

Analysis of HSUS Report, "Strategies to Manage Axis and Fallow Deer"
Natural and Cultural Resources Management Divisions, Point Reyes National Seashore
6/26/08

The report submitted by the Humane Society of the U.S. (HSUS) lists concerns and proposed alternatives for non-native deer management that were all discussed and analyzed in detail in the Point Reyes National Seashore Non-Native Deer Management Plan/Environmental Impact Statement, released in July 2006. It does not appear to contain any new information or plans for management that have not already been considered during the 5 years of public and expert consultation which led to the final plan. What follows is a summary and updated response to the HSUS concerns.

1. Premise: Removal of all axis and fallow deer is not feasible.

First and foremost it is important to note that if this were indeed the case, there would be no need for the 15-page report.

The 3 requirements for successful eradication cited in the report are currently being met:

- a) The current rate of removal is certainly greater than the reproductive rate.
- b) NPS owns the land surrounding Vedanta. There is no evidence of a self-sustaining population outside NPS lands in Marin County and therefore there is no immigration. The few fallow deer that are outside the Seashore return into the park and Vedanta property during the annual mating season. At this time they are vulnerable to contraception (on Vedanta property) and lethal removal (on NPS property), therefore no "refugium" for non-native deer exists.
- c) Fallow deer do not recognize NPS boundaries and are all vulnerable to control when they leave the Vedanta property.

2. Premise: Non-native deer are a cultural and historic resource and specific protection is warranted.

While some local residents do enjoy seeing non-native deer, and others would prefer their absence, their popularity with a segment of the community does not in itself qualify them as cultural or historic resources to be protected by the NPS. The deer, introduced in the 1940s and 1950s, have no connection to the native Coastal Miwoks or the early European explorers and ranchers of the 18th through early 20th centuries who shaped the significant cultural landscape that is being protected at the Seashore.

Leaders and representatives of the Seashore's affiliated Coast Miwok tribe, the Federated Indians of Graton Rancheria (FIGR), take the position that the only historically and culturally significant animals inhabiting park lands are natives. The non-native deer hold no cultural significance to tribal members, who value most highly the native deer species, black-tailed deer and tule elk. The FIGR agree that non-native species are a threat to native deer, fully support the Seashore's approach to managing non-native deer, and have assisted the Seashore with the program.

3. Premise: Controlling a remnant herd forever is preferable to removal of all non-native deer.

A major premise of the report is that NPS must consider management of the non-native deer in perpetuity because eradication is impossible. Again, this alternative was discussed at length in the EIS. As explained in section 1 above, eradication is feasible. During 5 years of environmental analysis, NPS considered the option of retaining smaller populations of axis and

fallow within the Seashore. This option is not desirable because it would, by necessity, require culling of thousands of deer over time, would result in ongoing damage to Seashore ecosystems and would negatively affect other Seashore priorities, such as endangered species management and ecosystem restoration. Importantly, preservation of non-native deer is inconsistent with the principles of native species protection for which the Seashore was established by Congress and the American people.

4. Premise: Contraception can be used, without lethal removal, to manage fallow and axis deer.

The alternative of controlling or removing all non-native deer through the sole use of contraception was discussed at length in the EIS. Not only did NPS consider complete removal of all non-native deer through contraception, but the park considered control of a remnant herd through contraception as well. As a result of scientific modeling and extensive consultation with every notable wildlife contraception researcher in the U.S., including a researcher who works closely with HSUS, both of these alternatives were dismissed from consideration. Use of fertility control alone to control or eliminate non-native deer is not only expensive and logistically difficult, it is infeasible.

5. Premise: The contraceptive proposed by HSUS is a new contraceptive technology and preferable to what NPS is using.

The EIS clearly analyzes the potential use of porcine Zona Pellucida (pZP), the contraceptive proposed by HSUS, and Seashore biologists have years of experience with the use of pZP in tule elk. It is unclear why the report would recommend pZP, an older, shorter-duration technology, to replace the contraceptive the Seashore is currently using experimentally - a newer and possibly longer-lasting technology. As explained at length in the EIS, contraception that only provides annual or short-term prevention of pregnancy, as pZP does, is unworkable as a solution by itself. Even as an adjunct to lethal controls, the cost and logistic difficulties of capturing, holding, injecting, and marking treated animals would likely make annual fertility control infeasible. Neglecting to mark treated animals would preclude any collection of data or evaluation of whether the contraceptive was actually working.

Conclusion:

The HSUS proposal unfortunately does not provide any new information not previously considered during the 5-year development of the Seashore's non-native deer management plan. The contraceptive technology proposed by HSUS is older and has less potential for effective population control than the contraceptive being currently researched by NPS. The proposal to designate non-native deer as "cultural and historic" resources has neither a historic nor a cultural rationale and is inconsistent with the principles for which Point Reyes National Seashore was established. Control of unmarked non-native deer in perpetuity through the sole use of contraception, as proposed by HSUS, is infeasible and would result in huge outlays of federal funds without any means for accountability to the public.