



March 15, 2024

Shannon Estenoz  
Assistant Secretary for Fish and Wildlife and Parks  
Department of the Interior  
1849 C Street N.W.  
Washington, DC 20240

**Re: Big Cypress National Preserve Wilderness Designations**

Dear Assistant Secretary Estenoz,

Safari Club International (“SCI”) and its members have long supported hunting on Big Cypress National Preserve and Addition lands (“Preserve”). Consistent with SCI’s past engagement regarding the Preserve, SCI encourages the National Park Service (“Service”) to reconsider and withdraw any proposed Wilderness designations.

**Safari Club International**

SCI, a nonprofit I.R.C. § 501(c)(4) corporation, has more than 88,000 members and advocates worldwide. SCI has seven chapters and more than 1,500 active members in the State of Florida, including many who hunt and recreate in and near the Preserve. SCI’s missions include the conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation tool.

SCI has submitted comments related to management of the Preserve at least ten times in the past 15 years. In addition, SCI intervened to defend the Service’s Final General Management Plan, Wilderness Study, Off-Road Vehicle Management Plan, and Final Environmental Impact Statement for the Preserve and Addition (M.D. Fla. Case Nos. 14-15326, 15-11599, 11th Circuit Case Nos. 11-578, 11-647). Additionally, SCI members have submitted comments on proposals to revise (or reduce) hunting and recreational access and Off-Road Vehicle (“ORV”) use on the Preserve.

**SCI opposes Wilderness designations in the Preserve.**

SCI supports increased backcountry access for sportsmen and women who wish to hunt and recreate in the Preserve. Hunting and associated motorized vehicle use were common on the lands that make up the Preserve prior to its creation. These activities must be protected. Although hunting can occur in designated Wilderness, motorized vehicle use cannot. SCI encourages the Service to adhere to Congress’ directives to protect traditional uses of the lands that compose the Preserve and reconsider any anticipated Wilderness designations.

Congress created the Preserve cognizant of the extensive recreational activities, including hunting and associated ORV use, occurring on the to-be-acquired Preserve lands. To garner support for this new protected area, Congress mandated that those activities would continue. Specifically, Congress directed the Secretary of the Interior to permit recreational activities, including hunting, on these lands. To make its intent clear, Congress used “shall” in the statute to describe the Service’s obligation to provide recreational opportunities:

The Secretary **shall** permit hunting, fishing, and trapping on lands and waters under his jurisdiction within the Preserve in accordance with the applicable laws of the United States and the State of Florida, except that he may designate zones where and periods when no hunting, fishing, trapping, or entry may be permitted for reasons of public safety, administration, floral and faunal protection and management, or public use and enjoyment.

Pub. L. 93-440, 88 Stat. § 1257 (Oct. 11, 1974), codified at 16 U.S.C. § 698j (emphasis added). Congress provided a similar mandate in the statutory language pertaining to the Addition: “The Secretary and other involved Federal agencies **shall** cooperate with the State of Florida to establish recreational access points and roads, rest and recreation areas, wildlife protection, hunting, fishing, frogging, and other traditional recreational opportunities in conjunction with the creation of the Addition ...” 16 U.S.C. § 698m-2 (emphasis added).

SCI also emphasizes the importance of motorized access to protect the Preserve’s natural qualities. Motorized access is necessary to assist with invasive species control and habitat improvement efforts. Designating extensive Wilderness will do more harm than good when it comes to maintaining the Preserve’s natural environment.

Finally, SCI reminds the Service of its obligations to consult and collaborate with the State of Florida. The Florida Wildlife Conservation Commission has submitted extensive comments on proposed Preserve management changes. Notably, these comments **support** current or expanded levels of hunting and recreational access and current or expanded levels of ORV access, and **oppose** Wilderness designations. The Service must seriously consider these concerns. Coupled with the comments and opposition of SCI and other organizations, they should outweigh the limited benefits of Wilderness designations.

SCI appreciates the Service’s past efforts to improve hunting access to the Preserve. However, Wilderness designations threaten to prohibit certain recreational opportunities, contrary to Congress’ intent, and would lessen the Preserve’s natural qualities. If you have any questions about SCI’s position on this matter, please contact SCI’s legal team at [litigation@safariclub.org](mailto:litigation@safariclub.org).

Sincerely,



W. Laird Hamberlin  
CEO, Safari Club International