

NPCA NNDMP Final Comments

**Point Reyes National Seashore
Non-Native Deer Management Plan Comments**

**Submitted by
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on behalf of
National Parks Conservation Association
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The National Parks Conservation Association (NPCA) submits the following comments and suggestions to help guide the process of creating the Non-Native Deer Management Plan (NNDMP) for Point Reyes National Seashore (PORE). NPCA is a non-profit organization with a primary mission to protect and enhance America's National Parks for present and future generations. As the nation's largest membership organization dedicated solely to national parks, we represent a broad array of existing and potential park users. We have more than 300,000 members nationwide, with more than 40,000 members in the state of California.

NPCA would first like to recognize the excellent work of the National Park Service (NPS) in the overall management of this unit to date. Having been established in 1962 to "preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped," we feel that the management of PORE has generally been successful in serving the various stakeholders and user groups the park's enabling legislation intended it for.

NPCA supports PORE's proactive approach in developing the NNDMP, as past management of the non-native deer (NND) did not involve the breadth and depth of analysis, both scientific and park management, which this plan displays. Because of the NND's expansive nature, the known and anticipated disruption they cause to PORE's native ecosystem, and the NPS mandate to protect and restore native ecosystems (*Management Policies*, Executive Order 13112), NPCA believes that the park must adopt a plan that can address the above issues thru a plan based on its human and financial resources.

Therefore, Alternative A/The No-Action Alternative would be ruled out since it does not contribute to the NPS mandate to remove non-native species. NPCA acknowledges that even though some analysis and modeling of the NND is based on deer data outside PORE, this is not ground to discredit the findings as it applies to PORE and the pursuit of an action alternative. It is only a matter of time, if not acted upon, that the park will be forced to take a reactive stance in managing the NND. PORE must have a roadmap to deal with these ever-expanding species.

Currently, both species of NND are:

- **Disruptive to natural ecosystem, which will increase the risk and probability of a future crisis situation, perhaps irreparable.** These NND eat

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more than 1 ton of forage a day (this will mean competition for food with native tule elk and black-tailed deer, especially during the dry season). Unacceptable high levels of congregation in riparian and woodland habitat by NND have the potential to negatively affect endangered species, such as red-legged frog and Coho Salmon. We ask that PORE consider visitor safety in adopting an alternative, as fallow deer are known to be very aggressive to other wildlife and potentially to, as their population and geographic range grows, park visitors.

- **Financial burden for NPS, ranchers, and community at large.** Some ranchers spend up to \$4K repairing damage caused by deer. When the geographic range of the NND expands, this financial burden will also carry. Relating to PORE, as long as the NND exist, there are infinite staff time and resource costs for monitoring disease/spread of disease in NND.

NPCA supports the need to take action in Alternatives B and C, however both fall short in adequately addressing control (i.e. deer that will eventually leave the park as time increases), known negative impact of NND to native habitats, and perhaps most important in overall park management: minimizing long-term diversion of staff time and Seashore resources from other resource management projects. By taking into account other projects in resource management, and also other areas in the PORE's operations that fulfill the mission of the park (e.g. interpretation), we recommend PORE adopt an eradication alternative, as too much human and financial resources are consumed by both Alternatives B and C over the long run, given each has no time limit. Because axis deer breed year-round and as early as the age of 4 months, plans to successfully contracept females of this species appear less feasible.

Considering eradication is the end goal over the same time period, NPCA supports Alternative D. Alternative D, compared to the preferred Alternative E, is less painful/and one can argue less cruel to the deer, more manageable than contraception procedure (i.e. capture/immobilize, inject contraceptive, tag deer for monitoring), safer for PORE staff (risk of injury from struggling deer and aerial net gunning), and less expensive (D costs \$300/animal, and E costs \$3,000/animal).

NPCA would recommend that PORE devise a detailed plan for Alternative D, outlining the logistics for the process, from sharpshooter training to removal of deer, and alternatives within, taking into account any roadblocks, such as the monitoring of the deer.

Thank you in advance for this opportunity to contribute to the planning process at PORE. NPCA looks forward to working further with NPS and other stakeholders to develop a NNDMP that will guide non-native species management for years to come and protect the park for future generations.