Alternatives Workshop and Public Comments on the Draft Alternatives Report

for the
Rocky Mountain National Park
Elk and Vegetation Management Plan/
Environmental Impact Statement

Department of the Interior
National Park Service

Prepared by

PARSONS
Denver, Colorado

November 2004

This Page Intentionally Blank

TABLE OF CONTENTS

This Page Intentionally Blank

INTRODUCTION

BACKGROUND

The National Park Service (NPS) published a Notice of Intent to prepare an environmental impact statement (EIS) for the Rocky Mountain National Park Elk and Vegetation Management Plan in the *Federal Register* on May 29, 2003. The National Park Service and partners in adjacent areas developed alternatives for managing elk and vegetation in and around Rocky Mountain National Park in Colorado. The goal of the plan is to reduce the impacts of elk on vegetation, reduce conflicts between people and elk, and restore the natural range of variability in both the elk population and affected plant communities to the extent possible. The EIS will evaluate the effects of a range of management alternatives on the natural and human environments. As the lead agency in this effort, the National Park Service solicited input from the public regarding the draft alternatives that were developed. This information was gathered during a series of four public workshops and from opportunities to comment in a widely distributed newsletter, at the park's visitor centers, and on the project's Internet site (http://www.nps.gov/romo/planning/elkvegetation/index.htm). The newsletter can be viewed or downloaded from the project's Internet site.

PURPOSE

The purpose of this report is to summarize the public response to the draft alternatives for the Elk and Vegetation Management Plan / Environmental Impact Statement. This report provides information about public perceptions related to the general themes of the alternatives, the adequacy of the range of alternatives, and what the public viewed as the pros and cons of the draft alternatives. The information gathered will be used to assist in fine-tuning the alternatives prior to evaluation in the EIS.

This report describes how the alternatives were communicated to the public, how comments were collected, and the process used to evaluate the comments received. Summaries of the public comments, with discussions of both the adequacy of the range of alternatives and a presentation of the substantive comments received, are presented in Tables 5 through 13. Appendix A contains a copy of the Public Comment Form that was distributed with the newsletter.

This report will help the interagency EIS team (IET) determine whether additional alternatives or modifications to the alternatives previously developed are needed. Additionally, review of the alternative comments will support the analytical phase of the draft EIS.

PRESENTATION OF DRAFT ALTERNATIVES TO THE PUBLIC

The draft alternatives were presented to the public in the summer 2004 newsletter, which summarized the initial project scoping and described the draft alternatives, and at the four alternative workshops that were held in the region. The newsletter was made available on August 4, 2004, by direct mail and also was distributed at Rocky Mountain National Park visitor centers, the Moraine Park Museum, and the Estes Park public library.

The alternative workshops were held between August 16 and 23, 2004, at the locations, dates, and times identified in the table below. The table also presents the number of attendees at each workshop.

TABLE 1: DRAFT ALTERNATIVE WORKSHOP LOCATIONS AND ATTENDANCE

Town	Where	When	No. of Attendees
Estes Park	Holiday Inn 101 South St. Vrain Avenue	August 16, 2004 6:00pm to 8:30pm	53
Boulder	Marriott Boulder 2660 Canyon Boulevard	August 17, 2004 6:00pm to 8:30pm	25
Grand Lake	Grand Lake Lodge 15500 U.S. Highway 34	August 18, 2004 6:00pm to 8:30pm	18
Loveland	Pulliam Community Building 545 North Cleveland Avenue	August 23, 2004 6:00pm to 8:30pm	31

The public was asked to submit comments on the draft alternatives by September 13, 2004. In total, 1,054 comments were received. In some cases, multiple comments were contained in a single document, while others were the result of a compilation of discussion items at the public workshops. The analysis of comments in this report summarizes the concepts represented by the comments. It does not tally the number of comments per alternative because the content of the comment was deemed to be the important factor rather than the number of times that particular perspective was expressed. For example, if 100 commenters made a similar substantive statement regarding Alternative A, that statement was reported once and given equal standing with another substantive comment that only was made once.

Table 2 presents general information about the sources of alternative comments. The 127 attendees at the public alternative workshops provided valuable input, including identification of numerous pros and cons of the alternatives. Among the 132 documents submitted via the comment forms or in letters, many contained multiple comments. Similarly, many responses (156) submitted by the public via the National Park Service planning website (http://planning.nps.gov/parkweb/comments.cfm?RecordID=153) provided several comments in each submittal.

TABLE 2: COMMENT ORIGINS

Source of Comment	No. of Respondents
Public meetings	127 attendees
Comment forms/letters	132 documents
Electronic submittals	156 documents

Table 3 presents a list of the agencies, organization, and businesses that submitted comments on the draft alternatives.

TABLE 3: AGENCIES, ORGANIZATIONS, AND BUSINESSES THAT SUBMITTED WRITTEN COMMENTS

A. J. Brink Outfitters	Dabkowski International
Colorado Wildlife Alliance	Humane Society of the United States
Colorado Woolgrowers Association	Jews of the Earth
Commanche Wilderness Outfitters, Inc.	Sierra Club, Colorado Chapter

THE CONTENT ANALYSIS PROCESS

Content analysis is a process used to compile and correlate similar public comments into a format that is useable by decision makers and the interagency EIS team (IET). Content analysis assists the IET in organizing, clarifying, and addressing technical information pursuant to National Environmental Policy Act (NEPA) regulations, and in the case of review of the draft EIS, identifying comments that require responses before issuing a final EIS.

The process includes four main components:

Development of a coding structure,

Creation of a Microsoft Excel comment spreadsheet for comment management,

Reading and coding of public comments letters, and

Preparation of a narrative summary.

Initially, a coding structure was developed to sort comments into logical groups by topics and issues. These codes were developed by identifying repeating patterns in the range of comments from the public meetings and grouping them according to subject matter. The

coding structure used was inclusive rather than restrictive, as an attempt was made to capture all comment content rather than to restrict or exclude any content.

Microsoft® Excel® was used to manage the comments. The full text of all substantive comments was stored in a spreadsheet file, and each comment was coded by topic and issue. Some of the information that was derived from the spreadsheet included sorting and reporting of comments by a particular topic or issue. The spreadsheet, in turn, was used to help construct this narrative summary.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters, electronic comments, and recorded flipchart comments from public meetings. All comments were read and analyzed, including those of a technical nature, opinions, feelings, and preferences for one management element or one alternative over another. Initially, comments recorded on flipcharts during the public meetings were entered into a spreadsheet according to which alternative or additional topic areas (tools, range of alternatives, or other) they addressed. Then each comment was assigned a code from 1 to 8, based on which general theme the comment referenced (see Table 4). For example, comments concerning impacts to moose populations and to vegetation both refer to an impact on resources and were coded as 4.

A second round of comment analysis combined similar or identical comments into a single concise comment that retained the intent of the original comments. This step condensed the list of comments to only unique comments pertaining to each alternative or additional topic area, to aid in sorting through the comments.

TABLE 4: ISSUE CODE DESCRIPTIONS

1	Public and agency relations or reaction
2	Park policy, mission, or operations
3	Cost of implementation or management
4	Impact on resources
5	Naturalness or ecological integrity
6	Practicality, efficiency, or efficacy
7	Economic impact
8	Visitors

Comments were sorted based on whether or not they were substantive (definitions of substantive and non-substantive comments are provided below). Only substantive comments on the draft alternatives were considered in this comment report. However, the public was asked to provide opinions regarding the pros and cons of the draft alternatives; thus numerous comments were marginally substantive. Many of these comments were retained to be inclusive of the public's opinions, even though the comment may fall outside the typical definition of substantive.

It should be further noted that this was not a vote-counting process. The emphasis in analysis and the resultant summary was on the content of a comment rather than the number of times a comment was received.

DEFINITION OF TERMS

Primary terms used in the document are defined below:

Topic: A category of subject matter. These categories were developed as a result of the scoping process and were used to track major subjects through the alternative comment analysis process. Example topics include "Alternative C Con," "Range of Alternatives," and "Tools." The topics are represented by the table titles in Tables 5 through 13.

Issue: Issues are subdivisions of topics. Each topic was separated into several issues to provide a better focus on the content of comments. The list of issues that were used to help code and organize the comments is presented in Table 4, above.

Substantive Comment: Substantive comments are defined as those that do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the draft environmental impact statement;
- Question, with reasonable basis, the adequacy of environmental analysis;
- Present reasonable alternatives other than those presented in the draft environmental impact statement; or
- Cause changes or revisions in the proposal.

In other words, they raise, debate, or question a point of fact or policy.

Non-Substantive Comment: Comments in favor of or against the proposed action or alternatives with no substantiating information, those that only agree or disagree with National Park Service NPS policy, and those that offered opinions or provided information not directly related to the issues or impact analysis were considered non-substantive comments. These comments provided a foundation in the workshop process and in the analysis of the draft alternatives, but were not included as unique comments in this summary.

SUMMARY OF PUBLIC COMMENTS ON THE ALTERNATIVES

Comment Summary

During the alternative comment period, which ended on September 13, 2004, 415 documents were received. Collectively, the documents contained 1,054 comments. Comments were received by letter, fax, and electronic mail; through the Internet site; recorded at public workshops; and on newsletter comment forms (an example comment form is included in Appendix A). Note that individuals present at meetings were each considered equivalent to a letter or electronic response in terms of the total document tally and were counted as such.

The comments received on the newletter comment response forms were primarily in response to two questions posed on the form:

- What are the pros and cons of the draft alternatives developed to date?
- Do you have any suggestions for other alternatives that would meet the project objectives?

Posters at the public workshops identified the workshop objectives as follows:

- To determine if an adequate range of alternatives has been considered.
- To identify the "pros" and "cons," including feasibility, effectiveness, constraints, and impacts of each alternative.

Although the questions on the comment form differ from the objectives presented at the workshop, the essence of each resulted in a set of comments that could be evaluated together.

In general, the public expressed appreciation for the opportunity to participate in the planning process. Comments mostly stated reasons why a person agreed or disagreed with a particular alternative. However, there were requests for additional information about particular alternatives and their costs, as well as numerous suggestions to alter the target elk population numbers or management tools for each alternative. The Comment Analysis section of this narrative provides more detail about the comments, including tables that list out the unique, concise comments for each of the topic groups.

COMMENT ANALYSIS

The Draft Alternatives

The following presents the titles and brief descriptions for each of the draft alternatives that were commented on by the public. The titles are used to aid in understanding which alternative is being referred to in the discussions and with respect to the comments presented in Tables 5 through 10.

Alternative A – No Action Alternative / Continue Current Management

Under this alternative, the elk population would be expected to fluctuate between 2,200 and 3,100 elk. The No Action Alternative would continue to implement the following NPS management actions:

- Monitor elk population and vegetation conditions;
- Use repellents and/or fencing in selected locations;
- Conduct poaching patrols in the park; and
- Observe elk for signs of chronic wasting disease.

Continuing actions taken by other agencies would include:

- The Colorado Division of Wildlife (CDOW) would manage elk outside the park in accordance with CWD policy;
- CDOW would manage elk outside the park consistent with CDOW herd management objectives as specified in individual herd management plans;
- Estes Valley Recreation and Parks District would use aversion techniques and materials as needed;
- Local police would control people when elk are present in Estes Park;
- Larimer County would monitor and manage vegetation in coordination with the noxious weed program;
- Larimer County land-use zoning would help maintain elk migration corridors;
- Larimer County and the Town of Estes Park would enforce fencing ordinances to protect elk migration corridors; and
- USFS would provide access to areas open to hunting in cooperation with the CDOW, consistent with management objectives in the Forest Plan.

Actions Common to All Action Alternatives (B through F)

Actions that would be common to all action alternatives (Alternatives B through F) include:

- Adaptive Management: This approach would allow modification of management

actions over time, within the framework of the selected alternative, and involves a cycle of monitoring, assessment, and decision making to allow managers to adjust strategies to better achieve the plan's objectives.

- Continued Hunting outside the Park: CDOW would use hunter harvest as much as possible to meet elk population objectives.
- Chronic Wasting Disease: Elk suspected of having contracted CWD would be selectively destroyed.
- Access Restriction: To protect public health and safety, public use may be restricted in selected locations within the park while management actions were occurring.
- USFS Habitat Improvement: Prescribed burning and thinning would continue, but not necessarily in coordination with the elk and vegetation management plan.
- Beaver Reintroduction: The beaver population in the park could be augmented after vegetation restoration was sufficient to support increased beaver herbivory.
- Monitoring: Elk population size, demographics, and distribution; vegetation conditions; visitor experience; beaver populations; and the potential for natural wolf recolonization would be monitored in addition to specific monitoring associated with particular alternatives.
- Enhanced Public Education: Public education efforts would increase to provide additional information about elk and their role in the ecosystem; how the management actions would affect elk, vegetation, other wildlife and visitors; and other topics relevant to the overall management of elk and vegetation.

Alternative B – Maximum Lethal Reduction of Elk Population

Under this alternative, elk would be lethally removed by agency staff, with aggressive reduction targets initially, followed by less intensive reduction to maintain target populations.

- The targeted range of elk population for this alternative would be 1,200 to 1,700, comprised of 200 to 400 elk that winter in the park and 1,000 to 1,300 that winter outside the park.

- NPS staff would cull approximately 300 cow elk in the park each year for the first four years of the plan and 65 cow elk each year for the remaining 16 years of the plan, with a total of about 2,260 elk killed in the park over the life of the plan. Culling would occur in strategically selected locations to reduce elk densities and redistribute elk to protect vegetation.

- Outside the park, hunter harvest or additional CDOW actions would be used to achieve elk population objectives as necessary.

- Elk could be culled by shooting by agency staff, captured and euthanized, or transported to a slaughter facility. The NPS would cull elk between November and late February.

(Note: fencing to protect and restore large areas of vegetation would not be needed under this alternative.)

Alternative C – Maximum Use of Elk Fertility Control

Alternative C involves the use of fertility control agents in the park to reduce the size of the elk herd to targeted levels within the natural range of variation, in combination with moderate levels of fencing to protect vegetation and promote restoration.

- The targeted range of population for this alternative would be 1,600 to 2,100, with 600 to 800 in the segment of the herd that winters in the park and 1,000 to 1,300 in the segment that winters outside the park.
- A multi-year reversible fertility control agent using a time-release compound to effectively inhibit reproduction in cow elk for multiple years (two, three, or possibly more years as formulations become available) would be used. Under this alternative option, approximately 400 elk would be treated each year throughout the life of the plan. The treatment period would be mid-July to early September, when the majority of the elk are in the park. The control agent would require Federal Drug Administration (FDA) approval to allow consumption of the meat. Cow elk would need to be captured, treated, and permanently marked to avoid retreating previously treated cows.
- Up to 3,000 acres would be fenced in the core winter range, Kawuneeche Valley, and alpine areas to protect aspen and willow. Fencing would remain in place for the life of the plan. Fencing could be applied outside the park to areas targeted for protection and restoration.
- Herding, hazing (e.g., rubber bullets, cracker shot, or other dispersal actions), and other aversion techniques would be used to ensure the movement of elk from the core winter range areas to traditional summer range areas in the park as needed, and to prevent excessive concentrations in unfenced areas.

Alternative D – Wolf Reintroduction in Rocky Mountain National Park

The NPS would reintroduce the gray wolf to Rocky Mountain National Park. This action would not entail a regional reintroduction; it would focus solely on reintroduction inside the park. Biologists believe that reintroduced wolves would disperse beyond the park boundaries and that conflicts with private land uses outside the park could occur.

- Fourteen to 20 wolves would be reintroduced.
- At this time, it is uncertain how the elk population would respond to the presence of

wolves. Further modeling and consultation with scientific experts is needed to estimate the effect of wolves on elk numbers and distribution. Full development and analysis of this alternative will be needed to predict the response of reintroduced wolves and corresponding response in elk.

- A fund to reimburse livestock owners for loss of livestock due to wolf predation could possibly be established.

(Note: fencing, herding, hazing, or other aversion techniques would not be used under this alternative.)

Alternative E – Moderate Reduction of Elk Using Public Marksmen in the Park

Alternative E relies on gradual lethal reduction over time to regulate the elk population and distribution. Inside the park, gradual reductions would be carried out under controlled conditions by members of the public who qualify as marksmen and are accompanied by NPS staff or contracted guides. Outside the park, hunter harvest and additional reductions implemented by CDOW, if needed, would be used to achieve the desired reduction target.

- The targeted range for the elk population would be 1,600 to 2,100, with 600 to 800 elk in the segment of the herd that winters in the park and 1,000 to 1,300 elk in the segment that winters outside the park.
- Members of the public could enter a drawing for the chance to remove elk from inside the park, accompanied by NPS staff or a contracted guide. These selected individuals would have to prove their ability to shoot at a defined "marksmen" level of skill.
- Approximately 70 cow elk would be removed in the park each year for 20 years. If the targeted number of elk are not removed by qualified public marksmen, NPS staff would shoot elk inside the park to reach the targeted population size.
- Outside the park, elk reductions would occur through hunter harvest and other CDOW actions as needed to reach target population levels.
- Culling activities would occur from November through February.
- Herding, hazing (e.g., rubber bullets, cracker shot, or other dispersal actions), and other aversion techniques would be used to to ensure the movement of elk off the core winter range areas to traditional summer range areas in the park as needed, and to prevent excessive concentrations in unfenced areas.
- Up to 2,200 acres would be fenced to protect willow and aspen in the core winter range, the Kawuneeche Valley, and alpine areas. Fencing could be applied outside the park to areas targeted for protection and restoration of vegetation.

Alternative F – Combination of Lethal Reduction and Fertility Control

This alternative would focus on using a variety of management tools to meet the plan's objectives and would maximize the flexibility to adjust the management methods used based

on the results of monitoring. The NPS would cull a high number of elk in the first five years of the plan to reduce the population size and then use fertility control treatments inside the park to maintain the population size over the remaining years of the plan. If fertility control methods are not successful in maintaining the elk population (e.g., because of an inability to treat the necessary number of elk), the NPS would cull elk as needed. Elk redistribution techniques and herding would be emphasized in this alternative to reduce concentrations of elk on the core winter range and to provide further protection for vegetation. The use of fences would be minimized under this alternative to the extent possible.

- The targeted range of elk population under this alternative would be 1,400 to 1,900, with 400 to 600 in the segment of the herd that winters in the park and 1,000 to 1,300 in the segment that winters outside the park.
- During the first five years of the plan, 140 elk would be shot each year by NPS staff inside the park (700 total over the life of the plan).
- Outside the park, elk reductions would occur through hunter harvest and other CDOW actions as needed to reach target population levels.
- After the initial reduction phase, fertility control methods would be used inside the park to maintain the population level for the remaining 15 years of the plan. Fertility control options could include the use of a single-year or multi-year reversible control method. The treatment period would be mid-July to early September, when the majority of the population is inside the park.
- Herding, hazing (e.g., rubber bullets, cracker shot, or other dispersal actions), and other aversion techniques would be used to ensure the movement of elk off the core winter range areas to traditional summer range areas in the park as needed, and to prevent excessive concentrations in unfenced areas.

If monitoring results indicate that objectives related to vegetation recovery are not being achieved, fences would be selectively installed on up to 2,200 acres on the core winter range, in the Kawuneeche Valley, and alpine areas. Fencing could be applied outside the park to areas targeted for protection and restoration of vegetation.

Alternative Pros and Cons

Tables 5 through 10 present a breakdown of what the public thought were the pros and cons of each of the draft alternatives. Similar comments were made addressing different alternatives because the alternatives have similar or identical components. For example, concerns about wasted meat were made for both Alternatives B and F. However, the subject of fencing was somewhat different. Only one comment in support of an alternative (Alternative D) was made with regard to fencing, while comments against an alternative because of fencing were made for each alternative with a fencing component (C, D, E, and F).

In several cases, comments are contradictory or reflected a respondent's misunderstanding of the alternative or issue. Some of the contradictions may simply be related to disagreement over the effects of a particular alternative or element of an alternative.

Alternative A – No Action Alternative / Continue Current Management

Note that the No Action Alternative was not discussed during the public workshops; thus comments regarding Alternative A were only received as a result in response to the newsletter and website. Because of this, there were very few comments regarding Alternative A. Table 4 lists these comments. Concerns about other agencies' involvement were the dominant theme in response to Alternative A.

TABLE 5: PROS AND CONS FOR ALTERNATIVE A

Issue	Pros	Cons
Public and agency relations or reaction	Opportunity to expand cooperative projects with other agencies Where do other agencies stand? The counties, CDOW need to be on board	
Naturalness or ecological integrity	Natural ecosystem processes will prevail if the elk are allowed to continue doing what they're doing – no action	CWD unknowns and the possibility of an elk population crash

Alternative B – Maximum Lethal Reduction of Elk Population

The comments regarding Alternative B are presented in Table 6. Comments in favor of the alternative predominantly addressed public/agency relations/reaction and supported its practicality/efficiency/efficacy. These included such comments as the alternative allows for the greatest flexibility, the alternative doesn't include public hunting in the park, and agency staff have the ability to pick out old and young animals. Comments opposing Alternative B addressed the issues of park policy/mission/operations, practicality/efficiency/efficacy, and visitors. These included that culling would be inconsistent with NPS purpose, culling does not include natural selection, and there would be large impacts on tourism.

TABLE 6: PROS AND CONS FOR ALTERNATIVE B

Issue	Pros	Cons
Public and agency relations or reaction	Costs and impacts on other landowners as elk move out	Negative public reaction to culling

TABLE 6: PROS AND CONS FOR ALTERNATIVE B

Issue	Pros	Cons
	Killing a cow would be killing a pregnant elk	Waste of meat if not donated or used
	Should be done in conjunction with hunting season outside the park	Could move elk to private land (fall hunts)
		Culling takes place too late to allow for hunting of elk outside RMNP
		Not humane
Park policy, mission, or operations	Good because it isn't public hunting	Inconsistent with NPS purpose
	Meets many plan objectives	Alternatives B,C,E,F need more detail
		Doesn't address the root problem
		What would be done with the carcasses?
		Large staff required
Cost of implementation or management	Uses agency staff – cost effective	Cost to staff and test elk is high
		Capturing elk is very expensive
Impact on resources	Positive vegetation response	Not sure how vegetation would respond
Naturalness or ecological integrity	Could pick out old and young – manage herd	No natural selection
		Doesn't change behavior of elk
		Not enough study done on proper population size
Practicality, efficiency, or efficacy	Provides definite results	Doesn't remove enough elk
	Could provide meat for consumption	Did not work in past – Yellowstone example
	Efficient method to reduce population	Doesn't address elk on west side of park
	Greatest flexibility and impact on controlling numbers	Culling won't work unless elk are relocated off private land
	Revegetation would take place quickly	Herding is difficult
		Only a short-term solution
		Reduced foraging pressure increases food supply – makes problem worse (i.e., compensatory response)
		The number of elk to be culled is too great

TABLE 6: PROS AND CONS FOR ALTERNATIVE B

Issue	Pros	Cons
		No end to need for culling (expense would continue)
Economic impact		Would have an adverse economic impact on businesses
Visitors		Impact tourism/visitor experience (reduced elk viewing opportunities) The park would need to be closed during culling actions There is a visitor safety risk

Alternative C – Maximum Use of Elk Fertility Control

Comments about Alternative C are presented in Table 7. Proponents of this alternative mentioned that fertility control is a flexible method that would be effective, this simulates more of a natural management, there would not be a risk of eliminating the herd, and no culling under this alternative is beneficial to the visitor experience. Opponents of this alternative commented that it is unnatural, there was concern that the meat couldn't be eaten without FDA approval, and there would be an economic impact due to the effects of this alternative on hunting.

TABLE 7: PROS AND CONS FOR ALTERNATIVE C

Issue	Pros	Cons
Public and agency relations or reaction	Not killing the elk would avoid political controversy	Marking treated elk would be negative aesthetically Fences would be unsightly Philosophical issues related to herding and hazing ethics
Park policy, mission, or operations	Population modeling needs to be better explained More consistent with NPS management than hunting	The safety of the fertility control drug for humans who might hunt and consume elk is unknown
Cost of implementation or management	Cheaper than other alternatives but fencing could be expensive	Too labor intensive which would result in a high cost of administering drug
Impact on resources		Fencing would affect other species Needlessly intrusive
Naturalness or ecological integrity	Improved knowledge of elk populations and population control More natural management	Fertility control would be unnatural Long-term effects on animals' health and potential side effects are unknown

TABLE 7: PROS AND CONS FOR ALTERNATIVE C

Issue	Pros	Cons
	Could allow better recovery from severe CWD loss and assist in CWD monitoring	Doesn't change elk behavior
	Fencing should not be permanent	Don't know long-term consequences
	Based on preliminary tests, there would be no behavioral effect	Genetic problems – unable to "select" target animal properly; interferes with natural selection
		Elk would be too stressed from treatment
		Possible environmental/ecological damage with release of a hormone into the environment
		Uncertainty regarding effects on elk population age structure
		Feasibility of this alternative is questionable
Practicality, efficiency, or efficacy	Fertility control method would be effective	Disparity between level of treatment and level of results; would not achieve objectives
	Flexible from a management perspective and it would be reversible	Temporary effect; not a long-term solution
	Herding could possibly yield some benefits without need for as large a reduction (e.g., more wary elk may not congregate as densely)	The need for repeat treatments would require too much management effort
	May want to consider a higher treatment rate	Invasiveness of treatment may cause elk to "hide"
		Meat could not be eaten unless FDA approves fertility control drug for human consumption
		The treatment would be experimental
		The population reduction effect would be too slow
		The vegetation response would be smaller than other alternatives
Economic impact		Would adversely affect hunters and hunting businesses
Visitors	Would not impact the visitor experience as much as shooting	

Alternative D – Wolf Reintroduction in Rocky Mountain National Park

Table 8 lists the comments related to draft Alternative D. Numerous comments were made for the majority of the issues as both pros and cons of Alternative D. Two comments regarding visitors were made in favor of Alternative D, saying it promoted public education and increased tourism. Practicality, efficiency, or efficacy had the most comments for the

pro and con comments for Alternative D. Proponents of Alternative D felt it assisted in elk dispersal, had the greatest long-term result, and would restore a missing component of the ecosystem. Opponents felt it "created more problems than it solved," was "impractical," and that Rocky Mountain National Park was too small for wolf reintroduction. This was reiterated by comments coded as park policy/missions/operations, as a comment suggested "wolves should be reintroduced at a landscape, not park, level." Economic impact to ranchers was also a concern. A recurring question that was asked was whether funding to mitigate impacts to livestock producers would be available.

TABLE 8: PROS AND CONS FOR ALTERNATIVE D

Issue	Pros	Cons
Public and agency relations or reaction	Would not have the negative aesthetic impacts of other alternatives (e.g., fences, marked elk)	Colorado is too densely populated [with people] for wolf reintroduction
	No shooting in the park would result in less controversy	Too challenging to coordinate with other agencies (CDOW is against wolf reintroduction)
	The initial number of wolves being introduced could be reduced	Concerns over wolves killing and not eating what they kill
		Endangered Species Act issues are unresolved
		Fear of wolves by public
		Wolves could jeopardize human safety
		Human violence against wolves would likely occur
		Wolf reintroduction is too politically controversial
		Concern that wolf reintroduction will substitute one problem for another
		Wolves may move elk onto private property and exacerbate situation for private landowners
Park policy, mission, or operations	This alternative is in line with the park mission	More detail regarding wolf reintroduction is needed
	Need to emphasize adaptive management more in Alternative D	Wolf reintroduction should be considered at the landscape and regional scales as opposed to area of RMNP
	Additional modeling and consultation with scientific experts is needed to determine the number of wolves to reintroduce	Current law prohibits control of introduced wolves
Cost of implementation or management	Cheapest alternative	Too expensive

TABLE 8: PROS AND CONS FOR ALTERNATIVE D

Issue	Pros	Cons
	High cost possibly compensated by increase in visitation to see wolves	
Impact on resources	Wolves would control coyote and moose populations	Could be too successful – wolves could reduce the elk population too much
	Vegetation would have an opportunity for increased growth as wolves disperse elk	Dogs and cats could become prey for wolves
	Meat [carcasses] would be available for other species	Wolf reintroduction could adversely affect other species (moose, bighorn sheep, lynx)
		What about rabies with wolves?
Naturalness or ecological integrity	Alters behavior of elk to reduce density and limit impact to resources in specific areas	Too many unknowns/uncertainty associated with wolf reintroduction
	Ecosystem balance would be enhanced with wolf reintroduction	Wolf dispersal of elk would push CWD into new areas
	No fencing would be used	
	This alternative would restore a native predator which would result in natural selection of elk by removing the sick elk	
	There will always be a refuge for the wolves in RMNP, even if some wolves get killed outside the park	
Practicality, efficiency, or efficacy	CDOW can shoot wolves if they do stray outside the park	Would RMNP provide adequate area and habitat for wolves?
	Better long-term results than other alternatives	Wolves would create more problems then they would solve
	Wolves would disperse elk herds	Need expert analysis of wolf spatial needs and human conflict
	Effective at controlling elk herbivory (proven) – Yellowstone reintroduction has been successful	Wolf reintroduction would be impractical
	Wolves are efficient predators, but would not "decimate" the elk population	RMNP is steep alpine terrain and is not suitable wolf habitat
	Wolves prefer elk as prey and would have a low impact on other animals	RMNP shouldn't be the first place to reintroduce wolves in Colorado.
	There is plenty of room around RMNP for wolves to survive	The Estes Valley is too urban to reintroduce wolves
	Wolves will possibly move elk into forests outside the park for hunters	Wolves will likely come anyway
		Herding would mimic the effect of wolves

TABLE 8: PROS AND CONS FOR ALTERNATIVE D

Issue	Pros	Cons
Economic impact	Wolves would be an economic benefit for local businesses	Dispersal of wolves into livestock and populated areas would cause conflicts with regional ranchers (weight loss of stressed livestock, stock kills)
	Private/public funds could be used to partially compensate private losses from wolf depredation	Need fund for potential impacts on ranchers/residential areas
Visitors	Wolf reintroduction would provide an opportunity to enhance education Wolf reintroduction would increase tourism	

Alternative E – Moderate Reduction of Elk Using Public Marksmen in the Park

The dominant issues for Alternative E were public and agency relations or reaction, park policy, mission, or operations, naturalness or ecological integrity, and practicality, efficiency, or efficacy, with the greatest number of comments associated with practicality, efficiency, or efficacy. Under this issue, proponents thought the alternative would be adaptive and flexible. An overriding theme of this alternative was whether the public should be allowed to "hunt" in the park. Note that although the use of public marksmen is not the same as hunting and the elk management plan strives to make the distinction clear, the public often thinks of it as hunting regardless of the actual differences. Some thought that because the marksmen would be guided by park staff and precedents have been set in other parks, that this was a positive element of the alternative, while others saw the use of marksmen as no different than traditional public hunting and thought that marksmen shouldn't be used in a national park.

TABLE 9: PROS AND CONS FOR ALTERNATIVE E

Issue	Pros	Cons
Public and agency relations or reaction	Humane method of reducing population	Not a "fair chase"; would be an elk slaughter
	Marksmen could haze elk out of the park to be hunted on USFS land	Could displace elk and elk-related problems to other areas
	Easier political buy-in with hunters	Gut piles would be inappropriate in a national park
	Hunters should have proficiency exams and move further back from main public-use areas	May encourage illegal hunting
	Hunting accident rate is low	Political and public fallout associated with hunting in a national park Concern for public safety

TABLE 9: PROS AND CONS FOR ALTERNATIVE E

Issue	Pros	Cons
Park policy, mission, or operations	Marksmen being guided by park staff would keep effort targeted to meet objectives	Park should do this, not private interests
	Open park to hunting where the elk herds are; doesn't have to be entire park	Added burden to NPS (planning/organization)
	Precedent exists – some hunting is allowed in other national parks	Hunting shouldn't take place in a national park
Cost of implementation or management	Lower cost than other alternatives	Who would bear cost of CWD test?
	Some people would pay well to "hunt" in the park.	
Impact on resources	Can be accomplished with little impact	Requires park personnel; too much demand of park staff resource
	Fencing could be positive if it allowed earlier restoration of beaver	
Naturalness or ecological integrity	Consistent with CWD management (because of fewer elk)	Carcasses not available for use by wildlife if removed
	Would cull the weakest herd members, although some disagreement that humans take the best	Requires fencing to meet vegetation objectives; fences could cause animal injury
	Hazing would maintain natural processes (i.e., elk behavior)	Fences aren't natural
	Hunting could be used to smooth out boom/bust cycles in elk	
	More natural than status quo	
Practicality, efficiency, or efficacy	The alternative would be adaptive and flexible	Humans would not take the weakest (no natural selection)
	Combine Alternative B with marksmen – do not use fencing	Elk population reduction is not high enough – not fast enough
	Shooting would disperse the elk herd	Disagree with having the public be qualified as marksmen
	Efficient, quick to achieve objectives	Will there be a lack of interest in shooting only selected elk such as cows?
	No disposal cost if marksmen allowed to keep carcass	There is less flexibility in this alternative to control outcome compared to Alternative B
	Relieves agency burden (e.g., CDOW)	
	Taking cows very effective for population reduction	
	Make marksmanship requirements minimal, no guide.	

TABLE 9: PROS AND CONS FOR ALTERNATIVE E

Issue	Pros	Cons
Economic impact	Good for contracted guides	Fencing would be expensive
	Revenue generating	Requires closing portions of park – negative impact on tourism
Visitors	Would attract people who want to be marksmen	Could cause elk to leave park and reduce visitor encounters with elk

Alternative F – Combination of Lethal Reduction and Fertility Control

Comments related to public and agency relations or reaction and park policy, mission, or operations had the greatest number of comments for both the pros and cons of this alternative. Table 10 lists the comments on this draft alternative. Emerging themes from the comments showed that proponents thought the alternative was "certain," "faster" than the other alternatives, and an effective combination of tools. Opponents were against using fertility drugs and thought that the methods were too controversial, there would be too much uncertainty associated with the long-term effects, and that the "methods are not aligned with park policy."

TABLE 10: PROS AND CONS FOR ALTERNATIVE F

Issues	Pros	Cons
Public and agency relations or reaction	Public more accepting due to less killing	Methods are too controversial – difficult to get widespread support Aesthetic/philosophical issues associated with several of the tools in this alternative Meat would be wasted if the fertility control drug was not approved by the FDA or if carcasses could not be donated because of CWD issues
Park policy, mission, or operations	This alternative is preferred since it doesn't include the use of marksmen Would provide good information for future management (CWD, etc.) Uses a combination of tools	Lack of specific tool use could be questioned by public – too complex Not aligned with park policy (i.e., natural regulation)
Cost of implementation or management	Less costly than other alternatives	Would be too expensive because of fertility control and fencing Would not be a source of revenue
Impact on resources		Fencing impacts other resources Cannot control impact of hazing on other resources

TABLE 10: PROS AND CONS FOR ALTERNATIVE F

Issues	Pros	Cons
Naturalness or ecological integrity	Less reliance on fencing than other alternatives	Managed herd would not retain its wildness
		Doesn't change elks' behavior
Practicality, efficiency, or efficacy	Better than fertility control alone	Uncertainties with use of untested fertility drugs
	Adaptable with availability of other tools	Not enough of an elk population reduction
	Results would be more certain	Difficult to monitor cause and effect of tools
	Could be used to test fertility control	Slower to achieve objectives than Alternative B
	Faster herd reduction	
	Less lethal take; yet most elk reduction	

Range of Alternatives

Table 11 presents the comments regarding the range of alternatives. A number of comments suggested adding more alternatives or combining different aspects of the existing alternatives. The subject of fencing is best represented in this table rather than with the individual alternatives, because it was an element of several alternatives.

Comments were analyzed to determine whether information presented to the public about the draft alternatives contained enough detail. A few areas where data were viewed as insufficient are listed here. Details about the type of fencing that would be used were requested. Comments were made that the alternatives don't address the elk population on the west side of the park or the root problem, suggesting that more information about these issues needs to be communicated to the public. Questions about side effects and long-term impacts of fertility drugs were raised. Others questioned whether the park is an adequate size for wolves, whether there would be a fund to mitigate for impacts on livestock producers, and expressed a desire for additional expert analysis of wolf spatial needs and human conflicts is needed. One comment regarding Alternative F stated that the alternative "doesn't seem to be enough," suggesting that more information about Alternative F's objectives should be included.

TABLE 11: COMMENTS GROUPED INTO THE RANGE OF ALTERNATIVES CATEGORY

Issue	Comment
Park policy, mission, or operations	Combine Alternatives B and D: too much uncertainty associated with wolf reintroduction , use minimum number of wolves for more management control
	Combine wolf reintroduction with increased hunting permits outside the park

TABLE 11: COMMENTS GROUPED INTO THE RANGE OF ALTERNATIVES CATEGORY

Issue	Comment
	Need more expert analysis of wolf spatial needs and conflicts with humans
	Use fewer wolves for reproduction control as new knowledge is obtained (dispersal (predators, hazing, etc.)
Impact on resources	Remove euthanasia and transport to slaughter from Alternative B (not culling methods)
	Promote sound livestock husbandry practices to prevent wolf depredation
	Use sterilized wolves to limit number and spread of wolves outside the park
	Administering contraceptives through feeding can spread CWD
Naturalness or ecological integrity	Remove fencing from Alternatives C, D, and F, or make it a second option if population management alone doesn't work
	Is the park large enough for wolves?
	Concerned over the type of fence to be used
Practicality, efficiency, or efficacy	Use culling for the first four years; then switch to a more natural method.
	First use culling/marksmen to reduce numbers then bring in wolves to maintain numbers
	Could do some fertility control along with other alternatives
	Contingent use of fencing should be stated in all alternatives
	There should be a fund to mitigate for impacts to livestock producers
	Support Alternatives B, D, and E – but request use of bows instead of marksmen because it is safer and more traditional
	Need an adaptive management alternative that would allow more flexible management to include future research implications and multiple management options
Visitors	Consider alternative with shooting/hunting taken out due to decrease in visitor experience and tourism impact

Management Tools

Table 12 reports the comments regarding additional suggestions of tools for elk and vegetation management. These included different suggestions for managing elk populations and for managing vegetation (e.g., noxious weed control or use controlled burns to manipulate vegetation as a food source).

In addition, several comments were made inquiring about the elk population targets that were identified, and several more comments suggested different elk population levels than called for in any of the alternatives. This suggests that the information presented to the public may not have enough detail with regard to the population modeling used to develop the alternatives.

TABLE 12: COMMENTS GROUPED INTO THE "TOOLS" CATEGORY

Issues	Comment
Park policy, mission, or operations	Get Colorado National Guard to cull
	Lessen fire suppression efforts, particularly in spring and fall
	Provide hay for elk in Moraine Park or other elk gathering places
	Additional elk habitat acquisition
Impact on resources	Beavers could mow down vegetation in fenced areas, but beavers could improve hydrology
	Developing fence designs could allow deer and keep out moose
	Redistribute elk to allow recovery of riparian areas only
	Create small earthen dams that simulate beaver dams
Naturalness or ecological integrity	Culling will provide CWD prevalence information sooner
	Don't want to hear sounds from hazing/herding activities in park
	Limit bull population to reduce dispersal of elk (for disease control)
	Use controlled burns to manipulate vegetation as a food source
Practicality, efficiency, or efficacy	Start by culling, but then plan to use wolves if wolves become established elsewhere in Colorado (either by recolonization or reintroduction elsewhere); could involve augmenting a small wolf population
	Elk could be rounded up after rut and auctioned, like buffalo in Custer State Park
	Use salt blocks with poison to reduce the population
	Vasectomies for bull elk as reproduction control – fewer animals to capture with greater effectiveness

Other Comments

Comments grouped into this topic section included those that did not refer to a specific alternative, the range of alternatives, management tool, or referred to issues outside the scope of the elk and vegetation management plan. Comments that reflected on actions common to all action alternatives were included here as well. Table 13 lists all of the unique comments for this topic.

The largest numbers of unique comments were made regarding park policy, mission, and operations. A number of comments focused on different aspects of the alternatives, such as time frame and how they should be presented in the final EIS. Some comments reflected about elk populations on other public and private lands and about public education. A few of the comments emphasized potential impacts to other species, such as moose and wolverines. Numerous comments focused on elk distribution, behavior, and whether they were overpopulated. Comments related to practicality, efficiency, and efficacy were wide-ranging, from wanting to keep motorized vehicle right of entry open for access to diseased

elk, to a call to stop building in the elk's habitat One comment mentioned that costs were not given for the alternatives, making it difficult to decide between them.

TABLE 13: COMMENTS GROUPED IN THE "OTHER" CATEGORY

Issues	Comment
Public and agency relations or reaction	Need more education for public – dispel fear of wolves
	In Estes Park, hunting is less effective now because elk are on private land
	Concern about increasing hunting outside (impact National Forest) recreational opportunities
	Need more access to private landowners
	Consider lengthening hunting season outside the park (Feb/Mar) and increasing number of permits
	Estes Park should not pay for others profit
Park policy, mission, or operations	Alternatives should consider immediacy and longevity
	Are there really too many elk? Need scientific sources
	EIS should clearly describe time frames in which alternatives would achieve objectives
	Alternatives should include additional sets of combinations
	Elk are at nuisance status
	Gross mismanagement of wildlife and vegetation up to now
	Monitoring is extremely important
	In Yellowstone, elk no longer congregate in lowlands; behavior can be changed without reducing numbers
	Need more law enforcement
	Decisions have been delayed too long
	Process should be done in context of NPS mandate (natural management)
	Do wolves that migrate into the park have different legal repercussions than reintroduced wolves, and can they be added to the alternatives?
	Private land tags only; tags should include Mary's Lake/East Portal
Cost of implementation or management	Consider selling meat to offset cost
	Cost is not mentioned in any of the alternatives for public to be able to take into consideration
Impact on resources	Address bull/cow ratio and bull destruction
	Carrying capacity
	Better fencing for domestic livestock from predators
	Need lower number's of elk removed
	Consider other large pending impacts – e.g., beetle kill
	Too many moose – possible future problem?
	To meet vegetation objectives, the park needs to lower elk numbers faster
	Reintroduce wolverines if there aren't any in the park

TABLE 13: COMMENTS GROUPED IN THE "OTHER" CATEGORY

Issues	Comment
	Not in favor of beaver reintroduction – would increase habitat and vegetation problems in future
Naturalness or ecological integrity	Don't see any elk near National Forest
	Changing elk behavior into smaller groups will reduce CWD
	Housing disrupts elk corridor so elk stay in same place
	Moose population is too high for managing natural conditions
	Must evaluate over larger landscapes, National Forests, North Park area
	Need more tolerance for wildlife
	Protect the scenery
	Too many elk in certain areas but not seen in others
	What about mange? Sign of overpopulation
	Who do the elk belong to?
	NO large-scale manipulation (farming) of meadows; allow for natural recovery.
Practicality, efficiency, or efficacy	Public option to have meat
	Reduce the number of bulls
	Set target numbers by vegetation response, not number of elk
	The real problem is elk numbers, not behavior
	Need a desired future condition and a timeframe in which to achieve it
	Over development in elk habitat needs to stop
Economic impact	Would like the right to shoot a wolf known to have killed livestock

CONCLUSION

In summary, public comments about the draft alternatives for the Rocky Mountain National Park Elk and Vegetation Management Plan/EIS were collected through public meetings, written comment forms, and electronic communication. The comments received were then analyzed for content. This analysis showed that the public desires additional information about the alternatives and is interested in creating different alternatives to some degree (see the Range of Alternatives section). Comments specifically about the draft alternatives showed members of the public supporting and disagreeing with the Alternatives B through F somewhat equally. There was no alternative that clearly stood out as receiving only favorable or unfavorable comments. Alternative A (the No Action Alternative) did not have many comments either for or against, primarily because it was not discussed in the draft alternative public workshops.

This Page Intentionally Blank

APPENDIX A

PUBLIC COMMENT FORM

This Page Intentionally Blank

Rocky Mountain National Park

National Park Service
U.S. Department of the Interior

Public Comment Form for Elk and Vegetation Management Plan and Environmental Impact Statement

DRAFT ALTERNATIVES

The summer 2004 newsletter from Rocky Mountain National Park provides information regarding the draft alternatives to manage elk and their habitat in and around the park. Keeping the plan's objectives in mind, what are the pros and cons of the draft alternatives developed to date? Do you have any suggestions for other alternatives that would meet the plan's objectives? (Use additional pages, if needed.)

_____

_____

_____

_____

_____

_____

_____

You can submit comments by several methods. **Comments must be received by September 13, 2004**.

- You can fold and return this form with your comments.
- You can send a letter to: Superintendent, Rocky Mountain National Park, Attn: Elk and Vegetation Management Plan, Estes Park CO 80517
- You can provide us with oral or written comments at one of the draft alternative workshops to be held in August 2004. Dates, locations, and times are listed in this newsletter and posted on the project Website, www.nps.gov/romo/planning/elkvegetation.
- You can submit comments electronically via the links on our Website at www.nps.gov/romo/planning/elkvegetation.
- You can hand-deliver written comments to the drop boxes at any of the park's visitor centers, the Moraine Park Museum, or the Estes Park public library.

Check below as applicable:

☐ Please add me to the elk and vegetation management plan mailing list.

☐ Please remove me from the mailing lists for this project.

Please provide your name and mailing address:

_____

_____

_____

☐ I prefer to receive electronic documents via e-mail _____.

☐ I will download my own copy of the newsletters/documents from the NPS Website.

☐ I will go to park headquarters or the library and read the copy on file there.

☐ I would like to receive printed versions of newsletters/documents.