

## Briefing Statement

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**Bureau:** National Park Service  
**Issue:** Implementation of the White-tailed Deer Management Plan and Environmental Impact Statement  
**Unit:** Valley Forge National Historical Park  
**Date:** December 29, 2009

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**Background:** The Record of Decision (ROD) for the Final White-tailed Deer Management Plan/Environmental Impact Statement (Final plan/EIS) was signed by the Northeast Regional Director on October 1, 2009. It documents approval of the plan, selects the alternative to be implemented, and sets forth stipulations required for implementation. The National Park Service has selected Alternative D, Combined Lethal and Nonlethal Actions, which was identified as the NPS preferred alternative in the Final plan/EIS. Alternative D was selected because it best meets plan objectives.

The selected alternative continues current park deer management actions including vegetation and deer population monitoring, maintenance of small fenced areas, roadkill removal, public education, coordination with the PGC, and CWD monitoring and response. In addition, the selected alternative incorporates lethal and nonlethal actions to quickly reduce and then maintain the deer population at a certain level in the park that protects native plant communities and promotes forest regeneration and habitat. Initially, the selected alternative will use lethal reduction via sharpshooting and capture/euthanasia to quickly reduce the deer population and achieve the initial deer density goal. When an acceptable reproductive control agent becomes available maintenance of population levels will be conducted via reproductive control. Until an acceptable and effective reproductive control agent becomes available, however, population maintenance will be conducted using lethal methods. The initial target deer density is 31 to 35 deer per square mile (165-185 individuals park-wide). The target number would be adjusted based on the success of forest regeneration (threshold of 8,079 tree seedlings per acre).

The selected alternative includes measures to respond to detection of CWD. A full CWD Response Plan is provided as an appendix in the Final plan/EIS (Appendix C). As long as the closest confirmed case of CWD is more than 60 miles from the park boundary, all meat obtained as a result of lethal reduction actions will be donated to a local food bank or food pantry for the purpose of redistribution for human consumption.

**Current Status:** The NPS expects to complete the process of selecting a contractor to implement the selected alternative in February 2010. Upon contract award, the NPS will move forward with development of a detailed implementation plan which is expected to be completed by the end of March 2010. Based on this schedule and requirements set forth in the ROD and Final plan/EIS (e.g. lethal removal actions must take place between November and March), sharpshooting actions would begin no earlier than November 2010.

**Complaint Filed:** In November 2009, a complaint was filed in the United States District Court for the Eastern District of Pennsylvania by Friends of Animals, a Connecticut non-profit organization, and Compassion for Animals, Respect for the Environment (CARE), a Pennsylvania non-profit organization based in West Chester, PA. The complaint challenges NPS evaluation of a full range of reasonable alternatives in the Final plan/EIS under the National Environmental Policy Act. It also challenges the NPS evaluation of impacts of the selected alternative on public health and safety and consistency of the selected alternative with the NPS Organic Act. The petitioners, represented by the University of Denver

Environmental Law Clinic, request the Court to enjoin the NPS from implementing the selected alternative. This action is being answered for the NPS by the United States Department of Justice and Department of Interior Solicitor's Office.

The Department of Justice recently advised petitioners that lethal removal actions would not be implemented during the 2009/2010 winter season. Pursuant to a schedule which has been approved and ordered by the Court, the parties are to submit briefs by the end of May.

**Communications:** An electronic version of the Record of Decision and Final plan/EIS may be obtained through the Planning, Environment and Public Comment website at <http://parkplanning.nps.gov> or through the park website at <http://www.nps.gov/vafo/parkmgmt/white-tailed-deer.htm>. Copies of the Final plan/EIS and ROD are available at the Chester County Public Library, Montgomery County-Norristown Public Library, Phoenixville Public Library, Tredyffrin Township Public Library, Lower Providence Community Library, and Upper Merion Township Library. A hard copy (limited availability) or CD of the Final plan/EIS and the ROD may be obtained from: Superintendent, Valley Forge NHP, 1400 North Outer Line Drive, King of Prussia, Pennsylvania 19406.

**For Additional information:**

Go to <http://www.nps.gov/vafo/parkmgmt/> and scroll down to White-tailed Deer Management Plan

**Contact:** Kristina Heister, Natural Resource Manager, Valley Forge National Historical Park, 1400 North Outer Line Drive, King of Prussia, Pennsylvania 19406 or [kristina\\_heister@nps.gov](mailto:kristina_heister@nps.gov).