

# RESTORE:



December 16, 2014

George Price  
Superintendent  
Cape Cod National Seashore  
99 Marconi Site Road  
Wellfleet, MA 02667

Dear Superintendent Price:

I am writing on behalf of RESTORE: The North Woods in support of the request by Predator Defense, and other groups and individuals — dated December 10, 2014 — to ban hunting of carnivorous predators within Cape Cod National Seashore (CACO). RESTORE is a nonprofit organization based in New England, with more than 1,500 members and supporters in Massachusetts and across the country. Many of these members and supporters have visited CACO in the past, plan to visit in the future, or live near CACO.

We believe that Predator Defense has presented a well-documented and convincing rationale for ending predator hunting within Cape Cod National Seashore. We were disappointed to see National Seashore staff quoted in the Cape Cod Times, saying, “The EIS [2007 Final Environmental Impact Statement, Hunting Program at Cape Cod National Seashore] was fully vetted over multiple years, so I’m not sure why we’re talking about this now,” and “the Seashore is experiencing an imbalance with too many animals because of humans feeding them or leaving trash behind.”

(<http://www.capecodtimes.com/article/20141212/NEWS/141219822/101015#sthash.iw24zhku.dpuf>)

If this is an accurate quotation, it is not supported by the substance of the 2007 EIS, or by other substantive documentation made available to the public. In fact, the EIS barely even mentioned predators and included no substantive analysis regarding this subject. The EIS did acknowledge that, there are “very few” coyote and fox hunters at CACO (FEIS at 11), but it also revealed that, “coyote hunting has been increasing in the last 4 to 5 years, largely due to the belief that coyotes are competing with deer hunters for that species.” (FEIS at 15). The EIS did not include any analysis of the legitimacy or impacts of this “belief,” and its accuracy is highly questionable from a scientific standpoint.

If the National Park Service (NPS) had done a thorough analysis of this issue for the EIS, it would have shown that predator hunting degrades ecological integrity by disrupting predator-prey relationships. Moreover, the killing of predators undermines public health. Cape Cod has among the highest incidences of Lyme disease in Massachusetts (see <http://ag.umass.edu/tick-borne-disease-diagnostics/about-lyme-disease>), thanks to plentiful deer and white-footed mice, which are vectors for the disease-spreading deer tick. Coyotes, foxes, and other predators can help to control deer and mouse populations and mitigate the threat of Lyme disease.

Instead of assessing and educating the public about the benefits of protecting coyotes and other carnivores, the National Park Service is submitting to outdated and senseless state laws and regulations that encourage people to kill these predators. The NPS has no obligation to follow this retrograde state

predator killing policy. It has not independently documented any ecologically valid basis for killing predators within CACO. It has not even shown that there is significant public demand for predator “sport” hunting. We must conclude that the agency has been allowing predator hunting to continue mainly to avoid political controversy. The National Park Service can and must do better than this.

Our National Park System is capable of providing the strongest available protection for natural, historic, and recreational values. The unique mandate of the 1916 National Park Service “Organic Act” requires our parks to be managed “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” The agency’s “Management Policies” specify that, “when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant.” Allowing predator hunting at Cape Cod National Seashore is not consistent with this mandate.

The challenge by Predator Defense provides an opportunity for the National Park Service to end, once and for all, the harmful and self-defeating practice of predator hunting. Indeed, CACO should take advantage of this opportunity to provide leadership for the restoration and protection of healthy native ecosystems, as has been done in many other parks across the country. RESTORE’s members and supporters would favor such an action and, we believe that most other citizens of Massachusetts, New England, and the nation would agree.

I would be glad to discuss this issue further with you or your staff. I can be reached at [kellest@restore.org](mailto:kellest@restore.org) or at our Massachusetts office address and phone number. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'M' followed by a long, horizontal line extending to the right.

Michael J. Kellett  
Executive Director