

## Briefing Statement

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**Bureau:** National Park Service  
**Issue:** White-tailed Deer Management Plan and Environmental Impact Statement  
**Unit:** Valley Forge National Historical Park  
**Date:** October 3, 2011

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**Background:** Valley Forge National Historical Park will implement the second year of the lethal reduction phase of the White-tailed Deer Management Plan and Environmental Impact Statement (Plan/EIS) beginning in November 2011 and extending through March 2012. White-tailed deer population monitoring between 1983 and 2009 indicates an increase in deer density from 31-35 to 241 deer per square mile within Valley Forge National Historical Park. An increasing number of deer in the park over the past two decades has resulted in unacceptable changes in the species composition, structure, abundance, and distribution of native plant communities and associated wildlife. Additionally, browsing of tree seedlings and shrubs by deer in the park has prevented forest regeneration, and thus, degraded habitat for many of the park's wildlife species. In June 2001, Congress directed the National Park Service (NPS) to develop a plan to address the issue of deer management at Valley Forge NHP. In May 2006, this directive was reaffirmed by the House Appropriations Committee and, shortly thereafter, the NPS began work on the White-tailed Deer Management Plan/EIS.

The purpose of the Plan/EIS is to provide a deer management strategy that supports long-term protection, preservation, and restoration of native vegetation, wildlife, and other natural and cultural resources. In the process of developing four plan alternatives, the NPS engaged in extensive public involvement, including a project web-site, brochure, four public meetings, and over 80 briefings to civic organizations, local elected officials, and others. The four alternatives were developed using the best available science. The NPS also fully evaluated the impacts of the four alternatives on the human and natural environment.

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

Specifically, the selected alternative continues current park deer management actions including monitoring vegetation and deer population size, monitoring for chronic wasting disease (CWD), maintaining small fenced areas, removing roadkill, educating the public, and coordinating with the Pennsylvania Game Commission (PGC). Further, the selected alternative incorporates lethal and nonlethal actions to quickly reduce and then maintain the deer population at a level that protects native plant communities and promotes forest regeneration and habitat.

Initially, the selected alternative will rely on lethal reduction, through the use of 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 through use of reproductive control. Until an acceptable and effective reproductive control agent becomes available, however, population maintenance will be conducted using lethal methods. As long as CWD is at least 60 miles away from the park, all meat will be donated to organizations such as local food banks, consistent with guidance from the NPS Office of Public Health.

The success of the Plan/EIS is not measured by the number of deer in the park but on the success of forest regeneration. The initial target deer density is 31 to 35 deer per square mile (165-185 individuals park-wide). The target number of deer would be adjusted (up or down) based on the results of vegetation monitoring indicating the level of successful forest regeneration (threshold of 8,079 tree seedlings per acre).

In implementing this phase of the White-tailed Deer Management Plan/EIS, Valley Forge NHP has identified as its top priority the safety of park visitors, park neighbors, park staff, and motorists. To that end, extensive safety measures have been employed to ensure a safe, humane, and successful operation. One of these safety measures is the parks' decision to use highly qualified and experienced marksmen that are familiar with both the park's geography and with conducting lethal activities in a highly suburbanized environment. The NPS will work with professional biologists from the United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services (USDA-WS). USDA-WS has a long history of conducting safe and effective actions to reduce wildlife populations, including the reduction of deer populations at multiple locations in Greater Philadelphia Area and other populated areas nationwide.

The park has adopted additional safety measures including conducting population reduction actions when the park is closed, establishing safety zones, using bait to attract deer to safe removal locations, conducting shooting actions from an elevated position, and utilizing specialized, non-lead ammunition that is safe for use in urban areas and the environment. All activities associated with implementation of the Plan/EIS are being closely coordinated with township and state law enforcement and with the Pennsylvania Game Commission.

The park completed the first year of the lethal reduction phase of the White-tailed Deer Management Plan/EIS between November 2010 and March 2011. Park staff worked with the United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services on 16 nights to remove 600 deer from the park. An operational evaluation conducted by an independent, third party observer, concluded that this operation "met or exceeded all expectations" related to safety, professionalism, communication and record keeping, coordination and cooperation, and the humane treatment of deer. Meat resulting from this action was donated to the Central Pennsylvania Food Bank and provided to food pantries, soup kitchens, and other organizations across 21 counties in Pennsylvania. A total of 18,330 pounds of venison was donated during winter 2010-2011, including 3,000 pounds of venison donated locally in Chester County. Additionally, a total of 271 deer were tested for Chronic Wasting Disease (CWD), a fatal, neurological disease that has been detected approximately 200 miles from the park boundary. All of these deer tested negative for the presence of CWD.

**Lawsuit:** In November of 2009, several groups filed a complaint in Federal District Court challenging the Valley Forge NHP White-tailed Deer Management Plan/EIS, asserting that the NPS had failed to comply with various federal statutes and regulations. On October 27, 2010, US District Judge Mitchell Goldberg issued a decision upholding the Record of Decision. Injunctions filed in November 2010 were also denied by the court. Judge Goldberg's decision was upheld by the United States Court of Appeals on June 27, 2011.

**Current Status:** In July 2011, the NPS completed a modification to the Interagency Agreement with the United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services (USDA-WS) to implement the second year of lethal reduction actions. In September 2011, the NPS and USDA-WS conducted a 3 hour site visit. Based on the schedule and requirements set forth in the ROD and Final plan/EIS, sharpshooting actions will occur between November 2011 and March 2012.

**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>.

**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).