



SIERRA CLUB MARIN GROUP

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Superintendent, Point Reyes National Seashore:

The Sierra Club, on behalf of its 7,000 Marin County members and its 750,000 members nationally, supports the 12/04 Point Reyes National Seashore (PRNS) Non-Native Deer Management Plan draft Environmental Impact Statement (dEIS) Preferred Alternative E.

The impact of invasive species on biodiversity and native and threatened species is a core issue for the Sierra Club. The National Invasive Species Council, which helps coordinate federal activities, notes that total costs of invasive species in the United States are more than \$100 billion each year and that invasive species impact nearly half of the threatened or endangered species. PRNS is rich in biological diversity with over 45% of North American avian species, nearly 18% of California's plant species, and 23 threatened and endangered species. If PRNS were to become a monoculture of invasive plants and animals, that would greatly diminish a biodiverse haven for wild creatures and humans while relegating the remnants of our native species to museums.

Use of ungulate habitat at PRNS is a zero-sum game with winners and losers. Any decision that PRNS makes, including no decision, will result in the death of animals; the only question is which animals. The environmental impacts from the No Action Alternative of letting invasive deer expand at PRNS would reduce habitats for and thus increase deaths of native black-tailed deer, native tule elk, endangered coho and steelhead, and riparian songbirds. These impacts on native, threatened and endangered species far outweigh the impacts from removal of a small portion of the large worldwide population of these deer.

The Sierra Club does not believe that an invasive deer species in PRNS increases biodiversity because of significant later consequences. The first introductions of yellow star thistle, west Nile virus, Scotch broom, and sudden oak death could have been said to momentarily increase biodiversity in California, but the subsequent impacts from these invasive species have caused huge economic and environmental damage. Goats introduced on San Clemente Island are responsible for the extinction of 8 endemic plant species. Rats introduced to Anacapa Island threatened several native species -- including the Xantus' murrelet.

The Sierra Club does not support the idea that the need to manage the invasive deer implies that all exotic species are inherently bad. In their native habitats these same species are usually well integrated into the local biological diversity.

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However, these otherwise harmless species, when removed by human action from their native habitat, sometimes find themselves with no natural limits to their populations and invade, displace and destroy native flora and fauna. It is when the behavior of these displaced species becomes aggressive and threatens their neighbors that the National Park is mandated to take action. A failure to take action on invasive deer threatens not only the native species being displaced but also the entire program to control invasives of all kinds.

National Parks have wide-open spaces and cannot feasibly keep an invasive species separate from the local species it is displacing. Zoos, of course, maintain biodiversity by keeping predator/invasive species in separate cages from the prey/refugee species, but National Parks must reduce or eliminate invasive populations in order to maintain diversity. These invasive deer cannot legally be removed or feasibly contained, and managing these deer at PRNS is not simple. If some females are contracepted and the population reduced below carrying capacity, the remaining females respond by greatly increasing their fertility; if some males are sterilized, the females respond by greatly increasing their estrous cycles for remaining males. Unless 100% of the deer are treated, populations will increase. But treating 100% of deer running wild over 70,000 acres is likely impossible, so some level of lethal removal will likely be required. Although these invasive deer were introduced to this area for the purpose of hunting, the Sierra Club agrees with the dEIS that hunting in PRNS would be inappropriate, although if State Fish and Game removed the limit on legal hunting outside the park, then that action could help control spread of the invasive deer beyond park boundaries.

The Sierra Club understands that lethal removal is controversial. Opposing lethal removal is an agreeable position to take, but the Sierra Club acknowledges that maintaining a diverse ecosystem is a complex task in which all actions, including no-action, have to have both risks and benefits assessed. We believe that the dEIS does a reasonable job in this assessment by using local studies combined with studies elsewhere to draw logical conclusions about the impacts from the invasive deer on PRNS habitat, flora and fauna. We agree that the risks from not managing the deer far outweigh the risks of management. However disagreeable it is to kill any animal, protecting a fertile and complex genetic biodiversity is fundamental to National Parks. Allowing the invasive deer to expand does not account for the pain and suffering of native species that would be displaced and thus indirectly killed.

The Sierra Club supports the prioritization of contraception over lethal removal within the framework of a continued decline in population so that if new methods are discovered for feasible contraception, then the percentage of deer lethally removed would be lowered. However, PRNS should not divert dollars that could go to native and endangered species protection to attempt at any and all cost to avoid any lethal removal of invasive deer. The Sierra Club supports PRNS's proposal to explore all feasible contraception options, but we also encourage PRNS to set up a fund for contributions from individuals that could provide additional funds for research on contraception. The effectiveness of

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experimental contraceptive techniques must be measured against the standard of a constantly declining population. Invasive deer cannot be allowed to continue to expand in the hope that future contraceptive action may prove effective. Furthermore, for any wild free-ranging animal, trauma, injury and mortality result even from use of contraceptives. The Preferred Alternative's complete removal of invasive deer results in the lowest number of total deaths compared to Alternatives that only reduce populations, because allowing even a few invasive deer to remain and breed would require continued removal actions in the future and greatly increases the number of animals needed to be contracepted or lethally removed.

Therefore, to the extent that contraceptives prove unable to reduce populations, the Sierra Club understands that specially trained park sharpshooters with a mandate for only taking sure, euthanizing shots must be the backstop insuring the success of the invasive deer removal. We ask that special precautions be taken if lethal removal is undertaken to ensure minimum impact to native species, including use of non-lead bullets, and that both the lethal removal program and its participants be monitored to insure effectiveness and humaneness. The Sierra Club supports donation of deer meat, when feasible, to local charity dining facilities.

The Sierra Club does not support the idea that since there are already considerable numbers of non-native species (cattle) living in PRNS, then no action can be taken on any other non-native species (invasive deer) until the last cattle are removed. PRNS was established in part to allow the continuation of "cattle ranching and dairying" (not wild deer raising) for those willing to continue those operations after the ranches were purchased for incorporation into PRNS. The Sierra Club is well aware that cattle impact the environment, but those impacts are declining as PRNS works with cooperative ranchers towards more "sustainable" agriculture. Furthermore, management difficulties for domestic cattle are minimal compared to the great difficulty of managing wild, invasive deer.

The Sierra Club understands that there are no easy solutions to management of non-native deer. A March 20 editorial in the New York Times captured the essence of the dilemma: "*Unfortunately, deer contradict our innate assumption that only ugly creatures can be vermin...But wise conservation means looking at the environment as a whole - from the smallest wildflower on forest floor to the biggest brown-eyed herbivore. The whole system - not just the prettiest mammals - needs protection.*" The Sierra Club supports protecting the whole system and therefore supports the 12/04 PRNS Non-Native Deer Management Plan draft Environmental Impact Statement (dEIS) Preferred Alternative E.

Sincerely,



Gordon Bennett, Marin Group Chair