turn the concept of a "Preserve" on its head.

The overview also notes that wilderness designation must at a minimum meet certain criteria including that the designated area appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. For centuries man has traversed the Big Cypress and the Addition Lands. Man's imprint is found throughout the Addition Lands. The network of ORV trails alone would disqualify the area as suitable for wilderness designation.

In closing, the NRA agrees that the GMP/EIS should be expanded to include the wilderness study only because the summary of the GMP process states that, "until the wilderness suitability study and general management plan are completed, the Addition Lands will remain closed to recreational OHV use." However, the NRA strongly opposes any designation of wilderness within the Addition Lands because it contravenes the intent of Congress and the enabling legislation.

Big Cypress National Preserve and the Addition Lands were set aside to provide recreational opportunities not generally allowed in national parks. There was no intent to have these activities and the access necessary to enjoy them subjected to the restrictions of a national park designation, and most assuredly the intent was not to subject them to the restrictions of the Wilderness Act.

Thank you for the opportunity to submit comments for the public record.

Sincerely,



Susan Recce
Director
Conservation, Wildlife and Natural Resources