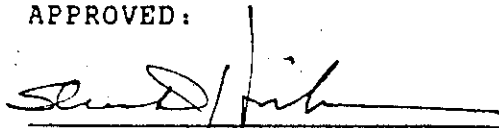


TRAPPING MANAGEMENT PLAN
FOR
BARATARIA PRESERVE UNIT
JEAN LAFITTE NATIONAL HISTORICAL PARK
AND PRESERVE

National Park Service
U.S. Department of the Interior

APPROVED:



ACTING Superintendent
Jean Lafitte National Historical
Park and Preserve



Regional Director
Southwest Region

09-26-90
Date

10/5/90
Date

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TRAPPING MANAGEMENT PLAN

INTRODUCTION

GENERAL INFORMATION

The United States Congress established Jean Lafitte National Historical Park and Preserve on November 10, 1978 with the enactment of Public Law 95-625. The park was established,

"In order to preserve for the education, inspiration and benefit of present and future generations significant examples of natural and historical resources of the Mississippi Delta region and to provide for the interpretation in such a manner as to portray the development of cultural diversity in the region..."

In recognition of developing the cultural diversity of the region, traditional activities historically associated with the region would be preserved. Congress mandated that as part of the enabling legislation of Public Law 95-625 that,

"Within the Barataria Marsh Unit, the Secretary shall permit hunting, fishing (including commercial fishing), and trapping in accordance with applicable Federal and State laws, except that within the core and on those lands acquired by the Secretary pursuant to section 902(c) of this title, he may designate zones where and establish periods when no hunting, fishing, or trapping shall be permitted for reason of public safety. Except in emergencies, any regulations of the Secretary promulgated under this section shall be put into effect only after consultation with the appropriate fish and game agency of Louisiana."

The Barataria Marsh Unit, now known as the Barataria Preserve is one of four units within the Jean Lafitte National Historical Park and Preserve. The Barataria Preserve Unit is located in Jefferson Parish, Louisiana, approximately 12 miles south of the city of New Orleans. This unit is adjacent to the northeastern shore of Lake Salvador. See General Location Map 1.

This unit consists of two areas totaling approximately 18,275 acres. On the south is a "core area" of 8,452 acres in which the National Park Service has acquired 8,200 acres. On the north is a park protection zone of approximately 9,824 acres in which the National Park Service has acquired 1,304 acres.

This trapping plan was developed by the National Park Service in close coordination with the Louisiana Department of Wildlife and Fisheries. Public involvement was also utilized. A proposed trapping plan/environmental assessment was released for public review and comment on August 15, 1990. The comment period extended to September 17, 1990. A public "Open House" was also held on August 27, 1990, to provide the public with an opportunity to discuss their concerns and to present their comments.

The trapping plan addresses the 9,504 acres currently managed by the National Park Service. Leases for traditional trapping do not affect approximately 41% of this acreage because of visitor safety. Because land acquisition measures are ongoing, the plan also addresses how trapping will be managed when additional parcels are acquired.

The Barataria Preserve Unit is in the Barataria basin. This broad, low-lying basin represents the most recently abandoned Mississippi River Delta lobe, where natural delta building processes no longer operate. The basin remains geologically active as an area of subsidence, shoreline erosion and saltwater intrusion. Three major plant communities and associated wildlife characterize the unit.

A major component of this trapping plan is to effectively reduce the numbers of nutria (Myocaster coypus) within the Barataria Preserve Unit. Nutria are marsh-loving rodents which flourish in the warm Gulf Coast climate. Adults are 8 to 20 pounds, about three feet long, including a round scaly tail. Nutria were introduced from South America to Louisiana in 1937. They have altered ecosystem dynamics, and in some cases, displaced native furbearers. National Park Service natural resource management policy dictates that lands and habitats be managed in a manner to "maintain, rehabilitate, and perpetuate their inherent integrity." "Management of populations of exotic plant and animal species, up to and including eradication, will be undertaken wherever such species threaten park resources or public health and when control is prudent and feasible."

Based upon existing data, current conditions and consultation with the Louisiana Department of Wildlife and Fisheries, a minimum annual harvest ranging from 3,000 to 5,000 nutria has been identified as necessary to prevent further resource damage within the Barataria Preserve Unit of Jean Lafitte National Historical Park and Preserve.

BRIEF HISTORY OF TRAPPING IN THE AREA

Louisiana continues to lead the United States in the production of wild furs. This position is the result of the state's vast wetlands and the productivity of the habitat for nutria, muskrat, raccoon, mink and river otter.

Historically, trapping has occurred in coastal Louisiana and in the Barataria Preserve Unit for more than 200 years. Over the past 50 years, changes in the harvest of furbearers have occurred. Muskrat harvests have decreased and annual nutria harvests have grown from none to over 1 million.

Based upon information from Robert G. Linscombe of the Louisiana Department of Wildlife and Fisheries, prior to the escape of the exotic nutria into Louisiana wetlands in 1937, muskrats occurred in extremely high densities in coastal Louisiana. These densities were high enough to support harvest in the mid 1940's of over 12 million pelts in one season while not reducing the population sufficiently to avoid damage to marsh habitat. However, by 1962 the annual nutria harvest surpassed that of the muskrat, averaging 1.4 million pelts from 1962 to 1982. In the Barataria Preserve Unit, trapping data over the last eight seasons shows that nutria accounted for 95% of the harvest.

The Barataria Preserve Unit is a very small area of marsh and swamp as compared to the entire Inactive Delta of the Mississippi River. However, the ecological factors that influence furbearer population densities, trapping effort and harvest rate on the fresh and intermediate marshes of the Inactive Delta, generally affect the marshes of the Barataria Preserve Unit.

PURPOSE OF PLAN AND NEED FOR THE PROPOSAL

Section 905 of Public Law 95-625 permits the continuation of "traditional uses" including the trapping of furbearing animals within the Barataria Preserve Unit of Jean Lafitte National Historical Park and Preserve.

After obtaining additional data on trapping and receiving two reports by the Louisiana Department of Wildlife and Fisheries, the National Park Service has developed a proposed trapping plan for the Barataria Preserve Unit. After public review, the plan was finalized and in effect on or before November 1, 1990. The trapping plan is consistent with Public Law 95-625, the

park's General Management Plan and the Resource Management Plan.

OBJECTIVES OF THE PLAN

There are two objectives of this plan. These are:

1. Regulate trapping activities at Jean Lafitte National Historical Park and Preserve in accordance with P.L. 95-625 and other applicable statutes, regulations and policies.
2. Control nutria, non-native furbearer, to prevent habitat deterioration known as "eat-outs," which cause unacceptable damage to the marshland ecosystem.

PREVIOUS SITUATION

During the 1988-89 and 1989-90 trapping seasons, a temporary moratorium was placed in effect as the result of a consent agreement stipulated as part of a court proceedings in the case of Fund for Animals and Orleans Audubon Society, et al, v. Secretary of the Interior. This moratorium allowed the trapping of nutria while limiting or curtailing the harvest of native furbearers such as river otter, muskrat, mink and raccoon. Prior to the moratorium the following trapping management program was in effect.

Although there are 8 trapping leases in the Barataria Preserve Unit, the level of trapping activity varied from year to year. Records from 8 trapping seasons show that an average of only 4 permittees per year actively engaged in trapping.

TRAPPING SEASON:

Generally December 1 through the last day of February.

REGISTRATION PROCEDURE:

The previous trapping program operated under a lease permit system. The lease permit costs \$50.00. This fee was an administrative cost for the processing of the Special Use Permit. Each lease designated one person as the responsible permittee and entitled the party to trap a specific geographical area for one season. This individual was permitted to have helper(s) or substitute trappers if necessary (e.g. in cases of illness). Leases were transferable to other parties upon notification and approval of the Superintendent. Trappers were required to have valid state trapping license.

The earliest postmark date of the application served as a final criteria when all other criteria (previous record) was considered equal.

REGULATIONS:

The park regulations are largely consistent with those of the state but include additional, more stringent, site-specific rules and regulations. These site specific rules are in Appendix B.

REPORTING REQUIREMENTS:

Each trapper permittee was required to maintain activity records for the season, and to provide the park with harvest information within 30 days after the close of the current season. See Appendix A.

ENFORCEMENT:

Park personnel enforced the trapping rules and regulations by regular patrols in field. If the trapper permittee conducted an effective harvest within the conditions of the lease for the season, the applicant could apply for the lease for the following season without competition.

AREAS LEASED:

Of the 9,504 acres in the Barataria Preserve Unit, up to 5,625 acres were leased to trappers in any one season. Over 83 per cent of the trapping occurred on marsh vegetation which is dominated by spikerush (Eleocharis spp.) and bull tongue (Sagittaria lancifolia). Areas leased, along with associated acreages and ecotypes are listed below in Table 1. It is important to note that the areas to be leased were not static. They were subject to change based on current resource status, the acquisition of additional lands, public safety and for non-consumptive uses by the public.

TABLE 1

LAND TRACTS DESIGNATED FOR TRAPPING IN 1988-1989

<u>Tract Name</u>	<u>Acres</u>	<u>Ecotypes*</u>		
		<u>Marsh</u>	<u>BLW</u>	<u>CTS</u>
Bayou Lakes Lease	730	60%	15%	25%
Charity Lease	260	100%		
Guste Lease	605	100%		
Inez Lease	755	75%	10%	15%
Kenta Canal Lease	885	80%	10%	10%
Pipeline Lease	830	100%		
Segnette Lease	980	100%		
Twin Canals Lease	580	85%		15%
Total	5,625			

*Legend

BLW - Bottomland Woodlands

CTS - Cypress/Tupelo Swamp

HARVEST HISTORY

Table 2 reveals the harvest records obtained from the trapping seasons 1981-82 through 1988-89. The harvest data was generated from the permittees catch data submitted at the end of the season. The total acreage trapped in the Barataria Preserve Unit has increased through time as the park expanded and new trapping units were evaluated and opened. A decrease in acreage trapped occurred during the 1984-85 season and was a reflection of a substantial drop in participation by trappers brought on by two previous years of low prices for nutria fur (average \$2.60). Trap days are the number of traps run daily multiplied by the number of days trapped.

Nutria harvest can be closely correlated with number of traps set. It is important to note that the decline in the harvest of nutria cannot be used to conclude a drop in density. Quantity harvested is more closely related to the price of pelts, and nutria density is better gauged by condition of preferred vegetation (visible "eat-outs"). There is a strong correlation between harvest rates of nutria and the native furbearers. These assessments were generated by a report done by Robert G. Linscombe of Louisiana Wildlife and Fisheries.^{1/}

^{1/} Linscombe, Robert, et al. A report submitted to Jean Lafitte National Historical Park and Preserve under Cooperative Agreement No. CA 7029700002 by the Louisiana Department of Wildlife and Fisheries, January 1989.

TABLE 2

FUR HARVEST, ACRES TRAPPED, TRAP DAYS ^{1/}

JEAN LAFITTE NATIONAL HISTORICAL PARK AND PRESERVE

SEASON	NUTRIA	MUSKRAT	RACCOON	MINK	OTTER	TOTAL	ACRES TRAPPED	TRAP DAYS ^{2/}	SUCCESS RATIO TRAP DAYS/PELTS
1981-82	539	50	5	2	0	596	4,010	8,000	13.4
1982-83	540	76	4	3	1	624	4,180	5,950	9.5
1984-85	661	90	9	7	0	767	2,200	5,625	7.3
1985-86	3,330	8	54	27	2	3,421	5,242	25,210	7.4
1986-87	3,106	41	90	16	7	3,260	5,242	45,429	13.9
1987-88	905	7	15	9	3	939	5,089	14,141	15.1
1988-89	732	0	0	0	0	732	5,625	4,331	5.9
TOTALS ^{3/}	9,813	272	177	64	13	10,339		108,686	10.5
%	95%	2.8%	1.8%	.6%	.1%	100%			

1/ 1983-84 Data not available. No trappers listed for 1989-90. During that season, nutria prices were very low and only 1 permit was issued. Due to violations, this permit was revoked.

2/ Trap days are the number of traps run daily multiplied by the number of days trapped.

3/ Totals do not include 1989-90 season because a moratorium restricting trapping to nutria was in effect.

LAW AND POLICY

Management of the National Park System programs is guided by public laws, rules and regulations, and directives of the Secretary of the Interior. The following Federal and state laws and regulations apply to trapping within the Barataria Preserve Unit of Jean Lafitte National Historical Park and Preserve:

National Park Service Organic Act, 1916-- establishes the National Park Service.

Public Law 95-625, Section 905, 1978-- establishes Jean Lafitte National Historical Park and Preserve and provides for trapping (see Introduction, page 1).

36 CFR, Section 1.5-- Closures and Public Use Limits

36 CFR, Section 1.6-- Permits.

36 CFR, Section 1.7-- Public Notice.

36 CFR, Section 2.2-- Wildlife Protection (b) Hunting and Trapping.

Title 56, Part V, Louisiana State Statutes-- Trapping furbearing animals and alligators.

National Park Service policy originates in law established by the United States Congress. The following policies, plans and agreements apply to trapping management within the Barataria Preserve Unit:

National Park Service Management Policies, Chapter 4-- Natural Resource Management and Chapter 8, Use of the Parks.

National Park Service Natural Resource Management Guidelines, (in final preparation) NPS-77, Chapter 3:25.

1982 General Management Plan for the Jean Lafitte National Historical Park and Preserve

1982 Cooperative Agreement between the National Park Service and State of Louisiana for ceding of concurrent jurisdiction to the United States over lands within the exterior boundaries of the park.

In addition, the 1989 Judge's decision in Fund for Animals and Orleans Audubon Society v. Secretary of the Interior et al (Civil Action No. 87-5904) supports National Park Service actions related to trapping management in the Barataria Preserve Unit of the Jean Lafitte National Historical Park and Preserve.

Congress has stated in the enabling legislation of most units of the National Park System that they have their own particular purposes and objectives. Where Congress has provided specific guidance on particular management actions, it is to be followed, as in the case of Section 905 of P.L. 95-625 regarding trapping. Natural resources in park areas will be managed with a concern for fundamental ecological processes as well as for individual species and features. Interference with natural processes in park natural areas will be allowed only when directed by the Congress or to restore native ecosystem functioning that has been disrupted by human activity.

Hunting and trapping wildlife will be allowed in parks where such use is specifically authorized. In areas set aside with legal authorization for trapping of native wildlife, the National Park Service will still seek to perpetuate native animal life and to protect the integrity of natural ecosystems. Management programs directed toward the restoration and maintenance of habitats supporting such animals will be conducted through cooperative efforts with individual states.

The National Park Service will seek to perpetuate the native animal life as part of the natural ecosystems of parks. Species that have moved onto park lands as a result of human activities are not considered native. Non-native (exotic) species will not be allowed to displace native species if this displacement can be prevented by management. Management of populations of exotic animal species, up to and including eradication, will be undertaken wherever such species threaten park resources and when control is prudent and feasible. High priority will be given to the management of exotic species that have a substantial impact on park resources and that can reasonably be expected to be successfully controlled. Management means that may be used as necessary include habitat management and destruction of animals by National Park Service personnel or their authorized agents.

Firearms and motorized boats or other equipment will generally not be used for leased trapping activities due to the potential for resource damage, safety concerns, and conflict with other park uses. However, in taking safety and resource damage factors into consideration, the Superintendent can, on a case by case basis, authorize the restricted use of motorized boats.

MANAGEMENT ACTIONS

PERMIT LEASE LOCATIONS, DESCRIPTIONS:

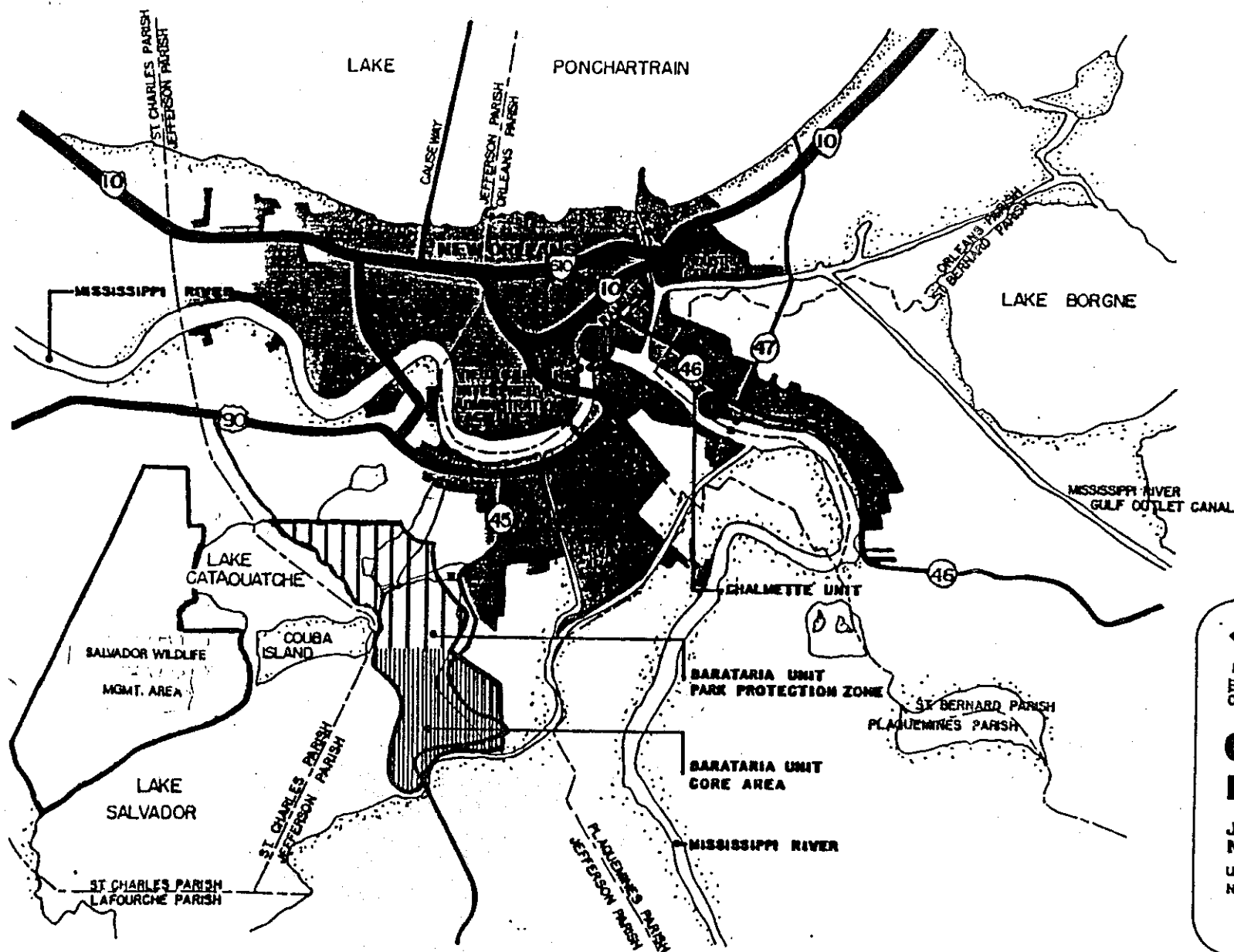
The permit lease locations are all upon Federally owned lands within the boundaries of the Barataria Preserve Unit, Jean Lafitte National Historical Park and Preserve. See Map 2, Trapping Leases. Under this trapping plan each lease is structured to follow known original property lines or physical features which are easily identifiable to both the trapper permittees and park personnel. These permit lease locations will remain flexible and as additional property is acquired, new permit leases may be established. The decision to lease the new areas will be made by the Superintendent based upon safety factors and resource conditions.

GENERAL PERMIT LEASE PROGRAM OPERATIONS:

Under this trapping plan a fixed fee system will be employed as the expected economic return to the trapper permittees is expected to be minimal and does not warrant a share arrangement or a bid solicitation. A basic administrative fee of \$50.00 will be charged for each permit activated in the program annually. If economic conditions warrant, the fee may be reduced.

General Operation Provisions for Leaseholders:

- Firearms may not be used during the taking of furbearing animals and may not be carried by the trapper/permittee.
- No motorized vessels in the marsh (Unless otherwise authorized by the Superintendent).
- No mechanical/motorized equipment may be employed to clean or clear marsh waterways (tranasses).
- Clearing of marsh waterways (tranasses) must not create connections with existing canals, bayous or waterways.
- No fires will be set.
- Trap sets will encourage safety and will not endanger trapper permittees, park employees or park visitors.
- All traps must be specifically marked to show ownership.
- Care will be taken to avoid or minimize the capture of non furbearers. Legally trapped animals will include nutria, muskrats, raccoons, mink, rabbits, otters, opossum.



PARK UNITS



MAJOR ROAD CORRIDOR



FERRY CROSSINGS



NORTH

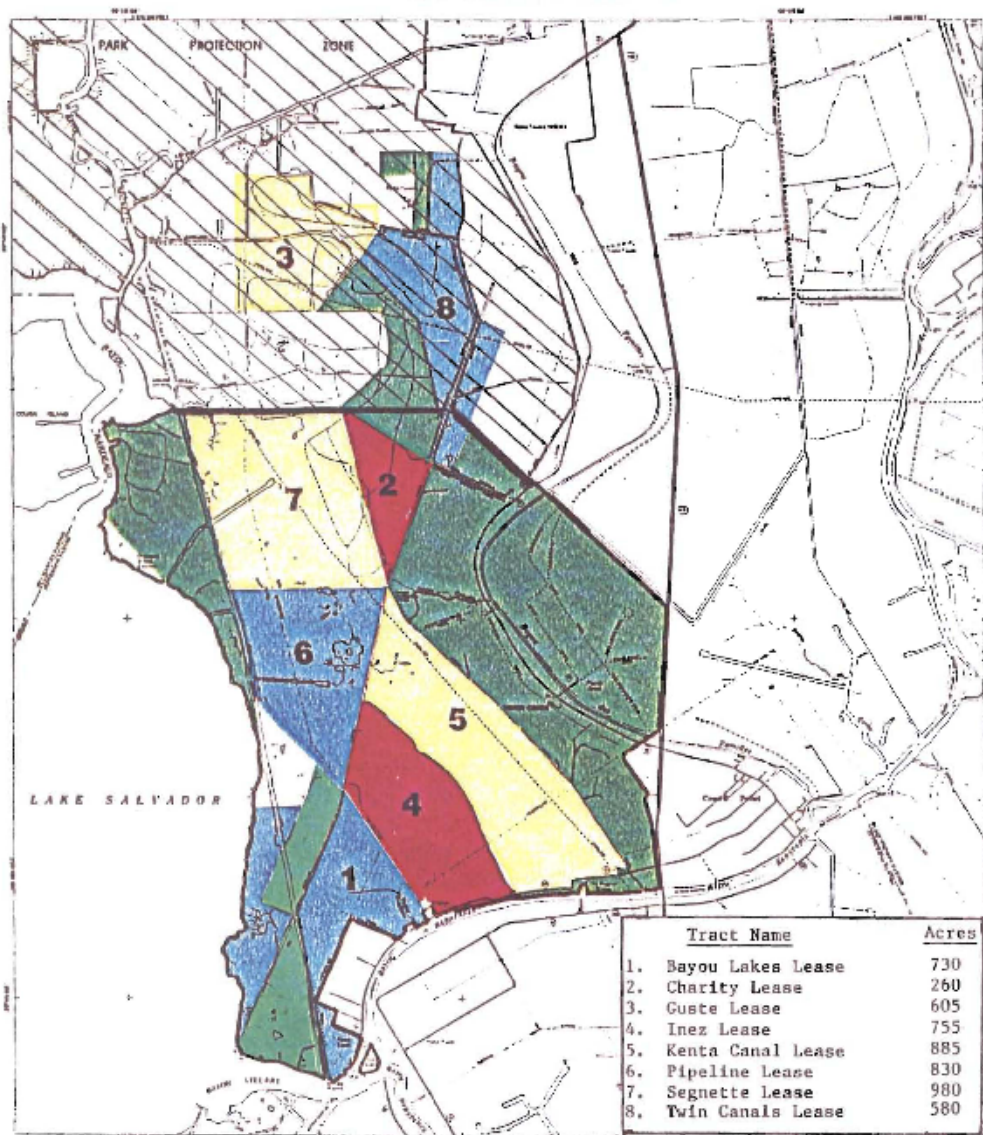
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GENERAL LOCATION MAP

JEAN LAFITTE
NATIONAL HISTORICAL PARK
UNITED STATES DEPARTMENT OF THE INTERIOR /
NATIONAL PARK SERVICE

467 10033
DSC JUN 82

BARATARIA TRAPPING LEASES



Barataria Preserve Unit
Jean Lafitte NHP&P

- All trap sets will be inspected within a 24-hour period by the trapper. Anytime this is not possible all individual traps will be closed.
- All live trapped target animals will be killed immediately.
- No animal carcasses will be disposed of within the boundaries of the Preserve.
- Vegetative material (live or dead) cannot be manipulated in the trapping process.
- Camouflaging traps or trap sets is not permitted.
- Traps may be placed and opened the day prior to the opening of the season. The trapper may harvest the first day of the season and traps must be removed by the end of the last day of the trapping season.
- No traps may be set on the watercourse side of any levee, spoil bank or berm.
- No water set traps will be allowed because of visitor safety and to reduce the risks of trapping non furbearers.
- No bait shall be employed with any trap.
- The use of all traps/sets will be in total compliance with all applicable State and Federal regulations. State statutes will prevail except when Federal statutes are more stringent.
- Failure to comply with any of the above conditions or with the special conditions (noted on the first page of each permit) will result in the loss of trapping lease and potential confiscation of equipment.
- Additional regulations, not specific to trapping, are listed on the back of the Special Use Permit, Form 10-114.

TRAPPER PERMITTEE SELECTION CRITERIA:

The park will provide an application form for prospective applicants. The park will accept inquiries and applications from interested persons, and will select from prospective trapper permittees after considering the following criteria:

1. Applicant had legal trapping rights (documented) on the land prior to its acquisition by the park.
2. Applicant has notified the park in writing of their interest in securing a trapping permit.

3. Applicant has certifiable effective trapping experience of nutria.
4. Applicant has no record of significant wildlife violations, (e.g. poaching, either State or Federal illegal possession of game, fish, etc.).
5. Applicant has in possession the proper equipment and material to conduct effective trapping activities and furnishes the park with a written inventory.
6. Applicant understands and accepts all provisions and conditions of the park Trapping Program.
7. Applicant is not an employee of the park.

PERMITS AND PERMIT REVOCATION:

The trapper permittee will be issued a lease specific trapping permit (Appendix A, Form 10-114) for one season. This lease will be subject to an annual review. Upon the annual review, if the trapper permittee has had an effective harvest of nutria and followed the conditions of the lease for the season, the permittee may apply for the lease for the coming season without competition. Every 5 years, however, all leases will be re-evaluated and leased competitively. If the permittee chooses to apply for a second lease, re-application will be required and selection will be based on review of the above criteria. The earliest postmark date of the application will serve as a final criteria should all other criteria be considered equal.

REPORTING REQUIREMENTS:

Each trapper permittee will be required to maintain activity records for the season. The park will provide the form to be used for this purpose.

A. Reports:

Completed DAILY CATCH RECORD (Appendix A, Form R/M 002) shall be submitted to the park every 7 days during the trapping season.

B. Receipts:

A photocopy of all sales receipts shall be submitted to the park which includes number of pelts sold by grade - whole, dried or green, etc., and price received.

FIELD MONITORING ACTIVITIES:

Annually, the park will implement a field monitoring program to collect field data and information which will support trapping

management activities in the Barataria Preserve Unit. This will be done in conjunction with the Louisiana Department of Wildlife and Fisheries.

This program will include a series of over-flights of the Barataria Preserve Unit to make observations and to collect relative data as follows:

Middle to late November (prior to trapping season): Assess general conditions; marsh vegetation, surface water levels, animal population concentrations, etc.

Late December to early January (during trapping season): Observation of marsh conditions, primarily looking for areas of vegetation damage. These will be referenced on a map, and an on-site inspection will confirm location, record dominant vegetation type and other pertinent information, including measurements, photographs, etc. of each "eat-out".

Late February or after greenup (near closing of trapping season): Assess marsh conditions and locate any animal population concentrations. Observe and record all vegetation damaged sites. Determine if damage sites have increased, decreased or remained the same in number and/or size. Document those sites for on-site visitation to measure, mark, photograph, record conditions and determine need to establish exclosures.

Note: The February flight observations will be a major factor in determining if additional action or actions will be taken to reduce the nutria population that particular year. A vegetative monitoring program will be utilized to obtain data from vegetative transects.

Data collection surveys will continue throughout the remainder of the year to measure and photograph vegetation. This will include recovery surveys within damaged vegetation sites (eat-outs).

During the trapping season, the park will collect harvest data on a daily schedule. The daily census schedule of trapping leases will be selected randomly. Each active lease will be assigned a random number (random number table), and the daily schedule will be established by random selection from those numbers.

Trappers will be contacted in the field by National Park Service personnel to observe conditions of the trap line and trap sets. The purpose of this monitoring is to assure that the conditions of the lease permit are being followed. Should violations be observed, corrective action will be required immediately and written documentation (Form 10-343) will be completed.

A "TRAPPING CENSUS FIELD REPORT" will be completed each day and entered into a computer statistical program already in place.

CONTRACT TRAPPING:

While 95% of the harvest from traditional trapping is nutria, market conditions, low prices of nutria pelts, could make traditional trapping uneconomical during some years. Under this situation, reduced harvests of nutria from traditional trapping would be inadequate to control populations of this exotic animal. This would result in continuation of vegetative damage to the marsh.

In order to increase total nutria harvest to achieve an annual removal of 3,000 to 5,000 animals, an incentive is needed to encourage more nutria harvest. The method to be used will be a contract trapping program. Through this program, trappers would be paid to harvest nutria under U.S. Government regulations. Contract trapping would be more likely to occur outside the trapping season. The National Park Service will acquire a permit from the State to control nutria if conducted out of the regular trapping season. The National Park Service will also work with the State to utilize out of season pelts and carcasses. Contract trappers would do the following:

1. Trap and remove up to approximately 3,000 to 5,000 nutria (regardless of age or sex) from specified locations as directed within the Core area, Barataria Preserve Unit, Jean Lafitte National Historical Park and Preserve.
2. Employ an adequate number of qualified trappers and an acceptable number of traps to accomplish the task of removing substantial numbers of nutria.
3. Unless otherwise specified by the Superintendent, remove all trapped nutria from the Barataria Preserve Unit and utilize both the fur and the meat in accordance with applicable Louisiana State statutes.
4. Provide the National Park Service with adequate records including Special Use Permit (Form 10-14) to substantiate the number of harvested animals; the method of disposal of both fur (skins/hides) and meat, including monetary value received.

Activity locations and descriptions will not necessarily adhere to the trapping lease boundaries. Contract trapping activities will focus on locations where resource damage due to high concentrations of nutria are observed.

Details about the Contract Trapping Program are included in Appendix D, Technical Data Contract Trapping of Non-Native Furbearing Quadrupeds, Barataria Preserve Unit, Jean Lafitte National Historic Park and Preserve.

DIRECT REDUCTION CONTROL:

When conditions warrant, further control of nutria through direct reduction (shooting) by National Park Service staff from an airboat or other means could be authorized by the Superintendent. Conditions that would warrant direct reduction control would be based upon evidence of resource damage from high densities of nutria in localized areas, economic considerations and effectiveness. This action would most likely occur in mid to late winter when nutria are most visible. It would coincide with the latter half of the trapping season. At this time, the National Park Service would have adequate information to project remaining trapping harvest. This timely information would assist in making a prudent decision on further control through direct reduction.

This management approach has also been recommended by the Louisiana Department of Wildlife and Fisheries. A trapping and direct reduction control approach has been used for many years, by the state, at nearby Salvador Wildlife Management Area.

ANNUAL TRAPPING PROGRAM REPORT:

After the trapping season, field monitoring data and statistical data from the trapping season will be completed, evaluated and submitted to the Superintendent within 30 days of the close of the trapping season.

Included in this annual report will be a discussion of the following topics:

1. Hydrological/Meteorological conditions
2. General marsh vegetation conditions, including use of vegetation transects.
3. Furbearing quadruped species population concentrations based on observations from over-flights and data on marsh vegetation conditions.
4. Statistical report of trapping activities and results.
5. Park employee and visitor safety.
6. Comments from Trapper Permittee/Contract Trappers.

This report will also propose any recommendations for revisions or adjustments needed regarding monitoring, resource management, safety, the number of permit leases, traditional trapping, and/or contract trapping for the following trapping season.

These recommendations will be reviewed by the Superintendent who will determine if any adjustments to the trapping plan are necessary. Permittees will be contacted if any changes affect their operations.

LIST OF PREPARERS

NAME	RESPONSIBILITY	EDUCATION
Steve Hickman	Team Leader	B.S. Wildlife Management
George Neusanger	Trapping Plan, Biological Evaluation	Ph.D. Env. Science M.S. Science Ed. B.S. Biology
Jim Carson	Background Information, Map, Public Involvement	B.S. Env. Res.
Bobbi Simpson	Background Information, Map, Public Involvement	B.S. Resource Management
Joe Sovick	Compliance and Coordination	B.S. Biology
Milford Fletcher	Biological Review	Ph.D. Animal Ecology M.S. Plant Physiology B.S. Biology

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GLOSSARY

ANNUAL ADDENDUM: This portion of the document is the variable. It changes to reflect the annual variations in conditions, and other factors which directly affect trapping activities (e.g. lease boundary line alterations, species harvest limits, etc.).

FURBEARING ANIMAL: (non-game quadruped) Those mammal species whose pelts have commercial value. Some of the more commonly harvested species are:

<u>FAMILY</u>	<u>GENERAL SPECIES</u>	<u>(COMMON NAME)</u>
Canidae	<u>Urocyon cinereoargenteus</u>	Fox
Mustelidae	<u>Mustela vison</u>	Mink
Microtinae	<u>Ondatra zibethica</u>	Muskrat
Myocastoridae	<u>Myocastor coypus</u>	Nutria*
Didelphidae	<u>Didelphis virginiana</u>	Opposum
Mustelidae	<u>Lutra canadensis</u>	River Otter
Procyonidae	<u>Procyon lotor</u>	Raccoon

*Non-native species

This list is not intended to be all inclusive, but to serve as a sample listing of families and Genus/species.

INACTIVE DELTA: The area near the mouth of the Mississippi River where natural delta building processes no longer occur due to construction and operation of flood control and river navigation measures.

PARK: A general term for Jean Lafitte National Historical Park and Preserve, to include the management oriented members of the park staff (e.g. Superintendent, Assistant Superintendent, Chief, Division of Interpretation and Resource Management, Unit Manager - Barataria Preserve Unit).

QUALIFIED TRAPPER: An individual who meets the specific criteria deemed necessary and appropriate (by National Park Service officials) to conduct an acceptable trapping activity in compliance with all conditions, requirements, and rules imposed by the National Park Service.

SPECIAL USE PERMIT: The approved document (Appendix A, Form 10-114) which will serve as the trapping permit and which authorizes the trapper permittee to trap within the boundaries of the Barataria Preserve Unit.

SPECIFIC TRAPPING CONDITIONS (PROVISIONS): Permit requirements or stipulations which may apply to a specific permit area or condition.

TRAPPER IDENTIFICATION MARK: A required identification mark which is to be used by the trapper to identify his/her traps in the field.

TRAP OR TRAPPING DEVICE: The traps employed must fully comply with applicable State law.

APPENDIX A

FORMS

SPECIAL USE PERMIT: The trapping program requires the documentation of each individual permit lease and the individuals permitted to trap that lease. The approved document is the SPECIAL USE PERMIT (Appendix A, National Park Service Form 10-114)

TRAPPING CENSUS FIELD REPORT (Appendix A, Jean Lafitte National Historical Park and Preserve Form R/M 001): This is a park originated form to be used by the Biological Technicians to census the harvest of furbearing quadrupeds.

DAILY CATCH RECORD: (Appendix A, Jean Lafitte National Historical Park and Preserve Form R/M 002): This is a park originated informal statistical form to be used to summarize the activities of each trapper permittee.

Required statistics will include: Number of traps used, days trapped, animals harvested by species, etc.

TRAPPING SUMMARY SHEET (Appendix A, Jean Lafitte National Historical Park and Preserve Form R/M 003): This is a park originated form to be completed by the Natural Resource Management Specialist. Data to be taken from DAILY CATCH RECORD (Appendix A, Form R/M 002)

UNITED STATES DEPARTMENT OF THE INTERIOR
National Park Service

Special Use Permit

Name of Use _____

Date Permit Reviewed 19 _____
Reviewed 19 _____
Reviewed 19 _____
Expires 19 _____

Long Term _____

Short Term _____

Permit # - - - - -
Region Park Type No #

Name of Area

Name or Permittee of _____
Address Phone

is hereby authorized during the period from (Time _____ day _____ Month _____ 19 ____), through (Time _____ day _____ Month _____ 19 ____), to use the following described land or facilities in the above named area:

For the purpose(s) of:

Authorizing legislation or other authority (RE- NPS-53 Appendix 1):

NEPA Compliance: CATEGORICALLY EXCLUDED _____ EA/FONSI _____ EIS _____ OTHER APPROVED PLANS _____

PERFORMANCE BOND: Required _____ Not Required _____ Amount \$ _____

LIABILITY INSURANCE: Required _____ Not Required _____ Amount \$ _____

ISSUANCE of this permit is subject to the conditions on the reverse hereof and appended pages and when appropriate to the payment to the U.S. Dept. of the Interior, National Park Service of the sum of \$ _____

The undersigned hereby accepts this permit subject to the terms, covenants, obligations, and reservations, expressed or implied herein.

PERMITTEE _____
Signature Date

Authorizing Official _____
Signature Superintendent Date

Additional Authorizing Official _____
(If Required) Signature Title Date

FIELD REPORT .

Lease

[illegible]

Daily Catch Record

Trapping Lease

[illegible]

TRAPPING SUMMARY SHEET
BARATARIA UNIT
JEAN LAFITTE NATIONAL HISTORICAL PARK AND PRESERVE

TRAPPER: _____

PERMIT # _____

Number of days trapped: _____

Number of traps placed: _____

Number of Animals taken per species: _____

Nutria _____

Muskrats _____

Raccoons _____

Otters _____

Others: (Include non-target species accidentally taken)

Average price _____ finished _____ green _____

Success Ratio: Target species - (days X traps) = _____

APPENDIX B

JEAN LAFITTE NATIONAL HISTORICAL PARK & PRESERVE PREVIOUS SITE SPECIFIC TRAPPING REGULATIONS

- Firearms may not be used during the taking of furbearing animals. (non-game quadrupeds)
- No motorized vessels in the marsh.
- No mechanical/motorized equipment may be employed to clean or clear marsh waterways (tranasses).
- Clearing of marsh waterways (tranasses) must not create connections with existing canals, bayous or waterways.
- No fires will be set.
- All traps must be specifically marked to show ownership.
- Care will be taken to minimize the capture of non furbearers (i.e. birds). Legally trapped animals include nutria, muskrats, raccoons, mink, rabbits, otters, opossum.
- All trap sets will be inspected within a 24-hour period by the trapper.
- All live trapped target animals will be killed immediately.
- No animal carcasses will be disposed of except as directed.
- Vegetation or plant material cannot be used for the purpose of trapping (for support or camouflage).
- Traps may be placed and opened the day prior to the opening of the season. The trapper may harvest the first day of the season and traps must be removed within one day after season closure.
- No traps may be set on the watercourse side of any levee, spoil bank or berm.
- No bait shall be employed with any trap.
- Failure to comply with any of the above conditions or with the special conditions (noted on the first page of each permit) will result in the loss of trapping lease and potential confiscation of equipment.
- Additional regulations, not specific to trapping, are listed on the back of the Special Use Permit, Form 10-114.

APPENDIX C

RESPONSIBILITIES

Officials and individuals listed herein are responsible for the functions and activities described and indicated.

SUPERINTENDENT:

1. Approves Trapping Management Plan
2. Signs the individual trapping permits (Appendix A, Form 10-114)

CHIEF, INTERPRETATION AND RESOURCE MANAGEMENT:

1. Supervises the development and preparation of the Trapping Management Plan, Non-Native Species Management Addendum, annual addenda, and associated Environmental Package
2. Reviews and recommends individual permits (Appendix A, Form 10-114)

NATURAL RESOURCE MANAGEMENT SPECIALIST:

1. Maintains a listing of prospective candidates for trapping permits.
2. Collects and summarizes trapping statistics.
3. Reviews and evaluates trapper permittee performance and completes Trapping Summary Sheet (Appendix A, Form R/M 003).
4. Prepares draft annual addenda for review and approval.
5. Participates in field surveys, inspects trapper permittee activities and observes ecological conditions.
6. Establishes and monitors vegetative transects, exclosures, and plots to provide habitat information relative to marsh conditions.

UNIT MANAGER - BARATARIA:

Coordinates overall field operations at the Barataria Preserve Unit. Provides routine enforcement activities to protect natural resources and to assure public safety.

BIOLOGICAL TECHNICIANS:

1. Provide for field inspection/compliance activities.
2. Participates in field surveys, inspects permittee activities and observes ecological conditions, collect harvest data. Completes TRAPPING CENSUS-FIELD REPORT (Appendix A, Form R/M 001).
3. Monitors selected vegetation plots, maintains and monitors vegetation exclosures.

INDIVIDUAL TRAPPER PERMITTEE:

1. Participates in the program by adhering to and complying with all provisions, regulations and conditions relative to his/her specific permitted activities.
2. Insures that his/her equipment and materials are adequately marked with the specific identification mark, and in compliance with applicable laws and regulations.
3. Maintains and records trapping activities on DAILY CATCH RECORD (Appendix A, Form R/M 002).

APPENDIX D

TECHNICAL DATA CONTRACT TRAPPING OF NON-NATIVE FURBEARING QUADRUPED Barataria Preserve Unit JEAN LAFITTE NATIONAL HISTORICAL PARK AND PRESERVE

INTRODUCTION

Jean Lafitte National Historical Park and Preserve was created "In order to preserve for the education, inspiration and benefit of present and future generations significant examples of natural and historical resources of the Mississippi Delta region . . ."

The enabling legislation (Public Law 95-625) further directs the establishment of the Barataria Preserve Unit, an area of approximately 18,275 acres.

1. To achieve its preservation and protection goals, the National Park Service plans/intends to implement management activities directed at control (including eradication) of the nutria (*Myocastor coypus*), a non-native furbearing quadruped species.
2. Park Management has chosen to couple management of trapping, a legislatively authorized traditional use, with the control of the non-native nutria; however, there are times when several factors effecting the level of trapping activity for furbearing quadrupeds combine to limit and greatly reduce trapping results.

This document will provide a data base for the development of an action plan to reduce the population of non-native nutria during those seasons when trapping effort is insufficient to meet management goals.

SCOPE OF WORK

In general, the action will include the following tasks:

1. Trap and remove up to approximately 5,000 nutria regardless of age or sex from specified locations as directed within the core area, Barataria Preserve Unit, Jean Lafitte National Historical Park and Preserve.
2. Employ an adequate number of qualified trappers to accomplish the task of removing substantial numbers of nutria, regardless of age or sex.

3. Provide safe transportation for trappers and their equipment, complying with all appropriate Federal, State and local rules and regulations.
4. Remove all trapped nutria from the Barataria Preserve Unit and utilize both the fur and the meat in accordance with applicable Louisiana State statutes.
5. Provide the National Park Service with adequate records to substantiate the number of harvested animals, the method of disposal of both fur (skin/hides) and meat, including monetary value received.

The required work will provide the National Park Service with 1) a reduced nutria population, 2) increased nutria population dynamics information, 3) harvest and general market information, fur prices, meat prices, and 4) economic benefit and value to local private sector.

METHODOLOGY

This work is intended to be a single season operation within the Core Area, Barataria Preserve Unit, Jean Lafitte National Historical Park and Preserve to reduce the population numbers of the non-native nutria. The contractor is expected to provide their own personnel, equipment and transportation, and to carry out the trapping operation within the applicable Federal, State and local laws, rules and regulations, and those special conditions which are imposed by the park Superintendent.

The contractor is expected to provide required information and data on a daily basis and as otherwise requested.

PRODUCTS

1. Daily activity records, including trappers, harvested animals, etc.
2. Receipts and other forms relative to fur and meat sales, including product price information per unit

ALLOTTED FUNDS

Amount to be determined.

REVIEW

The operations will be under the direction of the Barataria Unit Manager, who will coordinate the gathering of statistical data from the trappers.

The National Park Service shall have a period of 30 days, after receipt of notification of work accomplished to inspect the trapping areas and to advise the contractor of any further action necessary (e.g. cleanup, equipment removal, etc.).

SCHEDULING

The project will begin within 15 days of the award of the contract, and trapping activities will cease on the closure of the Louisiana trapping season, which ends the last day of February.

PAYMENT

Payment will be made in accordance with the following schedule:

1. Payment per animal taken upon completion of 30 days of trapping operations, and the proper submission of an invoice by the contractor.
2. Final payment after completion of trapping operations and the proper submission of an invoice by the contractor.

SUPERVISION

The award of this contract shall be based, to a considerable extent, upon the evaluation by the National Park Service of the contractor's knowledge of trapping, the trapping market, and the ability to successfully market the animal products. Therefore, the National Park Service requires that the named contractor be continuously and directly responsible for overall work effort.

Actual field supervision will be the duty of the Biological Technicians. Their daily contacts with the contract personnel and their recommendations and suggestions will guide the work.

EVALUATION

A review board of National Park Service personnel will evaluate the contract proposals according to the following criteria:

1. Knowledge of and ability to carry out a trapping program.
2. Demonstrable ability to carry out an effective trapping program.
3. Demonstrable ability to successfully market the animal products.
4. Demonstrable ability to keep and maintain legible records.

PROPOSAL DATA

Proposals should include the number of trappers employed, the proposed number of traps to be used, and the proposed cost per animal taken.

JEAN LAFITTE NATIONAL HISTORICAL PARK AND PRESERVE

DECISION RECORD
AND
FINDING OF NO SIGNIFICANT IMPACT
FOR THE
TRAPPING MANAGEMENT PLAN
BARATARIA UNIT

INTRODUCTION:

The National Park Service is proposing to institute trapping regulations consistent with the mandate directed by the United States Congress in Public Law 95-625. The Trapping Management Plan will replace the current regulations which are in effect for the Barataria Unit. Trapping is considered to be a traditional use of the area and will encompass the taking of furbearing quadrupeds within the boundaries of the Barataria Unit, Jean Lafitte National Historical Park and Preserve. In accordance with the legislation, zones have been established where traditional trapping is prohibited for reasons of public safety. The zones where traditional trapping is prohibited are visitor use areas which encompass 3,879 acres, approximately 41% of the lands managed by the National Park Service in the Barataria Unit.

ANALYSIS:

The two objectives of the Trapping Management Plan are to regulate trapping in accordance with the Public Law 95-625 and to control nutria (Myocaster coypus), a non native furbearer. This exotic has been identified as the primary animal responsible for damage to the park environment through vegetation removal and replacement of native animal populations.

While the Trapping Management Plan provides for traditional trapping on 5,625 acres it also emphasizes the harvest of nutria.

One of the trapper permittee selection criterion considers effectiveness in harvesting nutria as a criterion for competitive and non-competitive lease renewal. This criterion was added as a result of public comments.

To further augment the harvest of nutria the National Park Service would pay trappers to harvest nutria under Contract Trapping. In addition to Contract Trapping, the Park Service Staff would be able to conduct direct reduction (shooting) of nutria.

The Trapping Management Plan also sets harvest goals for nutria. Based on consultation with the Louisiana Department of Wildlife and Fisheries an annual harvest of 3,000 to 5,000 nutria has been initially identified as the number of nutria that would be needed to be removed to control the population to prevent unacceptable resource damage to the park. Traditional trapping, contract trapping and direct reduction control would be used to achieve the

nutria harvest goals identified.

Water sets are prohibited. These are traps set in water or on the shoreline. Water sets have resulted in the trapping of an occasional shorebird. By prohibiting water sets the trapping of these non target species would be reduced. This prohibition would also reduce the potential for trapping of certain native furbearers.

In conjunction with the prohibition of water sets, the use of live vegetation or plant material to camouflage traps is prohibited as well as the use of bait. These conditions will tend to impede the capture of native furbearers and encourage the capture of nutria.

An expanded monitoring plan is incorporated into the Trapping Management Plan to insure that trappers comply with the regulations and that a consistent monitoring program for biological data would be obtained over a long period. The monitoring data would provide a basis for making adjustments in the trapping plan.

SUMMARY OF PUBLIC INVOLVEMENT:

The Proposed Trapping Management Plan/Environmental Assessment was released on August 15, 1990 for a 30-day public review. Additionally, the NPS held a public open house on 27 August, 1990.

Ten written comments were received at the conclusion of the review period. The review process brought out three major areas of concern. These dealt with:

1. the appropriateness of allowing trapping to occur in the Barataria Unit,
2. allowing for natural processes to control nutria, and
3. the incidental taking of native species.

These issues were addressed in the plan and further clarified in the analysis of comments.

The Louisiana Department of Wildlife and Fisheries was consulted during the preparation of the Proposed Trapping Management Plan. They reviewed the final draft as required by Public Law 95-625 and provided verbal approval of the plan.

SUMMARY OF ENVIRONMENTAL IMPACTS:

Implementation of the Trapping Management Plan is not expected to result in any significant impacts to the environment. The U.S. Fish and Wildlife Service has reviewed the plan and has issued a finding of no effect to listed species or critical habitat. No significant impacts were identified from the analysis of the public comments. A detailed discussion of environmental impacts is included in the environmental assessment.

JEAN LAFITTE NATIONAL HISTORICAL PARK AND PRESERVE

**ANALYSIS OF COMMENTS
on the
ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED TRAPPING MANAGEMENT PLAN**

SEPTEMBER 26, 1990

On August 15, 1990 the Proposed Trapping Plan/Environmental Assessment was distributed for public review. Approximately 130 copies of the document were mailed to interested Federal, State and local agencies as well as the public. The comment period closed on September 17, 1990.

The National Park Service also sponsored a public "Open House" which was advertised in the newspapers and held from 8 am to 5 pm on August 27, 1990. The "Open House" was held to provide an opportunity for the public to discuss the proposal with the National Park Service and to submit comments. Nine people attended the "Open House". The proposal was discussed and some of the discussions by the public included comments on the proposal. However, those that included comments in their discussions followed up with more detailed written comments.

This analysis of comments will be appended to the Environmental Assessment. A total of 10 comment letters were received and one petition. Following is a list of those who commented on the Proposed Trapping Plan/Environmental Assessment.

Federal Agencies

U.S. Fish and Wildlife Service
National Oceanic and Atmospheric Administration
Soil Conservation Service

Organizations

Orleans Audubon Society
Delta Chapter Sierra Club
Friends of Jean Laffite Park

Individuals

Barry Kohl
Alan Yedor
Frank Ehret
A.J. Planche Jr.

Petition

581 signatures primarily from students attending John Ehret High School.

Following is a summary of the substantive comments submitted during the public review comment period and responses.

ISSUE: APPROPRIATENESS OF TRAPPING IN JEAN LAFITTE NATIONAL HISTORICAL PARK AND PRESERVE

Comments:

Three comments questioned the appropriateness of allowing trapping in Jean Lafitte National Historical Park and Preserve. Two comments addressed the surplus of lands available for trapping within close proximity to New Orleans (250,000 acres within an eighty mile radius of New Orleans). Several parties felt closing the majority of the park for the benefit of eight trappers was not warranted.

Response:

Trapping is mandated under the park enabling legislation, Public Law 95-625 as follows:

"....Within the Barataria Marsh Unit, the Secretary shall permit hunting, fishing (including commercial fishing), and trapping in accordance with applicable Federal and State laws, except that within the core and on those lands acquired by the Secretary pursuant of section 902(c) of this title, he may designate zones where and establish periods when no hunting, fishing, or trapping shall be permitted for reason of public safety. Except in emergencies, any regulations of the Secretary promulgated under this section shall be put into effect only after consultation with the appropriate fish and game agency of Louisiana."

Whether or not to allow trapping is not discretionary on the part of the National Park Service other than for reasons of public safety or severe environmental conditions. Of the 9,504 acres in the Barataria Unit managed by the National Park Service 3,879 acres (41%) have been zoned under the trapping plan as being closed to traditional trapping for reasons of visitor safety. In order for trapping to be prohibited entirely throughout the Barataria Unit, Congressional action would be required to remove authorization for trapping.

ISSUE: LET NATURAL PROCESSES CONTROL NUTRIA POPULATION

Comments:

Five parties expressed an interest in having natural processes control nutria populations (ie. alligators, freezes, etc.). Of the five comments, three parties were concerned about the condition/health of the alligator population.

Response:

The proposed trapping plan provides the opportunity to merge a congressionally mandated activity with resource management needs (managing alien species and overgrazing of vegetation). After weighing limited options, as a land management agency the National Park Service feels that the trapping of nutria is the most prudent and expedient method for assuring nutria control. Our records reveal a trend towards rapidly expanding "eatouts" (exposed areas due to excessive grazing), from approximately 45 acres in 1988 to 247 acres in 1990. Since "natural processes" (alligator predation, intense winter freezing) were occurring during this period and the "eatouts" or damaged areas grew in volume over 500%, the "natural process" was inadequate for effective reduction of nutria numbers.

The National Park Service recognizes the importance of alligators in the natural ecosystem and their role in reducing numbers of nutria. However, predation of nutria by alligators is not adequate to control nutria. The National Park Service has no plan to harvest alligators or their eggs. Nutria are an unnatural part of the system and cannot be sustained to enhance the alligator population.¹ Management activities will promote the eventual progression towards alligator numbers fluctuating according to availability of native habitat and native prey species.

ISSUE: IMPACTS OF TRAPPING ON NATIVE SPECIES

Comments:

Five comments were submitted regarding concerns for native species caught in the trapping process. Several of these five comments noted concern for the declining numbers of native species. One commentor expressed concern that trapping would make native furbearers more nocturnal and secretive and less likely to be viewed by the park visitor.

Response:

One of the park's management objectives is to reduce the numbers of nutria so that the damaged habitat will recover and potentially sustain greater numbers of native species. The proposed plan encourages targeted trapping of nutria. Knowledge of furbearer behavior has influenced the development of the terms and conditions of the special use permit/lease. The following three proposed restrictions regarding how and where traps may be set are designed to trap predominantly nutria.

1. No water set traps will be allowed because of visitor safety and to reduce the risks of trapping non-furbearers (as well as some native furbearers).

¹Management Policies, U.S. Department of the Interior, National Park Service, 1988, Chapter 4:11,12.

2. Live vegetation or plant material cannot be used for the purpose of supporting or camouflaging traps or trap sets.
3. No bait shall be employed with any trap.

These conditions are more restrictive than in effect under the previous trapping plan and, as aforementioned, bias capture towards nutria. To effectively trap native furbearers requires at least one of the above practices (water placement of trap, baiting of traps, and/or camouflaging trap).

To further promote compliance a specific condition has been introduced to curtail trapping activities which do not conform to regulations or permit conditions. "Failure to comply with any of the above conditions or with the special conditions will result in the loss of trapping lease and potential confiscation of equipment."²

Another approach introduced in the proposed plan as a means to specifically target nutria is Direct Reduction. This activity clearly excludes native species from reduction efforts. However, some concern was also expressed about this approach. Two commentors expressed concern that direct reduction could impact visitor safety. To insure visitor safety, direct reduction would be conducted by National Park Service employees. One commentor expressed concern about the impact of lead from bullets resulting from shooting nutria. The limited amount of lead from direct reduction activities is not considered to have an impact on vegetation, wildlife or water quality.

Traditional trapping is not considered to result in less wildlife viewing by the public. This is also based on conversations with the US Fish and Wildlife Service. It is important to recognize that traditional trapping would not occur in areas where visitor use occurs (approximately 41% of the park). Additionally, if native animal behavior had such a reaction to trapping we could expect that the animals would be more likely to move into the areas of visitor use where trapping does not occur.

² Jean Lafitte National Historical Park and Preserve, Trapping Management Plan, page 12, Sept. 1990.

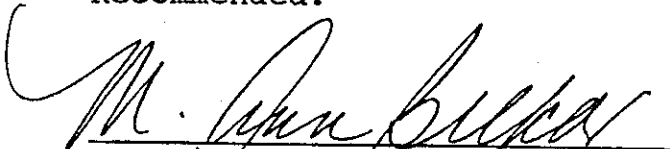
AGENCY DECISION:

The National Park Service will begin implementation of the Trapping Management Plan with the start of 1990/91 trapping season. The park will closely monitor the program during the first year to see if the achieved results are meeting the goals of management and make adjustments if needed.

CONCLUSION:

Based upon a review of the Trapping Management Plan, Environmental Assessment, consultation with other agencies, and public comments, implementation of the Trapping Management Plan will not constitute a major Federal action significantly affecting the human environment, and preparation of an environmental impact statement will not be necessary.

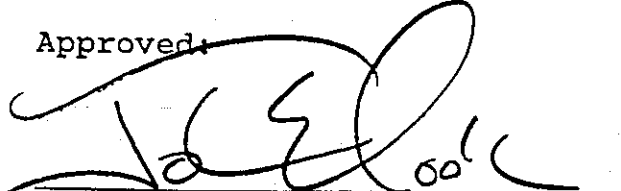
Recommended:



Superintendent
Jean Lafitte National Historical
Park and Preserve

10/2/90
Date

Approved:



Regional Director
Southwest Region

10/5/90
Date