

***REVIEW AND EVALUATION***

**“Lethal Deer Reduction Phase”**

***Final White-tailed Deer Management Implementation Plan***  
***For Valley Forge National Historical Park, 2010-2011***

**King of Prussia, PA**



**Submitted By**

**Robert N. Griffin**  
**Certified Wildlife Biologist**

**GRIFFIN WILDLIFE SERVICES**  
**Starkville, Mississippi**  
**February 2011**

## ***REVIEW AND EVALUATION***

### **“Lethal Deer Reduction Phase”**

#### **Final White-tailed Deer Management Implementation Plan**

#### **For Valley Forge National Historical Park, 2010-2011**

#### **King of Prussia, PA**

---

### **Introduction**

Valley Forge National Historical Park (NHP) was asked by then-Congressman Joe Sestak to use the services of an independent, outside consultant to evaluate and document the safe and humane nature of the deer removal field operation at the Park. The evaluated project is the lethal deer reduction phase outlined in the Final White-tailed Deer Management Plan/Environmental Impact Statement for Valley Forge National Historical Park and detailed in the Final White-tailed Deer Management Implementation Plan for Valley Forge National Historical Park, 2010-2011. The operation began November 2010 and is scheduled through March 2011. This document is provided to the Park Superintendent, Michael Caldwell, as an expert, written opinion on the professionalism, safety, and humane nature of the operation.

---

### **Purpose and Methods**

The Consultant served as an independent observer to evaluate the safety and humane nature of the deer removal project performed by an appointed team of USDA/APHIS/Wildlife Services field employees in coordination with Valley Forge NHP personnel. The Consultant reviewed the Final White-tailed Deer Management Plan/Environmental Impact Statement for Valley Forge National Historical Park and the Final White-tailed Deer Management Implementation Plan for Valley Forge National Historical Park, 2010-2011. A site visit was conducted on Valley Forge NHP to observe the operation on January 25-27, 2011. During the period from 9:00 PM through 6:00 AM on January 25-26, 2011 the Consultant attended the safety briefing, observed the sharpshooting activities, participated in the deer processing and data collection, and interviewed USDA/APHIS/Wildlife Services and Valley Forge NHP personnel in

attendance. The Consultant did not provide supervision, advice, or direction in any manner for this project, but served only as an observer. Below is a list of primary objectives for the Consultant during the review and evaluation of the project:

1. To determine if the Final White-tailed Deer Management Implementation Plan for Valley Forge National Historical Park, 2010-2011 appropriately and adequately addresses all normal and expected procedures pertaining to a safe and humane deer removal operation.
2. To determine if the sharpshooting operation by USDA/APHIS/Wildlife Services field employees complies with normal and expected procedures of a deer removal operation, as well as with all aspects of the safe and humane deer removal procedures as outlined in the Final White-tailed Deer Management Implementation Plan for Valley Forge National Historical Park, 2010-2011. Specifically of importance were a) safe firearms handling, b) safe shot selection, c) humane euthanasia and handling of deer, and d) communication and record keeping.
3. To determine if the levels of cooperation and coordination between Valley Forge NHP personnel and USDA/APHIS/Wildlife Services field employees engaged in the operation were appropriate and adequate to ensure a safe and humane operation.

---

## Findings

The findings of this review in order of the primary objectives presented above are discussed below:

**Objective 1 - To determine if the Final White-tailed Deer Management Implementation Plan for Valley Forge National Historical Park, 2010-2011 appropriately and adequately addresses all normal and expected procedures pertaining to a safe and humane deer removal operation.**

The Final White-tailed Deer Management Implementation Plan for Valley Forge National Historical Park, 2010-2011 is an impressive document that covers every contingency and conceivable variable. The document appears to leave nothing to chance. The safety briefing prior to the nightly operation followed the protocol outlined.

**Objective 2 - To determine if the sharpshooting operation by USDA/APHIS/Wildlife Services field employees complies with normal and expected procedures of a deer removal operation, as well as with all aspects of the safe and humane deer removal**

**procedures as outlined in the Final White-tailed Deer Management Implementation Plan for Valley Forge National Historical Park, 2010-2011**

**a) Safe firearms handling**

The Consultant was a witness to the inspection of the firearm, scope, and suppressor (Remington 700 VLS .243 Win # G6438064 with suppressor # 080915) prior to the operation and observed the handling of the firearm during the operation by two USDA/APHIS/Wildlife Services designated marksmen as Mobile Unit 1 team members. All rules of firearms safety were followed to the letter, including those specific to this operation as outlined in the Final White-tailed Deer Management Implementation Plan for Valley Forge National Historical Park, 2010-2011.

**b) Safe shot selection**

The Consultant observed a full night of field operations, riding alternately in the passenger compartment and the back bed of Mobile Unit 1, to observe the operation relative to shot selection resulting in the removal of 14 deer. The team followed every protocol for observing safe no-shoot zones, safe acquisition of targets, checking for persons or other animals, assurance of an adequate backstop, and final shot selection to the extreme. Several opportunities for shots were passed that probably would have been perfectly safe. All safety commands were followed, and each team member was alert at all times working as a unit.

**c) Humane euthanasia and handling of deer**

All observed removals of deer were performed humanely and with a high degree of integrity and compassion. Shot placement was appropriate in every case. When a deer was shot, the team member with the infrared scope observed the downed deer to detect any movement. Although rarely necessary, if head movement was observed, the team member called for another shot to humanely dispatch the animal. Only then did the team consider a shot at another deer.

There was only one shot taken that resulted in a miss. Even with a miss, the shot was safe from a human safety standpoint because of the restrictions in place to ensure safe shot selection with an adequate backstop. Following the apparent missed shot, two team members conducted a ground search for any evidence of a hit, while another team member observed the group of deer, including the missed animal, with the infrared scope until all team members declared the shot a miss. Removed deer were handled with respect, and all evidence at the site was removed or covered.

**d) Communication and record keeping**

The Valley Forge NHP employee accompanying the team remained in constant radio contact with Park Law Enforcement personnel, and all team members were familiar with and adhered to the protocol for stopping and resuming operations. On two occasions the operation was called to a temporary “stand down” due to traffic or other conditions in the Park. Once an “all clear” was given, the operation resumed. Every shot taken and the results of each shot were recorded on a data sheet by the Park employee, and the exact location of each deer removed was collected on a GPS unit.

**Objective 3 - To determine if the level of cooperation and coordination between Valley Forge NHP personnel and USDA/APHIS/Wildlife Services field employees engaged in the operation were appropriate and adequate to insure a safe and humane operation.**

The Consultant observed a high level of coordination and cooperation between the USDA/APHIS/Wildlife Services field employees and the Valley Forge NHP employees. This was apparent during the safety briefing, the removal operation, and the processing of removed deer. Team members worked as a unit where each person was aware of their respective duties, and everyone demonstrated a willingness to pitch in and cooperate when needed.

---

**Conclusion**

Based on the review of the Final White-tailed Deer Management Implementation Plan for Valley Forge National Historical Park, 2010-2011 and the site visit to observe the operation, it is the opinion of the Consultant that the lethal deer reduction phase on Valley Forge NHP meets or exceeds all expectations for such an operation. The Valley Forge NHP and USDA/APHIS/Wildlife Services agencies, along with all participants in the operation, are to be commended for their efforts and professionalism.

\_\_\_\_\_/\_\_\_\_\_  
Submitted by: Date:  
Robert N. Griffin, Certified Wildlife Biologist  
Griffin Wildlife Services