



FINDING OF NO SIGNIFICANT IMPACT

WHITE-TAILED DEER MANAGEMENT PLAN

National Capital Parks - East
Washington, DC, and Maryland

The National Park Service (NPS), in cooperation with the District of Columbia Department of Energy and Environment (DOEE), prepared an Environmental Assessment (EA) to evaluate the potential environmental impacts associated with implementing a White-tailed Deer (*Odocoileus virginianus*) Management Plan (Plan) for several park units administered by National Capital Parks – East in Washington, DC, and Anne Arundel, Prince George’s, and Charles counties in Maryland. The Plan will guide future actions to manage white-tailed deer populations within National Capital Parks – East for at least the next 20 years. Implementation of the Plan will manage deer populations to promote natural regeneration of forest vegetation and the restoration of cultural landscapes that have been detrimentally affected by deer overbrowsing. Deer overbrowsing causes unsustainable degradation of the parks’ forests and natural resources, which are also important character defining elements that contribute to the significance of cultural landscapes. The purpose of the Plan is to develop a white-tailed deer management strategy that supports long-term protection, preservation, and restoration of native vegetation and cultural landscapes within parks administered by National Capital Parks – East. This Plan is needed because an overabundance of deer dominates the park’s ecological systems, degrading vegetation and the habitats of other native wildlife.

Deer management implementation areas are proposed within National Capital Parks – East at the following park units.

Washington, DC

- Anacostia Park and Kenilworth Park and Kenilworth Aquatic Gardens
- Civil War Defenses of Washington Parks: Fort Dupont, Fort Davis, Fort Mahan, Fort Chaplin, Fort Stanton, Fort Ricketts, and Shepherd Parkway, including Fort Greble and Battery Carroll
- Oxon Run Parkway

Maryland

- Baltimore-Washington Parkway
- Greenbelt Park
- Suitland Parkway
- Oxon Cove Park*, including Oxon Hill Farm and Bald Eagle Hill
- Civil War Defenses of Washington Parks: Fort Foote Park
- Harmony Hall
- Fort Washington Park
- Piscataway Park, including Marshall Hall

* Note – A portion of Oxon Cove Park, including Bald Eagle Hill, is within Washington, DC

The EA was prepared in accordance with the National Environmental Policy Act (NEPA) (42 United States Code (USC) § 4332) and the Council on Environmental Quality implementing regulations effective September 14, 2020 (40 Code of Federal Regulations (CFR) §§ 1500-1508); US Department of the

Interior NEPA regulations (43 CFR 46); NPS Director’s Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-Making*; and the NPS NEPA Handbook. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file.

PUBLIC AND AGENCY INVOLVEMENT

Public Scoping - As part of the NEPA process and to comply with the requirements of Section 106 of the National Historic Preservation Act, the NPS and DOEE involved the public in project scoping by holding a 30-day public comment period from June 15, 2021, to July 15, 2021. A virtual public meeting was also held on June 15, 2021, using the GoToWebinar platform. The scoping period and virtual meeting were announced by sending an email blast to agencies, stakeholders, and other potentially interested parties from a mailing list established for the Project. Scoping flyers were also posted at each of the parks where deer management activities are proposed. The presentation used during the virtual public meeting, a recording of the meeting, the scoping flyer, and a scoping information sheet remain available at the NPS Planning, Environment and Public Comment (PEPC) project webpage (<https://parkplanning.nps.gov/projectHome.cfm?projectID=102432>). A total of 56 people attended the virtual meeting, and 126 correspondences were received from the public during the scoping period.

EA Public Review - The EA was made available for public review and comment from October 6, 2021, to November 8, 2021, at the NPS PEPC project webpage (<https://parkplanning.nps.gov/projectHome.cfm?projectID=102432>). The EA public review period was announced on the NPS PEPC project webpage and by news release and email blast. A total of 97 pieces of correspondence were received during the EA public review period. Responses to substantive public comments are provided in Attachment B.

National Historic Preservation Act, Section 106 Consultation - Pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800) “Protection of Historic Properties,” NPS initiated consultation with the District of Columbia Historic Preservation Office (DC SHPO) and the Maryland Historical Trust (MHT) in a letter dated April 27, 2021. The letter briefly described the project, defined the Area of Potential Effect (APE), and identified historic properties within the APE. MHT acknowledged receipt of the initiation letter on April 28, 2021, and the DC SHPO acknowledged receipt of the letter on May 18, 2021. The consultation initiation letter is provided in Attachment C.

The NPS submitted an Assessment of Effects to the DC SHPO and MHT dated September 1, 2021, that assessed whether the proposed undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Based on the Assessment of Effects, it was determined that the proposed undertaking will have no adverse effect on historic properties and no effect on archaeological resources. The MHT and DC SHPO concurred with the NPS’s determination in responses dated September 28, 2021, and October 4, 2021, respectively. Copies of the MHT and DC SHPO responses are also provided in Attachment C.

Tribal Consultation – Tribal consultation initiation letters were sent to the Delaware Nation, Cedarville Band of Piscataway Indians, Catawba Indian Nation, Piscataway Conoy Tribe, Piscataway Indian Nation, Pamunkey Indian Tribe, the Eastern Shawnee Tribe of Oklahoma, and the Shawnee Tribe of Oklahoma on April 27, 2021. The consultation initiation letter sent to the Tribes is provided in Attachment C. No comments were received from any of the Tribes.

Endangered Species Act, Section 7 Consultation - In accordance with Section 7 of the Endangered Species Act, an official species list was obtained through the US Fish and Wildlife Service's (FWS) Information, Planning, and Consultation (IPaC) System on July 6, 2021, that identified the federally listed threatened northern long-eared bat (*Myotis septentrionalis*) and yellow lance mussel (*Elliptio lanceolata*) as potentially occurring in the vicinity of proposed deer management activities. However, the NPS determined that implementation of the Plan may affect the northern long-eared bat in a manner consistent with the description of activities addressed by the FWS Programmatic Biological Opinion dated January 5, 2016. Therefore, the NPS Section 7 responsibilities for implementation of the Plan have been satisfied for the northern long-eared bat. In addition, the NPS determined deer management activities would have no effect on the yellow lance. Therefore, no further consultation with FWS is necessary.

ALTERNATIVES CONSIDERED AND SELECTED

The EA analyzed two alternatives: no action, and white-tailed deer management. Based on the analysis presented in the EA, the NPS selected White-tailed Deer Management (the Preferred Alternative) for implementation. A detailed description of the Selected Alternative can be found on pages 8 through 11 of the EA. The Selected Alternative uses lethal deer management actions to reduce the deer population at National Capital Parks – East to a sustainable level with the primary goal of promoting forest regeneration in support of natural ecosystems and cultural landscapes. The number of deer to be removed annually will be determined based on recent population surveys and an initial deer density goal of 15 to 20 deer per square mile, as well as past and current experience of other deer management programs, technical feasibility, and success of forest regeneration in later years of plan implementation. Goals may be adjusted based on the results of vegetation and deer population monitoring that would be incorporated into annual operations plans prepared for each implementation area within National Capital Parks – East.

Use of firearms will be the primary method for lethal removal of deer. Lethal removal of deer will only be conducted by experienced NPS employees or authorized agents (including certified skilled volunteers) with the necessary qualifications, as determined by the NPS. In addition to lethal removal of deer, the authorized agents will locate, field dress the deer, and, if applicable, process the animals for meat donation. In areas where use of firearms is not appropriate due to safety or security concerns, the use of archery, or capture and euthanasia, will be considered as possible options in very limited circumstances and on a case-by-case basis. Bait stations may be used to attract deer to safe removal locations that will consist of automated corn feeders or piles of corn, small grains, apples, hay, or other food attractants on the ground.

Lethal removal activities will allow for targeted surveillance and sampling for Chronic Wasting Disease (CWD) by directing authorized agents to remove deer that appear ill or that are exhibiting clinical signs consistent with CWD. If CWD is confirmed within the deer population, the NPS will follow established CWD protocols. The NPS will follow current guidance from the NPS Office of Public Health and the Washington Office – Biological Resources Division regarding donation of meat from areas affected by CWD, in addition to state and local requirements. If NPS is unable to donate the meat, it may place deer carcasses in remote portions of the parks away from roads and trails to naturally decompose or to be scavenged. Any deer carcasses that are not suitable for consumption or for surface disposal will be disposed of at an approved local landfill or other disposal facility that accepts deer carcasses. In addition, opportunistic and targeted surveillance and sampling for CWD will be conducted on an ongoing basis, as well as population health monitoring to assess kidney fat, tissues toxicity, and parasite loads.

The NPS will continue to monitor deer population trends using distance sampling, wildlife cameras, or other methods. NPS will also document the estimated age and sex of all deer removed from National Capital Parks – East to aid in defining the local population composition and to compare with composition data collected during park population surveys. Vegetation monitoring, including forest survey plots, will continue to be conducted to document any changes in forest regeneration that might result from a reduced

deer population. Deer removal efforts will be maintained if park objectives are being met and forest regeneration is occurring successfully at initial deer density goals.

The NPS will continue to track research related to deer management, including the outcome of actions being taken in neighboring jurisdictions, and the latest research on various deer management methods, including non-lethal actions such as reproductive control.

RATIONALE FOR DECISION

The NPS selected the White-Tailed Deer Management alternative for implementation because it will result in minimal environmental impacts while meeting the project purpose and need. The No Action Alternative does not satisfy the need for the project because without deer management efforts, the abundance, distribution, structure, and composition of native plant communities and associated cultural landscapes at National Capital Parks – East will continue to be compromised by deer overbrowsing.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse impacts to affected resources, whether under the jurisdiction of the NPS or as a result of an NPS decision. To help ensure the protection of cultural and natural resources and the quality of the visitor experience, the NPS will implement mitigation measures to avoid and/or minimize impacts. Mitigation measures of the selected alternative are provided below. These mitigation measures will allow the NPS to meet its conservation mandates as required by the NPS Organic Act (16 USC 1 *et seq.*), minimize disruption for park visitors, and ensure the safety of the public during deer management activities.

Mitigation measures of the selected alternative are provided below. These mitigation measures will minimize disruption to park visitors and neighbors and ensure public safety during deer management activities.

- Deer management activities will occur during the late fall and winter months when visitation is lower and at night when the parks are closed.
- Advance notices will be posted within the parks and press releases will be sent to local media outlets prior to initiating deer management activities.
- Temporary closures of park roads and trails will be implemented. NPS will patrol public areas to ensure compliance with park closures and public safety measures, and the public will be notified of any park closures in advance.
- Signs will be posted and NPS personnel or their authorized agents will be stationed at closed roads and trails to ensure that nighttime visitors do not enter active deer management areas.
- The NPS may also coordinate with law enforcement to assist with enforcing road and trail closures.
- Lethal removal with firearms will not occur near park boundaries or near occupied buildings or congested areas.
- Only highly trained firearms experts experienced in conducting wildlife reduction operations will be used.
- Lethal removal with firearms will use elevated positions to provide downward angled shots and will only shoot toward the interior of the park and away from buildings, including historic structures and significant landscape elements.
- Non-lead ammunition with a shorter travel distance will be used.
- Lethal removal with firearms will primarily occur at night (between dusk and dawn), when deer are more visible and fewer visitors in the park. Authorized agents will use infrared heat scanners and night vision goggles to identify deer since they will be working at night.

- Noise-suppressed weapons will be used to ensure that park neighbors are not disrupted during nighttime deer management activities.
- When donating meat, the parks will follow current guidance from the NPS Office of Public Health and the Biological Resource Management Division with regard to donation of meat from areas affected by CWD and state and local requirements.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT IMPACT

As documented in the EA, the selected alternative has the potential for adverse and beneficial impacts on vegetation (see EA pages 14-19), white-tailed deer (see EA pages 20-22), terrestrial wildlife and habitat (see EA pages 22-23), cultural landscapes (see EA pages 23-27), visitor use and experience (see EA pages 27-30), and human health and safety (see EA pages 30-32); however, the NPS has determined that the selected alternative can be implemented without a significant effect on the human environment or impairment of park resources.

Vegetation - It is expected that lethal deer management actions will quickly reduce the deer population and associated browsing pressure on seedlings, trees, shrubs, and herbs, which will support an increase in plant reproduction that will lead to an increase in forest regeneration and the abundance and diversity of native plants. Reducing the deer population will improve the number and survivability of tree seedlings, which will provide the necessary growth for natural forest regeneration over the long-term.

Studies demonstrate that the selected alternative may result in a decrease in nonnative invasive vegetation in National Capital Parks – East, such as Japanese stiltgrass (*Microstegium vimineum*) and garlic mustard (*Alliaria petiolate*). A reduced deer population will also benefit the critically imperiled Fall-line Terrace Gravel Magnolia Bog plant community documented at Greenbelt Park, and the Coastal Plain Oak Floodplain Forest plant community documented within Baltimore-Washington Parkway and Piscataway Park, which are forest communities where deer browsing disturbance is evident. The critically imperiled North Atlantic Coastal Plain Dry Calcareous Forest, found at Fort Washington Park, as well as the imperiled North Atlantic Coastal Plain Oak – Pine Forest and Pine Barrens Pitch Pine – Hardwood Swamp Forest communities are also expected to benefit from a reduced deer population.

White-tailed Deer - Reducing the deer population density to 15 to 20 deer per square mile using lethal management actions is expected to promote natural forest regeneration and plant abundance and diversity. Allowing vegetation to recover without excessive deer browsing will provide for better foraging and sheltering habitat for deer within the parks. Improving habitat conditions will also be expected to reduce winter stress on deer by increasing the abundance of suitable food sources. A reduced population density will also decrease the potential risk of diseases, such as CWD.

Quickly reducing the deer population within 5 years to the NPS goal in the initial stages of management will result in immediate impacts on the parks' deer populations. After the NPS goal is reached, continual deer management activities will be required to maintain the population at a sustainable level. Implementing continual deer management strategies will improve the overall condition of the deer population by improving habitat and reducing the potential for nutritional stress and disease. Deer management will ensure that deer remain an important part of park ecosystems by reducing the stress that an overabundance of deer places on these ecosystems.

Terrestrial Wildlife and Habitat - Deer management activities could affect other mammals. Automated corn feeders or piles of corn on the ground used for bait could provide a temporary additional food source for some species. In addition, the presence of increased human activities and associated noise during specific time periods could result in temporary behavior changes and the avoidance of management areas.

Reducing the deer population density to 15 to 20 deer per square mile using lethal management actions is expected to improve habitat conditions for wildlife. The reduced deer browsing pressure will increase native plant abundance and promote species diversity particularly in the herb and shrub layers, thereby

improving foraging, nesting, breeding, and sheltering habitat for small mammals and ground and shrub-nesting birds. Additionally, natural forest regeneration is expected to promote and maintain a natural tree canopy that will benefit species that live in the upper canopy, or tree bark or cavity nesters. Plant abundance and diversity will also be expected to increase the abundance of food sources for wildlife, such as acorns and other tree fruits.

Cultural Landscapes - The selected alternative will reduce the deer population at National Capital Parks – East to an acceptable level with the primary goal of promoting forest regeneration in support of natural ecosystems and cultural landscapes. This forest regeneration will have a beneficial impact to the hardwood forests that are contributing features at Fort Foote, Fort Mahan, Fort Chaplin, Greenbelt Park, Fort Washington, and Piscataway Park. In addition, damage will be reduced to orchards, individual contributing plants, and plantings. Native plant populations and cultural plantings are character-defining vegetation features of the park's cultural landscape. The re-establishment or rehabilitation of these features will have beneficial impacts. Reduction of deer populations may also reduce ongoing damage to earthworks and circulation in general throughout cultural landscapes, such as at Fort Foote and Fort Dupont.

Visitor Use and Experience - The selected alternative may result in temporary disruptions to park visitors, primarily from the closures that would be required to accomplish deer management activities safely. Implementing these closures would impact visitor use and experience while management activities are being conducted. However, these disruptions would be minimal because deer management activities would occur during the late fall and winter months when visitation is lower and at night when the parks are closed.

Potential closures at each park unit where deer management is proposed are briefly described on pages 29 and 30 of the EA. Depending on the park location, closures would be coordinated with US Park Police, District Department of Transportation (DDOT), Maryland Department of Transportation (MDOT), M-NCPPC Park Police, and County transportation agencies, as needed. Also, NPS personnel or their agents would be stationed at possible access points while deer management is occurring to prevent entry into the implementation areas.

Over the long-term, a reduced deer population density would be expected to improve habitat conditions within the parks, thereby increasing visitors' opportunity to experience an abundance and diversity of terrestrial wildlife. Damage to vegetation would be reduced, but these benefits may not be readily apparent to most visitors. Also, fewer deer may be observed while at the parks, which may detract from the experience for some visitors.

Human Health and Safety - Reduction in the deer population under the selected alternative is expected to decrease the risk of vehicle collisions with deer and result in an associated reduction in host animals for tick populations. However, there are other mammals that also serve as hosts for ticks, so the possibility that visitors and employees may still encounter ticks and acquire Lyme disease or other tick-borne diseases will not be eliminated.

Risks to human health and safety will be minimal due to the numerous safety protocols put in place during lethal deer management activities to ensure the safety of the public. Prior to initiating deer management activities, the NPS will post advance notices within the parks and send press releases to local media outlets to inform the public of upcoming deer management activities. Deer management activities will occur only at night when the parks are closed; however, the NPS will temporarily close park roads and trails while deer management activities are underway. Signs will be posted and NPS personnel or their agents will be stationed at closed roads and trails to ensure that nighttime visitors do not enter active deer management areas. The NPS may also coordinate with law enforcement, such as with the US Park Police and M-NCPPC Park Police, to assist with enforcing road and trail closures.

Deer management activities will be conducted in a manner to ensure the safety of neighboring communities. Sharpshooting will not occur near park boundaries and will not occur near occupied buildings or congested areas. Only highly trained firearms experts experienced in conducting wildlife reduction operations will be used. Lethal removal with firearms will occur from elevated positions to provide downward angled shots and will only shoot toward the interior of the park and away from buildings. Special non-lead ammunition with a shorter travel distance will also be used. Authorized agents will be required to use infrared heat scanners and night vision goggles to identify deer since they will be working at night. Finally, noise-suppressed weapons will be used to ensure that park neighbors are not disrupted during nighttime deer management activities.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

Recommended:

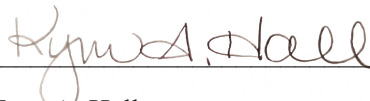
**TARA
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Tara D. Morrison
Superintendent
National Capital Parks – East
Region 1 - National Capital Area

Date

Approved:



Kym A. Hall
Regional Director
Region 1 - National Capital Area

March 25, 2022

Date

ATTACHMENTS

Attachment A: Non-Impairment Determination
Attachment B: Responses to Substantive Public Comments
Attachment C: Agency Consultation Documentation

ATTACHMENT A: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (54 USC 100101).

The NPS has discretion to allow impacts on Park resources and values when necessary and appropriate to fulfill the purposes of a Park (NPS 2006 sec. 1.4.3). However, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006 sec 1.4.3). An action constitutes an impairment when its impacts “*harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values*” (NPS 2006 sec 1.4.5). To determine impairment, the NPS must evaluate “*the particular resources and values that would be affected; the severity, duration, and timing of the impact...and other impacts*” (NPS 2006 sec 1.4.5).

This determination on impairment has been prepared for the selected alternative described in the Finding of No Significant Impact (FONSI). An impairment determination is made for vegetation, white-tailed deer, terrestrial wildlife and habitat, and cultural landscapes. An impairment determination has not been made for social environment because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values.

VEGETATION

It is expected that lethal deer management actions will benefit vegetation over the long-term by increasing forest regeneration and the abundance and diversity of native plants in National Capital Parks – East. A reduced deer population will also benefit critically imperiled plant communities in National Capital Parks – East and will also be expected to decrease the abundance of nonnative invasive vegetation such as Japanese stiltgrass (*Microstegium vimineum*) and garlic mustard (*Alliaria petiolate*). The selected alternative will not result in impacts to vegetation that constitute impairment to park resources or values.

WHITE-TAILED DEER

Reducing the deer population density is expected to promote natural forest regeneration and plant abundance and diversity that will provide for better foraging and sheltering habitat for deer within the parks. Deer management will improve the overall condition of the deer population by improving habitat and reducing the potential for nutritional stress and disease. The selected alternative will not result in impacts to white-tailed deer that constitute impairment to park resources or values.

TERRESTRIAL WILDLIFE AND HABITAT

Reducing the deer population density is expected to improve habitat conditions for wildlife by improving foraging, nesting, breeding, and sheltering habitat for small mammals and ground and shrub-nesting birds. Natural forest regeneration is expected to promote and maintain a natural tree canopy that will benefit species that live in the upper canopy, or tree bark or cavity nesters. Plant abundance and diversity is also expected to increase the abundance of food sources for wildlife, such as acorns and other tree fruits. The selected alternative will not result in impacts to terrestrial wildlife and habitat that constitute impairment to park resources or values.

CULTURAL LANDSCAPES

The selected alternative will promote the regeneration of hardwood forests that are contributing features of cultural landscapes at National Capital Parks – East. Damage to orchards, individual contributing plants, and plantings, as well as ongoing damage to earthworks and circulation features within cultural landscapes will also be reduced. The selected alternative will not result in cultural landscape impacts that constitute impairment to park resources or values.

CONCLUSION

The NPS has determined that the implementation of the NPS selected alternative will not constitute an impairment of the resources or values of National Capital Parks – East. As described above, implementing the selected alternative is not anticipated to impair resources or values that are essential to the purposes identified in the establishing legislation of the park, key to the natural or cultural integrity of the park, or identified as significant in the park's relevant planning documents. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of the NPS Management Policies 2006.

ATTACHMENT B: RESPONSES TO SUBSTANTIVE PUBLIC COMMENTS

INTRODUCTION

Pursuant to the National Environmental Policy Act (NEPA), its implementing regulations, and National Park Service (NPS) guidance on meeting NPS NEPA obligations, National Capital Parks – East must assess and consider comments submitted on the White-Tailed Deer Management Plan/EA (the Plan) and provide responses to substantive concerns raised in these comments. This report describes how the NPS considered public comments and provides the responses. The EA was made available for public review and comment from October 6, 2021, to November 8, 2021, at the NPS PEPC project webpage (<https://parkplanning.nps.gov/projectHome.cfm?projectID=102432>). The EA public review period was announced on the NPS PEPC project webpage and by news release and sent to the park's email list.

A total of 97 pieces of correspondence were received during the EA public review period. Each correspondence was read, and specific comments within each piece of correspondence were identified. A total of 175 comments were derived from the correspondence received.

To categorize and address comments, each comment was given a code to identify the general content of a comment and to group similar comments together. A total of 19 codes were used to categorize the comments received on the EA. An example of a code developed for this project is *AE1000 - Affected Environment: Natural Resources*. During coding, comments were also classified as substantive or non-substantive. A substantive comment is defined in the NPS Director's Order Handbook as one that does one or more of the following (Director's Order 12, section 4.6A):

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

As further stated in Director's Order 12, substantive comments "raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive." While all comments were read and considered, only those determined to be substantive were analyzed for creation of concern statements for response from the NPS, as described below. Under each code, all substantive comments were grouped by similar themes, and those groups were summarized with a concern statement. For example, under the code *AL1080 - Alternatives: Considered and Dismissed – Other Lethal Alternatives*, one concern statement identified was "Commenters suggested that the public should be allowed to participate in hunting, including archery/bow programs." This one concern statement captured many comments. Following each concern statement are one or more "representative quotes," which are comments taken from the correspondence to illustrate the issue, concern, or idea expressed by the comments grouped under that concern statement.

As shown in Table 1, 25% of the substantive comments received are related to three of the 21 codes. These codes are related to non-lethal alternatives (AL1060, Alternatives: Considered and Dismissed - Non-lethal Methods for Deer Management; AL1080, Alternatives: Considered and Dismissed - Other Lethal Alternatives; and AL1090, Alternatives: Other Non-Lethal Alternatives). Non-substantive comments comprise 29% of the comments received. Of these, 14% were in support of lethal deer management (AL1000, Alternatives: Support Lethal Deer Management); (Not Substantive); 7% did not support lethal deer management (AL1010, Alternatives: Do Not Support Lethal Deer Management; and 8% supported the use of non-lethal deer management

(AL1020, Alternatives: Considered and Dismissed - Support Use of Non-Lethal Deer Management Including Use of Immunocontraceptives or Fertilization Control Programs). Of the 97 pieces of correspondence, 39 came from commenters in Maryland (40.2%), 38 came from the District of Columbia (39.2%), and 12 came from Virginia (12.4%). The remaining correspondence came from six other states (Table 2).

Table 1: Comment Distribution by Code

Code	Description	Number of Comments	% of Comments Received
AE1000	Affected Environment: Natural Resources	16	9%
AE1010	Affected Environment: Visitor Experience	9	5%
AL1000	Alternatives: Support Lethal Deer Management (Not Substantive)	24	14%
AL1010	Alternatives: Do Not Support Lethal Deer Management (Not Substantive)	12	7%
AL1020	Alternatives: Considered and Dismissed - Support Use of Non-Lethal Deer Management Including Use of Immunocontraceptives or Fertilization Control Programs (Not Substantive)	14	8%
AL1030	Alternatives: Range of Alternatives	3	2%
AL1040	Alternatives: Cost	3	2%
AL1060	Alternatives: Considered and Dismissed - Non-lethal Methods for Deer Management	37	21%
AL1080	Alternatives: Considered and Dismissed - Other Lethal Alternatives	5	3%
AL1090	Alternatives: Other Non-Lethal Alternatives	2	1%
AL2100	Alternatives: Expanded Action	11	6%
AL2110	Alternatives: Introduction of Natural Predators	3	2%
AL2120	Alternatives: Coordinate with Tribal Organizations for Deer Management	2	1%
EC1000	Environmental Consequences: Impact Analysis	2	1%
EC1010	Environmental Consequences: Natural Resources	6	3%
EC1020	Environmental Consequences: Visitor Experience	1	1%
EC1030	Environmental Consequences: Human Health and Safety	5	3%
ED1000	Editorial: Request for Clarification and Data	3	2%
PN1000	Purpose and Need: Planning Process and Policy	5	3%
PN1010	Purpose and Need: Proposed Action	2	1%

Code	Description	Number of Comments	% of Comments Received
PN1020	Purpose and Need: Need for the Proposed Action	10	6%
	TOTAL COMMENTS	175	

Table 2: Correspondence Distribution by State

State	Number of Correspondences	Percentage
MD	39	40.2%
DC	38	39.2%
VA	12	12.4%
CA	2	2.1%
NJ	2	2.1%
NY	1	1.0%
IA	1	1.0%
NC	1	1.0%
UT	1	1.0%
TOTAL	97	100%

CONCERN RESPONSE REPORT

This report summarizes the substantive comments received on the National Capital Parks – East White-tailed Deer Management Plan/EA during the public review comment process. These comments are organized by codes and further organized into concern statements. Representative quotes are then provided for each concern statement. The NPS provides a response for each concern statement. References cited below are included at the end of this section.

AE1000 - Affected Environment: Natural Resources

Concern ID: 66167

**CONCERN
STATEMENT:**

Commenters asked for information on the frequency and method of monitoring for deer and vegetation. A commenter also asked how the deer count methods would be applied to parks that differ in size, vegetative makeup, and use. Another commenter noted that monitoring should count and track deer in Washington, DC.

**Representative
Quote(s):**

Corr. ID: 15

Organization: Penn Branch Community Association Inc.

Comment ID: 1023451

Organization Type: Civic Group

Representative Quote: A monitoring program for a year is truly required to get a more accurate count of this population and their movement across all sectors of the city. Many of them entered dangerous terrain (hilly property), tried to jump, and have broken legs, necks and died on residential property. Their removal currently is the responsibility of the resident, who may be a senior and cannot move these heavy caucuses to public space, where the local government will come and remove them. So you should take on the ownership during this monitoring period to remove these caucuses.

Corr. ID: 48

Organization: Not Specified

Comment ID: 1023453

Organization Type: Unaffiliated Individual

Representative Quote: I believe that the proposed action of deer population surveys along with vegetation monitoring should go into effect. With extensive research and data, any evidence of overpopulation of the white-tailed deer would be clear to show that lethal action should be taken...In a Cornell study, a team began a study by sectioning off three deer management zones with different approaches; "fertility control, using surgical sterilization; recreational hunting; and no management" (Navarra and Wiegand 2019). While this approach was not initially successful, the team then planted oak seedlings, which showed the number of deer in each region

due to their affinity for the plant (Navarra and Wiegand 2019). This could be an interesting addition to the proposed plan for the beltway parks.

References: Navarra, Katie, and Jana Weigand. 2019. "10-year study provides model for deer management strategies." Cornell University November 14, 2019. <https://news.cornell.edu/stories/2019/11/10-year-study-provides-model-deer-management-strategies>

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023456

Organization Type: Unaffiliated Individual

Representative Quote: The NPS indicates that it and other agencies conduct deer population surveys in some of the NCPE parks and that deer population densities exceed that density that the NPS claims is necessary to protect park vegetation, promote forest regeneration, and mitigate impacts to cultural resources/landscapes. The NPS discloses limited deer population data for Greenbelt, Piscataway, Fort Washington, and Anacostia Park but it fails to actually disclose all relevant data collected over the years from these and any other parks within NCPE. Based on what is disclosed, it appears that the NPS has no deer abundance data for many of the parks where the NPS has proposed to engage in lethal deer control. Of the data that is disclosed, deer densities have declined significantly since 2010 in Greenbelt and Fort Washington Parks yet the NPS neither admits to such a reduction in density or explains what factors may be contributing to the decline. In addition, other than indicating that it uses spotlight surveys, distance sampling, and wildlife cameras to estimate deer abundance/density, the NPS fails to explain the methodologies used in conducting the counts. Information about where the surveys are conducted, when, by whom, whether and how the NPS extrapolates collected data to develop park-specific density estimates, what assumptions underlie the interpretation or calculation of the abundance data, and if the NPS uses any type of double-count system to ensure the accuracy of the collected data. Without such information it is impossible to assess the suitability of the deer abundance methodology being used or to determine the accuracy of the resulting data. Such information, including all deer population abundance estimate data collected over time in the NCPE parks, must be disclosed and objectively analyzed in order for the NPS to comply with NEPA.

Response:

The Plan includes the available data from the NPS deer monitoring program for 10 of the last 12 years in Maryland and DC. The data reflect the variable nature of deer population density at each of the individual parks. Although population density has fluctuated, the numbers of deer are well above levels that allow for adequate tree seedling regeneration. There has been no documentation of an eastern United States urban deer population undergoing a long-term reduction in population due to natural processes.

The Plan includes the continuation of current management actions, including annual monitoring of deer population densities and forest regeneration, and opportunistic surveillance of CWD within the deer population (EA page 8). Through adaptive

management these annual monitoring studies will inform park decisions for the number of deer to be removed through lethal reduction of the population. The park considers past and current experience of other deer management programs, technical feasibility, and success of forest regeneration in later years of Plan implementation as NPS works toward the sustainable population level of approximately 15 to 20 deer per square mile (EA page 9). NPS will prepare annual operational, safety, and communications plans that will consider current conditions, including the number of deer to be culled and procedures for culling.

Concern ID: 66168

**CONCERN
STATEMENT:**

A commenter stated that there is conflicting information on the condition of vegetation within the parks and that additional information on vegetation monitoring should be included in the EA.

**Representative
Quote(s):**

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023455

Organization Type: Unaffiliated Individual

Representative Quote: For vegetation and forests, the NPS notes that 47 monitoring sites are present within the NCPE parks and provides some data on sapling densities claiming that the low density are attributable to an overabundance of deer. Conversely, despite claiming that deer are devastating park vegetation/forests, the NPS reports that "more plant species have been identified in these park units during vegetation monitoring and surveys than any other park in the National Capital Area," DEA at 14, suggesting that the "deer problem" claimed by the NPS has been overstated. The NPS, however, fails to provide any information about the location of the sampling plots, what methodology was used to select the location of the plots (i.e., random/non-random selection), how and when the plots are sampled, whether there are paired or single plots, whether plots are fenced to prevent deer/wildlife ingress, whether the location of the plot considered the aspect and slope of the landscape, the soil type and health for each plot, and long-term precipitation/temperature data. Similarly, in regard to the reported impacts of lethal deer control on forest species regeneration in other parks, the NPS fails to provide the same information. Furthermore, with the exception of providing minimal sapling density data, the NPS fails to provide any other information about the abundance, composition, health, productivity, and diversity of the plant species found in the sampling plots. It also has failed to even consider, let alone disclose, other factors (other than invasive plants) that may be adversely impacting park vegetation/forests including soil health, precipitation characteristics (i.e., amounts, timing, patterns and how they have changed over time), temperature data, visitor activities, air quality, and plant disease preferring to attribute all impacts to deer. Absent the publication of all relevant information on vegetation/forest sampling, a high quality analysis of such data, and disclosure of other factors that could be impacting vegetation/forests in the NCPE parks, the DEA violates NEPA.

Response: Species diversity is different from plant density. Diversity is the composition of the plant community including the variety of species and types of plants present in the community. Plant density is a calculation of the number of plants per area (e.g., stems per acre). As noted in the EA, National Capital Parks - East is home to abundant biological diversity. However, the 2016 National Capital Parks-East Natural Resource Condition Assessment found that within the parks, "Biological integrity was, on average, in moderate condition..." Elevated deer density is negatively impacting the seedling stocking index in forests within the National Capital Parks - East. Over time, the lack of seedlings will result in a decrease in the forest tree canopy and degrade the abundance, distribution, structure, and composition of native plant communities.

While NPS acknowledges that there are other factors that affect seedling regeneration including weather, disease, and other natural phenomena, the effects of the overpopulation of deer on forests is well documented. Deer have been shown to reduce the diversity, density, and average height of seedlings (Tilghman 1989; Frelich and Lorimer 1985; McCormick et al. 1993; and Marquis 1981, Tilghman 1989, McCormick et al. 1993). While fenced and unfenced paired plot monitoring has not been conducted in National Capital Parks - East, NPS has used this method to assess impacts to vegetation in other parks in the National Capital Area; these data with the National Capital Region Network Inventory & Monitoring program (NCRN I&M) are sufficient to support the purpose and need for the Plan. In these parks, the impacts of deer could be distinguished from impacts of other herbivores and other factors. The impacts to vegetation/habitat in unfenced plots were directly attributable to deer, as other environmental factors that can and do influence vegetation/habitat did not vary between fenced and unfenced paired plots.

Concern ID: 66170

CONCERN STATEMENT: Commenters noted that an overabundance of deer in the parks are damaging natural resources

Representative Quote(s): **Corr. ID:** 22 **Organization:** Not Specified

Comment ID: 1023457 **Organization Type:** Unaffiliated Individual

Representative Quote: I strongly support an aggressive management plan. Seedling density in nearby Greenbelt Park is near zero, and the deer overpopulation is also increasing the tick population to the point where hiking without permethrin is unwise. We have foxes to take care of the rodents, but nothing to control the deer.

Corr. ID: 38

Organization: None

Comment ID: 1023458

Organization Type: Unaffiliated Individual

Representative Quote: The lack of understory plants and saplings in nearly every nearby wooded area I have visited in the past several years/decades is alarming. I don't think many people who use these areas for recreation know that they're seeing unhealthy and unsustainable levels of deer browsing and are only thinking about "Bambi". When the mature trees die and no younger trees are there to replace them, the area will be unfit for deer and many other plants, animals, and forms of recreation that only forests can provide.

Corr. ID: 44

Organization: Not Specified

Comment ID: 1023459

Organization Type: Unaffiliated Individual

Representative Quote: As a resident in the area, and as former wildlife officer and participant in white tail deer studies I can corroborate the Service's findings that the population density is outside of the range that is healthful both for the deer, and for the surrounding habitat. My observations don't arise from a scientific study, my anecdotal observations include:

- Deer are bold, accustomed to humans and are frequently in or adjacent to roadways- ever more so as remaining intact habitat is converted to housing and retail developments.
- Deer mortality on regional and rural roadways is a comparatively common occurrence.
- Vegetation in intact forested areas is substantially absent at heights under four feet, and taller vegetation is typically stripped of leaves below that height- including species that white tail deer typically avoid in areas where preferred browse material is still available.
- Deer aggregations of tens of animals are observed from time to time.
- Deer manifesting injuries and/or poor body condition including skin/coat maladies and malnourishment are commonplace.

These circumstances are indications of the overabundance of deer in the area, and the likelihood that persistent over population will exacerbate risk of tick-borne illness that can impact humans, pets and wildlife and of the emergence of more disease among the deer.

Corr. ID: 45

Organization: Ward 8 Woods Conservancy

Comment ID: 1023460

Organization Type:
Conservation/Preservation

Representative Quote: Our staff spend more time on NACE land in Ward 8 than anyone else, so we see firsthand the harmful effects of deer overpopulation. In portions of Shepherd Parkway, the understory is dominated by pawpaw because deer have devoured all the sapling of other species. In many upland areas, there is no understory at all, deer having eaten any and all groundcover. Groves of mountain laurel are stripped of their lower leaves, severely weakening the shrubs and causing some to die.

The constant grazing of saplings by deer prevents young trees from emerging. When older trees die, leaving gaps in the canopy that are exploited by invasives. These invasives, which the deer avoid, are often the only plants left uneaten, exacerbating their explosive growth.

The deer themselves do not look healthy or happy. Many appear frail and starving, and we see their corpses by the sides of roads and in the woods. This highly urbanized area cannot provide them with a safe and healthy habitat in such numbers.

Corr. ID: 49

Organization: Not Specified

Comment ID: 1023462

Organization Type: Unaffiliated
Individual

Representative Quote: The restoration and protection of native plants within our forests is a great necessity that we must continue to strive for. The population of white-tailed deer can be a significant problem to the forest habitats of our deciduous forests, as their natural predators of bobcats, wolves, and coyotes have significantly smaller populations and cannot curb the growth that this species has in its current ecosystem. Their overpopulation, combined with their lack of a significant predator to keep them in check, can, and has, caused a significant detriment to the vegetation of their ecosystem through their need to eat their necessary resource vegetation. This in turn leaves an opening for invasive plant species to grow within the area and reduce the biodiversity of the surrounding ecosystem, causing a spiral of detrimental happenings to the environment.

Response:

NPS concurs that an overabundance of deer is damaging vegetation within National Capital Parks - East. Long-term forest monitoring by the NPS NCRN I&M began in 2006 prior to any deer management within the region's parks. The data continually show that forest regeneration remains inadequate for the forested ecosystems to

function in National Capital Parks - East. Only 6.4% of plots have adequate stocking indexes; the goal is 67% of the plots with adequate tree seedlings (EA page 18).

Concern ID: 66171

**CONCERN
STATEMENT:**

Commenters noted that there is not an overabundance of deer.

**Representative
Quote(s):**

Corr. ID: 64

Organization: Not Specified

Comment ID: 1023467

Organization Type: Unaffiliated
Individual

Representative Quote: Please don't kill the deer. I walk miles and miles through the parks and never see a deer.

Response:

NPS has conducted monitoring since 2002 to collect information on deer densities including in National Capital Parks - East (Greenbelt, Piscataway, Ft. Washington units) and in Washington, DC with DOEE. (EA page 20). While densities have fluctuated, deer populations have remained well above the levels that would allow tree regeneration.

Concern ID: 66172

**CONCERN
STATEMENT:**

A commenter said that NPS did not provide evidence that Chronic Wasting Disease is present among the deer in the Park.

**Representative
Quote(s):**

Corr. ID: 95

Organization: Save the Rock Creek Park
Deer

Comment ID: 1023468

Organization Type: Unaffiliated
Individual

Representative Quote: There is no Chronic Wasting Disease among the deer and to suggest there is, is irresponsible. The mere mention puts the idea in people's heads but it's not true. NPS seeks to confuse and misinform the public.

Response:

The Plan does not state that there is CWD in National Capital Parks - East, but rather states that "The nearest documented occurrence of CWD was found in 2020 in Loudon County, Virginia, approximately 60 miles from the National Capital Parks -

East parks" (EA page 7). The EA provides information on how NPS would monitor for CWD in free-ranging white-tailed deer, coordinate with other agencies, and dispose of deer if CWD is identified within the park (EA page 11).

Concern ID: 66173

**CONCERN
STATEMENT:**

A commenter states that NPS has failed to provide sufficient information on the existing conditions of invasive species in the parks, the causes of invasive species, and NPS' efforts to minimize invasive species.

**Representative
Quote(s):**

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023469

Organization Type: Unaffiliated
Individual

Representative Quote: The NPS suggests that the alleged overabundance of deer in NCPE parks is causing the spread and proliferation of invasive species. It identifies some of the invasive species found in the NCPE parks in the DEA but fails to provide a comprehensive list of such species, park specific maps of the location of each species, an explanation of the physical, chemical, or other strategies employed by the NPS to control/eradicate such species, or the role of humans in spreading such species - including from residential/industrial properties adjacent to the parks and/or humans transporting the seeds of invasive species into the park on their shoes or clothing. Nor does the NPS disclose other factors, unrelated to deer, which may be causing or contributing to the proliferation of invasive plants in the NCPE parks. Absent disclosure and analysis of that information, the DEA violates NEPA.

Response:

This Plan is not a comprehensive vegetation management plan. The Plan is an example of an adaptive management plan that focuses on deer management and not invasive plant management. These two subjects are addressed in different planning efforts. The NCRN I&M, which includes National Capital Parks - East, studies the status and long-term trends of exotic trees and shrubs, exotic understory plants, and vines on trees to determine which nonnative plants are spreading throughout the region and what effect they are having on native plants. Current management guidelines and practices annually prioritize the control of nonnative invasive plants. NPS uses volunteers, park staff, a contractor, and the National Capital Area Invasive Plant Management Team to control nonnative invasive plants in the park's natural areas.

Concern ID: 66174

**CONCERN
STATEMENT:**

A commenter states that NPS has failed to provide sufficient information on the existing conditions of small mammals, birds, insects, and imperiled/sensitive species, and that NPS has not demonstrated that deer impact these species.

**Representative
Quote(s):**

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023470

Organization Type: Unaffiliated
Individual

Representative Quote: The NPS claims that the overabundance of deer in NCPE is adversely impacting the habitat of small mammals and the small mammal species themselves. With the exception of identifying white-footed mice as a prominent small mammal species in the NCPE parks, the NPS does not identify what other small mammal species are found in the parks. Nor does it provide any evidence, including population demographic data, to demonstrate that any small mammal species is declining as a result of deer. Similarly, it fails to disclose the presence of any other threats that may be impacting small mammals including the presence of predators (particularly non-native predators including feral cats and dogs), disease, and/or habitat loss attributable to both natural occurring and anthropogenic factors. Instead the NPS relies entirely on speculation to "prove" that such damage is occurring. Unless the NPS publishes information about the small mammals found in the NCPE parks including population demographic data documenting the estimated abundance estimates for each species over time, the DEA violates NEPA.

o The NPS notes that 243 bird species have been found in the NCPE parks. While identifying some of the bird species, just as with small mammals, the NPS has failed to provide any estimated population abundances or demographic data for any of the bird species in NCPE parks. Of all of the birds species identified in the parks, the NPS claims that the ovenbird and eastern towhee have been harmed by deer but fail to provide any actual data to prove this assertion. Nor has the NPS provided any explanation of other threats that may be impacting birds and their habitats in NCPE parks including the direct and indirect impact of climate change, visitor activities, park service management activities, invasive plant and animals (including feral cats), disease, or, for migratory species, any of the myriad threats that may be adversely impacting the species along their migratory routes.

o The NPS claims that deer adversely affect insects in the NCPE parks which, in turn, negatively impacts birds and other wildlife that rely on insects as food. The NPS provides absolutely no proof that insect populations have declined in NCPE parks or that deer have caused such reported declines. Absent the presentation of such data, the NPS must remove such claims from the DEA. Should such claims be retained without proof, the DEA will violate NEPA.

o The NPS identifies several imperiled/sensitive species found in NCPE parks and suggests, without any data or proof, that deer adversely impact these species. I am not suggesting that deer may not impact such species but the NPS must provide proof of such harm - instead of simply speculating as to what impacts may occur.

Response:

The National Capital Parks - East Natural Resource Condition Assessment (2016), available at <https://irma.nps.gov/DataStore/DownloadFile/548723>, provides information on small mammals and birds found within the parks, including information on species of concern that use habitat within the park. According to the NRCA, the northern short-tailed shrew (*Blarina brevicauda*), found within the parks, is included in the District of Columbia's 2015 Wildlife Action Plan list of species of greatest conservation need (SGCN). The shrew needs habitat restoration and meadow creation (DC DOEE 2015). As noted in the NRCA, the presence in the park of the eastern towhee (*Pipilo erythrophthalmus*) and Acadian flycatcher (*Empidonax virens*), both species of conservation, "indicates that bird species that are declining or vulnerable as species, are finding valuable habitat within Greenbelt Park" (Walsh 2016). The NRCA also documented those 13 species of conservation concern had stable abundance (2007-2011) in the parks. Chimney swift (*Chaetura pelagica*) abundance has increased, and northern flicker (*Colaptes auratus*) and eastern towhee abundance have decreased within the park (Ladin and Shriver 2013). NPS acknowledges that National Capital Parks - East provides important habitat for these species and that a decline in habitat for these species is tightly linked to a decline in the species. The evaluation of impacts to wildlife (other than deer) and wildlife habitat was based on a qualitative assessment of how expected changes to park vegetation under the No Action and Proposed Action Alternatives would affect the abundance and diversity of wildlife populations. Deer overbrowsing and subsequent changes in forest regeneration will result in changes in the quality and quantity of food sources, availability of suitable nesting and foraging sites, amount of cover, and level of competition for existing resources, which would lead to changes in the size, reproductive success, rate of predation, and mortality rate for wildlife populations.

AE1010 - Affected Environment: Visitor Experience

Concern ID: 66175

***CONCERN
STATEMENT:***

Commenters noted that the deer population has negatively affected park visitors and neighbors by damaging vegetation, spreading disease, and deer-human interactions.

***Representative
Quote(s):***

Corr. ID: 2

Organization: Not Specified

Comment ID: 1023471

Organization Type: Unaffiliated Individual

Representative Quote: As urban deer populations in the DC metropolitan area remained uncontrolled, we have suffered "an increase in deer-human conflicts including deer-related automobile accidents, damage to agricultural crops, residential gardens and landscaping, and concerns about communicable disease." (Note 1) Research from Cornell shows deer overpopulation has a serious negative impact on native birds, pollinators and other species. Deer overgrazing eliminates the plants other species need to feed and build shelter, reducing the biodiversity needed for a healthy ecosystem. (Note 2) As our deer no longer have natural predators, a sustained and careful culling might help bring the population back to a more natural level. Donating the meat to the less fortunate is healthy, respectful and cost-effective. The NPS' proposed deer management policy is a sound idea and should be implemented.

Note 1: See Montgomery County (MD), "Deer in Montgomery County."
<https://www.montgomeryparks.org/deer-management/>

Note 2: See The Cornell Lab, Living Bird Magazine, September 2020: "COuld Deer Hunting Improve Habitat for Forest Birds?" <https://www.allaboutbirds.org/news/could-deer-hunting-improve-habitat-for-forest-birds/>

Corr. ID: 7

Organization: Not Specified

Comment ID: 1023472

Organization Type: Unaffiliated Individual

Representative Quote: I am a strict vegetarian and don't want to hurt any animal. But the deer population has becomes a hazard as so many cars get hit by deers while driving in the neighborhoods. Deers are in my backyard and even in front after it is dar. Some times I have to wait to come to the front door as thy are standing in my drive way. It is not safe for humans to have so much deer population.

Corr. ID: 20

Organization: Not Specified

Comment ID: 1023475

Organization Type: Unaffiliated Individual

Representative Quote: I frequently visit Anacostia and Kenilworth Parks and would like to see as healthy a forest ecosystem as possible. I have seen first hand how too much deer browsing negatively effects the forest on my family's land, and am excited to see active management take place for our natural areas in the District.

Corr. ID: 28

Organization: Not Specified

Comment ID: 1023476

Organization Type: Unaffiliated Individual

Representative Quote: From nearly daily walks in Ft DuPont and Chaplain the deer population is decimating the growth of new plants and the deer still appear under weight. The population is not sustainable. Also as a vector of Lyme disease, reducing the population is critical. I want the pros to thrive for future generations and reducing the deer population will greatly aid in that. Also, people may complain about killing the animals, or wanting to sterilize them which doesn't stop the decimation of new plants growth and forces them into neighborhoods in search of food, increasing the likelihood of accidents.

Response:

NPS acknowledges that visitors' experience may be negatively affected by damaged vegetation, tick-pathogen cycles, and deer-human interactions. The purpose of the proposed action is to develop a white-tailed deer management strategy that supports long-term protection, preservation, and restoration of native vegetation and cultural landscapes within parks administered by National Capital Parks - East. Actions to specifically address tick populations, diseases, and deer-human interactions are outside the scope of the Plan and do not meet the Plan's purpose, need, and objectives. While a reduction in deer density may contribute to a reduction in deer ticks carrying diseases, such as Lyme disease, and a reduction in deer-human interactions, it is uncertain exactly how much of an effect would occur as a result of the proposed action.

AL1030 - Alternatives: Range of Alternatives

Concern ID: 66146

***CONCERN
STATEMENT:***

A commenter stated that NPS has not considered a reasonable range of alternatives.

***Representative
Quote(s):***

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023346

Organization Type: Unaffiliated Individual

Representative Quote: The NPS has not considered a reasonable range of alternatives: NEPA requires agencies to consider a "reasonable range of alternatives." Here, however, the NPS considered a grand total to two alternatives - hardly a range. The two alternatives simply stated are to kill (the NPS preferred alternative) and not to kill (Alternative 1) - hardly a reasonable range of alternatives. It rejected reasonable alternatives such as using strategic fencing to protect sensitive/imperiled plant communities or to employ fertility control - via immunocontraceptives - to humanely reduce deer production rates until, over time, population management objectives are obtained (assuming that there is compelling scientific evidence - which is largely absent from the DEA - suggesting that the deer population in the NCPE parks must be controlled.

Response:

The NPS believes that it has developed and presented an adequate range of alternatives within the Plan to satisfy the purpose, need, and objectives of the Plan as required by NEPA. The alternatives assessed, including those alternatives considered and dismissed, capture the full range of options required by the CEQ regulations. The non-lethal alternatives were studied and were not considered appropriate or viable as discussed on pages 12 and 13 of the EA. The action alternative carried forward in the EA represented the only alternative that the NPS believed was reasonable to implement and had a high potential to successfully achieve the purpose and objectives of the Plan.

Concern ID: 66147

**CONCERN
STATEMENT:**

Commenters suggested that NPS should study the conditions at each individual park and that individual parks should have their own criteria for management.

**Representative
Quote(s):**

Corr. ID: 57

Organization: City Wildlife, Inc.

Comment ID: 1023347

Organization Type:
Conservation/Preservation

Representative Quote: The proposal would add a substantial number of new land units to the existing NCRN deer management program. NPS must demonstrate for each parcel that both deer as well as plant communities have been studied and monitored to no less a standard than has been the case elsewhere. Each unit has its own set of issues and criteria for management and a "one size fits all" approach does not provide a sufficient or justifiable basis for management action.

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023348

Organization Type:
Conservation/Preservation

Representative Quote: These park units not only differ from one another in many ways, but they also engage a broad spectrum of the public. Due to the complexity of the many park units and the comprehensive analysis that must be conducted in order to understand these systems and how they relate to the presence of deer we believe that this EA is insufficient in its analysis.

Response:

An annual operations plan will be developed for each park. The operations plan will take into consideration the conditions at individual parks and will include the number of deer to be culled and procedures for culling within each park. The criterion for management, greater than 15 to 20 deer per square mile, is the same for each individual park because this is the deer density level that would allow for the tree regeneration goal of the Plan.

AL1040 - Alternatives: Cost

Concern ID: 66148

**CONCERN
STATEMENT:**

Commenters requested information on the costs of various elements of the project. Commenters wanted a breakdown on the costs of deer culling on a per deer basis, as well as potential recurring costs on an annual basis. Commenters also requested information regarding where the resources for these costs would be obtained. Commenters requested that the cost of the proposed deer control be compared to the costs of non-lethal methods such as immunocontraceptives.

**Representative
Quote(s):**

Corr. ID: 57

Organization: City Wildlife, Inc.

Comment ID: 1023350

Organization Type:
Conservation/Preservation

Representative Quote: We asked in scoping comments that the EA address the economics of deer control, stipulate what average annual costs are likely to be in NACE, identify where those resources will come from, and justify costs as providing a greater benefit to resource protection than other programs aimed at the same objectives. This was not done and we strongly recommend that this information be made available to the public.

Corr. ID: 65

Organization: Not Specified

Comment ID: 1023353

Organization Type: Unaffiliated Individual

Representative Quote: NPS should do a thorough cost comparison of culling and contraception/sterilization rather than providing the false alternatives of doing nothing or culling the deer presented in the assessment.

Response:

The cost for deer culling, based on deer management at other parks in the National Capital Area, ranges from \$8,000 to \$12,000 per day of culling activities. These costs include personnel time, housing of personnel, equipment, CWD sampling, setting up and monitoring bait stations, and removal and processing of carcasses, and annual reporting. The cost per deer removed varies widely based on the area where the culling occurs and the number of deer removed.

NPS has not developed a cost estimate for immunocontraception because none of the available methods meet the NPS requirements for use (EA pages 12 and 13). To create such an estimate, similar tasks would be included like housing of personnel, CWD sampling, and setting up and monitoring bait stations. Use of immunocontraception would incur the cost of the immunocontraceptive, personnel

time, housing of personnel, and equipment to administer two doses of the drug per deer initially with an additional annual dose; and annual reporting. Use of immunocontraception would also incur the additional administrative expense of tracking deer to ensure that the same deer are treated annually. After all these efforts, deer population densities would remain high, and forest regeneration goals would not be achieved.

AL1060 - Alternatives: Considered and Dismissed - Non-lethal Methods for Deer Management

Concern ID: 66149

**CONCERN
STATEMENT:**

A commenter stated that NPS has excluded the public's wishes for non-lethal management approaches.

**Representative
Quote(s):**

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023354

Organization Type:
Conservation/Preservation

Representative Quote: And since this plan is predisposed to a narrow view of factors leading to outcomes that will include unnecessary killing, the plan significantly excludes the public's wishes for non-lethal management approaches to conflicts with wildlife within our national parks.

Response:

The public was provided the opportunity to comment through the project scoping process and through review of the Plan. During these public comment opportunities, some members of the public voiced support for non-lethal deer management measures, while others voiced support for lethal measures. While NPS considers the comments provided by the public, final decisions must be based on NPS Management Policies and on an assessment of which management approach will best meet the purpose of and need for the Plan.

Concern ID: 66150

**CONCERN
STATEMENT:**

Commenters suggested that non-lethal methods of deer management be pursued before lethal methods and that additional consideration of non-lethal controls is needed. Other commenters stated that if lethal deer management is required, non-lethal practices should be added for comparison.

**Representative
Quote(s):**

Corr. ID: 6

Organization: Not Specified

Comment ID: 1023357

Organization Type: Unaffiliated Individual

Representative Quote: You should be finding non lethal methods. The public wants innovative ideas, not the same old garbage. You are being lazy. If nps staff is not up to the task, hire some new people who can THINK. You say there are no "known" non lethal means. That tells me you are just using that as an excuse and don't want to find any other ways.

Corr. ID: 77

Organization: Not Specified

Comment ID: 1023367

Organization Type: Unaffiliated Individual

Representative Quote: I strongly urge the NPS to reconsider its decision to only use lethal means to control the deer. Contraceptives have been proven effective in reducing deer populations.

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023374

Organization Type:
Conservation/Preservation

Representative Quote: Aside from lacking sufficient information to justify the broad application of lethal control across these 20 park units, it is our view that this EA and planning process is lacking in the presentation of information and consideration of the technologies and methodologies related to non-lethal approaches. That includes current research that is available and emerging in terms of fertility control technologies as well as silviculture management that includes strategic planting efforts, fencing, and other non-lethal tactics to address any legitimate plant or forest regeneration management concern.

Corr. ID: 97

Organization: Not Specified

Comment ID: 1023371

Organization Type: Unaffiliated Individual

Representative Quote: Please consider other methods, such as immunocontraception, which is much more effective and humane. Several scientific articles have demonstrated successful reductions in deer populations through contraceptives.

Response:

There are currently no fertility control agents that fulfill all of the criteria outlined in the EA (page 13). Other non-lethal controls such as fencing, landscape modification/plantings, and repellents are not feasible and would not meet the purpose, need, and objectives of the Plan. Fencing large areas of forest within the park is not feasible, requiring substantial staff installation and maintenance. Also, placing fencing throughout cultural landscapes would impact contributing landscape features. Fencing that keeps deer away from vegetation results in increased browsing pressure outside of the fenced area. Modifying the landscape to create fragmented woodland areas in currently contiguous forest would compromise the mission of the NPS by altering natural functions and processes of forest ecosystems. Modifying landscapes using interior meadows would fragment the woodland areas, creating more edge habitat favored by nonnative invasive plants and animals. Large-scale application of repellents is not practical due to high application cost, label restrictions on use, and variable or nonexistent effectiveness. See comment below for information on the feasibility of immunocontraceptives.

Concern ID: 66151

**CONCERN
STATEMENT:**

Commenters suggested that the NPS guidelines for evaluating non-lethal control are outdated and that NPS should revisit their safety and efficacy criteria for any immunocontraceptive vaccines. Commenters suggest that the NPS initiate a new safety and efficacy criteria planning process and involve input from experts and the public, as this input was not part of the decision-making process during the development of NPS' current safety and efficacy criteria. Commenters stated that there have been non-lethal agents that can be administered remotely, which is one of the criteria listed in the EA. Additionally, commenters stated that the standards for contraceptives should be equal to the other proposed types of control.

**Representative
Quote(s):**

Corr. ID: 47

Organization: Not Specified

Comment ID: 1023376

Organization Type: Unaffiliated Individual

Representative Quote: Why not use GonaCon, instead of killing the deer in Rock creek Park? It works on both males and females by stimulating the production of antibodies that interfere with the production of sex hormones called gonadotropins, thereby decreasing sexual activity and inhibiting reproduction "as long as a sufficient level of antibody activity is present," according to the USDA. The vaccine lasts several years and has been used to control populations of deer and wild horses in the U.S., wild cattle in Hong Kong and kangaroos in Australia.

GonaCon, which the U.S. Department of Agriculture's (USDA) National Wildlife Research Center developed in the early 1990s as a contraceptive for deer, according to a USDA description of the drug.

Corr. ID: 60

Organization: Not Specified

Comment ID: 1023383

Organization Type: Unaffiliated Individual

Representative Quote: Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular:

- NPS instructs in the draft Environmental Assessment that an agent must be able to be administered remotely. This has already been demonstrated and published in scientific journals- -thus NPS should update their review to include this standard along with numbers 1 and 4 as already having been met.

Corr. ID: 62

Organization: Not Specified

Comment ID: 1023387

Organization Type: Unaffiliated Individual

Representative Quote: While I am in support of controlling the deer population, I urge you to please revisit the guidelines for evaluating non-lethal methods of control. The criteria that the National Park Service uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular: NPS instructs in the draft Environmental Assessment that an agent must be able to be administered remotely. This has already been demonstrated and published in scientific journals- - thus NPS should update their review to include this standard along with numbers 1 and 4 as already having been met.

Corr. ID: 74

Organization: Not Specified

Comment ID: 1023378

Organization Type: Unaffiliated Individual

Representative Quote: TNR, or using contraceptives, has been shown to not only be effective with feral cats, but deer and other animals as well. It ensures that strong bucks still keep their harems, so only they mate with them. A castrated buck, or who is on a contraceptive, will prevent unaltered bucks from mating with his does ensuring they all don't become pregnant. And keeping does on contraceptives is easier to monitor when they stay in the same herd, rather than being thrown about by various bucks.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023400

Organization Type: Unaffiliated Individual

Representative Quote: The refusal of the NPS to consider immunocontraception as a management alternative - either stand-alone or as a package of management actions - is indicative of an agency that, inexplicably, refuses to consider new, humane, and effective management strategies in favor of the traditional gun and bullet. In other words, if you reportedly have a deer overabundance problem, shoot your way to a solution. The NPS dismisses immunocontraception as a management tool "due to issues related to effectiveness, animal treatment and long-term deleterious behavioral effects, and the cost, staff time, and management that would be required." Not only did the NPS provide no information or analysis to justify its dismissal of immunocontraception as a management strategy but it also failed to explain the origins of the criteria. The NPS created its immunocontraception criteria at an NPS-only meeting and, in my opinion, intentionally designed the criteria to avoid having to utilize a humane strategy to effectively manage deer. Regardless, instead of simply dismissing immunocontraception out of hand for no credible reason, the NPS has entirely failed to conduct any type of substantive analysis of the pros and cons of the different immunocontraceptive agents. While it could have - and should have - consulted with the various scientists actively engaging in the development of new immunocontraceptive agents and/or employing them in the field, including in open deer populations, it has elected to effectively bury its head in the sand. It concedes that there is now one immunocontraceptive agent that satisfies criteria 1 and 4 of its immunocontraception standards, but fails to even identify that agent.

The lack of any meaningful and substantive analysis of the science of immunocontraception, the safety and efficacy of existing vaccines, the development of new vaccines, and the results obtained from employing such vaccines in the field on deer is precisely why, among many other reasons, and EIS is necessary to fully and comprehensively evaluate this technology as an effective tool to humanely manage deer. Furthermore, instead of allowing the "perfect to get in the way of the good," the NPS must revisit its immunocontraceptive criteria through a transparent

process involving knowledgeable non-NPS scientists and provide the public with an opportunity to participate in the process to develop less biased and more up-to-date criteria. The NPS, instead of trying to avoid the use of immunocontraceptives to manage wildlife on its lands, particularly considering that it does and has allowed such vaccines to be used in a handful of parks, it should embrace its potential role as a natural laboratory to advance the study of humane wildlife conflict/impact mitigation tools.

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023402

Organization Type:
Conservation/Preservation

Representative Quote: We do not agree with NPSs statement that there are no non-lethal deer management population control methods that are effective in an open, free-ranging population. That is not an accurate statement. There has been and there is emerging evidence that immunocontraception can be effective in reducing population in open systems and NPS should consider this non-lethal option. At the very least a pilot program to better understand these technologies and the implementation of them is warranted to trial within the agency. But this control action should be justified in the same way that we have called for lethal control actions to be justified - through the process of collecting baseline data regarding impact for each park unit and setting achievable goals for a program that can be monitored and evaluated for success on an ongoing basis.

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023403

Organization Type:
Conservation/Preservation

Representative Quote: The efficacy and remote delivery of immunocontraceptives have been demonstrated in deer in both closed and open systems. The capacity of native PZP and PZP-22 to stabilize and reduce white-tailed deer populations in some suburban environments has been well established (Rutberg and Naugle 2008; Rutberg et al. 2013), and active research taken on by scientists aimed at increasing the practical use of PZP and PZP-22 as part of a fertility control program are underway.

These vaccines have proved to be a successful contraceptive in wildlife and have other desirable attributes: (1) they prevent pregnancy an average of 90% of the time in treated animals, (2) they can be delivered remotely by dart, (3) the contraceptive effects are reversible, (4) they are effective across many species, (5) there are no debilitating health side-effects even after long-term use, (6) they have almost no effect on social behaviors, (7) the vaccine cannot pass through the food chain (it is

safe to consume treated animals that have been harvested) and (8) they are safe to give to pregnant animals.

The PZP vaccine has been shown to be an effective contraceptive management tool on island populations of white-tailed deer as early as 1990. Since that time, numerous projects have been mounted with both island populations and open systems in MD, NJ, NY, CT, WA, VA, SC and OH. The two largest long-term deer fertility control research projects involving the use of immunocontraceptives were on Fire Island National Seashore (FINS), NY, where a project was begun in 1993 and extended through 2009 and on the campus of the National Institute of Standards and Technology (NIST) in MD, where immunocontraceptive treatment of deer began in 1994 and continued for 20 years. In both these programs the deer population was decreased significantly.

Response:

The criteria included in this Plan adhere to NPS policy, and there are currently no fertility control agents available for wild, free-ranging white-tailed deer that fulfill all of the criteria. Additional information on these criteria is outlined below.

Criterion 1 - The reproductive control agent is federally approved for application to free-ranging populations. It is critical that all aspects of a fertility control program be consistent with federal laws and regulations and NPS policies. Environmental Protection Agency (EPA) regulates free-ranging wildlife immunocontraceptives under the Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et seq.). GnRH vaccine GonaCon™ and PZP (ZonaStat-D™) are approved for use in white-tailed deer; however, GnRH nor PZP have not met more than two of the additional five criteria listed below (criteria 2-6).

Pharmaceutical reproductive control agents (e.g., leuprolide, prostaglandins) are regulated by the Food and Drug Administration (FDA) and can be applied for management purposes under the Animal Medicinal Drug Use Clarification Act within a valid veterinarian-client patient relationship. Products regulated by the FDA can be used for research purposes under an Investigational New Animal Drug (INAD) exemption. However, none of the potential contraceptive pharmaceuticals meet all of the additional criteria listed below.

Criterion 2 - The agent provides multiple year (more than 3 years) efficacy: Modeling efforts have clearly demonstrated that (1) “the efficacy of fertility control as a management technique depends strongly on the [multi-year] persistence of...the fertility control agent;” and (2) the only scenarios in which fertility control is more efficient than culling at maintaining population size is when a multi-year efficacy is achieved (Hobbs et al. 2000). Modeling efforts (Hobbs et al. 2000; Rudolph et al. 2000; Merrill et al. 2006) and a comparison of field efforts that used lethal (Frost et al. 1997) and non-lethal methods (Rutberg and Naugle 2008) have shown that fertility control and sterilization are not as effective or efficient as culling when the goal is to reduce white-tailed deer populations to allow for tree regeneration and vegetation recovery. Hobbs et al. described a model where if 90% of the breeding does in the park were effectively treated annually, mortality would need to exceed the number of surviving offspring from the 10% of untreated does to achieve a population reduction. An average mortality rate in urban/suburban deer populations is 10% (Hobbs et al. 2000). Based on these factors, it is expected that reproductive control could stop

population growth, but the park would not be able to reach its initial desired deer density within the life of this Plan using current technology.

In addition to increasing the efficiency of a fertility control program, the multi-year efficacy requirements benefit and protect individual deer because they reduce the frequency of stressful capture and/or drug delivery operations. As noted in Criterion 3, efficacy of ZonaStat-D™ is maintained by annual booster doses; therefore, requiring drug delivery to the same does every year.

Criterion 3 - The agent can be administered through remote injection to reduce the frequency of stressful capture and/or drug delivery operations: GonaCon™ must be administered by hand injection requiring capture of does for each dose. While ZonaStat-D™ can be administered remotely (e.g., via a syringe dart fired from a CO2 or cartridge-powered projection system), for maximum efficacy, it must be administered in two doses with an initial priming dose followed by a booster dose at least two weeks later. Efficacy of ZonaStat-D™ is maintained by annual booster doses. To provide booster doses, does would need to be captured for the initial application, marked, and tracked to administer booster doses. These steps would add stress to the animals and be considerably more complex and time consuming than lethal methods.

Criterion 4 - The agent would leave no residual in the meat (meat would be safe for human consumption): Any fertility control agent applied in free-ranging wildlife populations that are contiguous with areas or with the same species that are hunted must be safe for human consumption, either immediately after delivery or after an established withdrawal period. While the NPS understands that antibodies induced by immunocontraceptives do not pose a human health risk, only the regulatory agency can make a claim of appropriateness for human consumption.

Criterion 5 - There is substantial proof that the contraceptive control agent can be successful in reducing a free-ranging deer population based on scientific review: Studies have demonstrated that fertility control agents (e.g., PZP) can be used to reduce closed deer populations in small areas (less than 1 square mile; Rutberg and Naugle 2008). However, no study has demonstrated that fertility control reduces deer numbers in free-ranging populations to the extent needed to allow for adequate tree regeneration. With immunocontraceptives, deer density targets set by parks like Fire Island National Seashore were never met after trying for 16 years (1994-2009) (Fire Island National Seashore Deer Management Plan) (NPS 2022). PZP was used on Fire Island as part of a larger research study from 1993 to 2009. In one area (Kismet to Lonelyville), PZP reduced deer numbers. However, in other areas, PZP was not successful in reducing the number of deer over time due to logistical challenges associated with implementing fertility control treatments (Rutberg and Naugle 2008; NPS 2015).

There is evidence that a multi-year fertility control agent can be as efficient or even more efficient (compared to culling) when the deer density target is to maintain a population at a particular level (this also assumes all animals are marked and identifiable) (Hobbs et al. 2000). However, modeling efforts show that meaningful population reductions (e.g., >50%) would be difficult and inefficient compared to culling when conducted on free-ranging, large populations over a large area (Hobbs et al. 2000; Merrill et al. 2006). In addition to scientific review, the NPS would ensure that NPS management policies are met by any non-lethal alternatives selected by the park for use.

NPS reviews the status of ongoing reproductive control research in consultation with subject matter experts and reviews of new publications. When immunocontraceptive technology advances and it could benefit NPS deer management, a nonsurgical alternative would be reviewed based on how well it meets availability, cost, efficacy, duration, safety, feasibility, and the five NPS implementation criteria.

Concern ID: 66152

**CONCERN
STATEMENT:**

Commenters noted that the Environmental Assessment states that for an immunocontraceptive to be considered viable, it must be effective for 3 years, but that preferred approach for deer management (lethal control) is a process that takes more than three years. They further stated that the standard for contraceptives should be equal with standards for other types of control.

**Representative
Quote(s):**

Corr. ID: 63

Organization: Not Specified

Comment ID: 1023404

Organization Type: Unaffiliated Individual

Representative Quote: Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular...

NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a process that takes more than three years. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

Corr. ID: 66

Organization: DC Voters for Animals - Ed Fund

Comment ID: 1023407

Organization Type:
Conservation/Preservation

Representative Quote: Criterion 2 requires that vaccines have more than three years of efficacy. However, that criteria is not satisfied by NPS' own preferred alternative in the draft Environmental Assessment- -lethal control. An inconsistency is demonstrated because lethal control itself is not effective after 3 years, it requires continuous rounds of culling year after year. The EA describes the proposed alternative as "Quickly reducing the deer population within 5 years". The criteria for contraceptives should be adjusted based on the instance of multiple treatments, in which there is scientific evidence that supports the three year criterion.

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023415

Organization Type:
Conservation/Preservation

Representative Quote: the NPS criteria describing the threshold needed to utilize a fertility control method are not also applied to lethal control programs.

Response:

The commenters have misinterpreted the intent of Criterion 2 (The agent provides multiple year (more than 3 years) efficacy). The criterion states that the vaccine must be effective in an individual doe for at least three years. The criterion is not stating that the vaccine must reduce the population to target level in three years.

The 3-year efficacy for immunocontraceptives is required because, modeling efforts have clearly demonstrated that (1) "the efficacy of fertility control as a management technique depends strongly on the [multi-year] persistence of...the fertility control agent;" and (2) the only scenarios in which fertility control is more efficient than culling at maintaining population size is when a multi-year efficacy is achieved (Hobbs et al. 2000). In addition to increasing the efficiency of a fertility control program, the multi-year efficacy requirements benefit and protect individual deer because they reduce the frequency of stressful capture and/or drug delivery operations. As noted in Criterion 3, efficacy of ZonaStat-D™ is maintained by annual booster doses, requiring drug delivery to the same does every year.

The time frame for reaching the desired deer density and seeing results in forest regeneration is 5 to 10 years. This timeframe currently can be reached using the lethal means as is seen in other national parks. Deer management programs administered by NPS, Maryland DNR, Montgomery, Prince George's, and Anne Arundel Counties have documented the successful reduction in deer population densities with lethal deer management programs. For example, Gettysburg National Military Park met its desired deer density of 25 deer per forested square mile after 11 consecutive years of deer management. Park-wide deer density at Gettysburg was 325 deer per forested square mile (Bowersox et al. 2002) and they cull annually to sustain this density. Montgomery County has been actively addressing deer overabundance since 1995. Montgomery County, Maryland has reduced deer densities from 63-160 deer per square mile to less than 30 per square mile at four parks after 7 to 9 years of deer management (Montgomery County Department of Parks 2012).

Concern ID: 66153

**CONCERN
STATEMENT:**

Commenters suggested that feasibility criteria for non-lethal control be reevaluated in the EA due to inconsistencies in five criteria and advancements in contraceptives.

**Representative
Quote(s):**

Corr. ID: 66

Organization: DC Voters for Animals - Ed Fund

Comment ID: 1023417

Organization Type:
Conservation/Preservation

Representative Quote: Criterion 3 indeed can already be met-it has been demonstrated in McShea et al (1997) in which deer were captured and administered PZP in Front Royal, VA. Thus it is quixotic why NPS has not deemed this requirement satisfied, as they have for criteria 1 and 4. Criterion 3 does not specify limitations-such as whether the capture must be done within specific boundaries, or if there are economic limitations. If the latter, we would welcome an economic comparison of administering contraceptives as compared to lethal control given that sharpshooting requires more visits to be successful on a continuing basis. These unidentified reasons for ruling Criterion 3 as being unsatisfied are further justification for the set of guidelines to be revisited and reevaluated.

Corr. ID: 66

Organization: DC Voters for Animals - Ed Fund

Comment ID: 1023416

Organization Type:
Conservation/Preservation

Representative Quote: We request the National Park Service revisit the guidelines for considering viable contraceptives and include updates to the draft Environmental Assessment. Not only have contraceptives improved since these guidelines were developed, the criteria are at such an unrealistic high bar that they inaccurately represent the real-world potential for contraceptives. In the draft Environmental Assessment, NPS writes that of the five criteria, numbers 1 and 4 are satisfied by current contraceptive technologies. Yet, the determination for the other three criteria have shortcomings that are inherent to the standard or misrepresent the state of technology.

Corr. ID: 66

Organization: DC Voters for Animals - Ed Fund

Comment ID: 1023418

Organization Type:
Conservation/Preservation

Representative Quote: Criterion 5 refers to unspecified standards for population control. What threshold is needed for NPS to consider an agent "successful in reducing a free-ranging deer population"? How would it be measured and over what timeframe? NPS should be explicit in what is needed to demonstrate success- any attempts to be vague appear as a means to bias the results of the EA toward a predetermined preferred alternative. Given the many inconsistencies of the 5 criteria for non-lethal control and the advancements in the state of contraceptives, a second look at both the criteria and the ability of current agents to meet the guidelines is warranted.

Corr. ID: 84

Organization: A Vegan Life, Inc.

Comment ID: 1023419

Organization Type:
Conservation/Preservation

Representative Quote: Let's use a humane response to control any perceived overpopulation. I suggest birth control. NPS instructs in the draft Environmental Assessment that an agent must be able to be administered remotely. This has already been demonstrated and published in scientific journals- -thus NPS should update their review to include this standard along with numbers 1 and 4 as already having been met.

Response:

The criteria included in this Plan are relatively straightforward in terms of NPS policy. NPS concurs that advancements in reproductive control agents have occurred, but neither of the currently approved controls (GonaCon™ and ZonaStat-D™) meet NPS criteria.

Concern ID: 66154

**CONCERN
STATEMENT:**

A commenter noted that the EA states that the NPS will review reproductive control research on a periodic basis. The commenter requested additional information regarding this review and the time frame and extent with which it will occur.

**Representative
Quote(s):**

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023421

Organization Type:
Conservation/Preservation

Representative Quote: This EA notes the NPS determined criteria of reproductive control and it also states that NPS would review the status of ongoing reproductive control research on a periodic basis through consultation with subject matter experts and review of new publications. How, when and to what extent is this occurring? What process is in place for this review and what information can be supplied regarding that consultation?

Response:

NPS reviews the status of ongoing reproductive control research in consultation with subject matter experts and reviews in new publications. When there are advances in non-lethal technology and the advances could benefit NPS deer management, these technologies would be reviewed based on how well they meet the five NPS policy criteria, availability, efficacy, delivery, safety, and success.

Concern ID: 66155

**CONCERN
STATEMENT:**

Commenters suggested that fencing and repellents are effective at protecting vegetation. A commenter also suggested that strategic fencing was not considered as an alternative due to perceived impacts to cultural landscapes, but that fencing could be installed to ensure it does not harm cultural resources.

**Representative
Quote(s):**

Corr. ID: 69

Organization: Not Specified

Comment ID: 1023422

Organization Type: Unaffiliated Individual

Representative Quote: Fencing and repellents are also effective at protecting vegetation yet NPS has rejected that option.

Corr. ID: 71

Organization: Not Specified

Comment ID: 1023423

Organization Type: Unaffiliated Individual

Representative Quote: However, if the Park Service rejects the No Action alternative, I urge the NPS to reconsider its decision to use only lethal means to control the deer...Fencing and repellents are also effective at protecting vegetation.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023425

Organization Type: Unaffiliated Individual

Representative Quote: While strategic fencing should have been considered as a stand-alone alternative, it also could have - and should have - been considered as part of a more holistic alternative incorporating a variety of management strategies. According the NPS, the use of strategic fencing was jettisoned from consideration in the DEA because it "would not be feasible due to the staff installation and maintenance that would be required to protect the large, forested areas within National Capital Parks - East and due to the potential impacts of placing fencing throughout cultural landscapes." While it is not clear what is meant by "staff installation," none of these excuses hold any water as the NPS, as it has done in other parks, can install such fences preceded by cultural landscape inventories to ensure that fence placement does not harm cultural resources.

Response:

Fencing the large areas of forest within the parks is not feasible as it would require excessive installation and maintenance efforts by NPS staff in order to protect the large forested areas within National Capital Parks - East, and placing fencing throughout could have substantial impacts on cultural landscapes. In addition, fencing that keeps deer away from vegetation results in increased browsing pressure outside of the fenced area. Large-scale application of repellents is not practical due to high application cost, label restrictions on use, and variable effectiveness.

AL1080 - Alternatives: Considered and Dismissed - Other Lethal Alternatives

Concern ID: 66157

***CONCERN
STATEMENT:***

Commenters suggested that the public should be allowed to participate in hunting, including archery/bow programs.

***Representative
Quote(s):***

Corr. ID: 3

Organization: Not Specified

Comment ID: 1023427

Organization Type: Unaffiliated Individual

Representative Quote: The NPS should create an urban deer hunting season much similar to Alexandria, VA and Arlington, VA. This would allow hunters to harvest deer for personal consumption and anything over the established limit could be processed for use at shelters or food banks. I do not feel only allowing sharpshooters hunting at night is the best plan. DC/NPS could host hunters education programs along with conservation education to keep a healthy population while improving the lands that are hunted. Culling members of the herds and not using the meat wisely seems to go against the most basic spirit of hunting.

Corr. ID: 4

Organization: Clean Streams LLC

Comment ID: 1023428

Organization Type:
Conservation/Preservation

Representative Quote: The deer population in PG County's suburban areas is totally out of control as noted in the report and anyone who frequents these parks. The State needs to allow bow hunters greater access to suburban and urban parks or this problem will never be controlled.

Corr. ID: 5

Organization: Not Specified

Comment ID: 1023429

Organization Type: Unaffiliated Individual

Representative Quote: For the deer management plan, I propose a deer hunt. 2 to 4 man teams of hunters, for accountability. The hunt will last for 3-5 hours (per event). Hunters will be issued GPS trackers to locate their position (loss of the tracker will result in a fine to pay for it). With the trackers, we'll be able to monitor their movement, and warn them if they're close to another hunting team. Recurve bows only at first, with possibility of compound and crossbow trials at a later date (depending on the results of the first hunt). Hunters will be allowed to keep the deer

harvested in the period, as well as compensation of \$50 for every deer harvested (payable to the one who brought it down).

As it goes without saying, no violence towards other hunters will be permitted. Any actions will result in swift expulsion via extraction teams, and law enforcement involvement if necessary. Emergency Response Personnel will be on site during the time of the event. All participants will sign a waiver releasing the jurisdiction/event coordination, and state of any liability (lost equipment, injury, death)

All contact info and addresses will be gathered ahead of the scheduled event. If possible, developing a basic functional app for the event would be preferable, so members will be easily contacted while not disrupting their hunt (via cell phone rings which would alert the deer)

Hunters are required to bring the deer down, swiftly and efficiently. Shoot it with the bow until its on the ground, and then to sever the jugular as to minimize suffering to the animals.

No alcohol will be permitted during the event, and anyone found violating will be fined/dealt with.

Corr. ID: 18

Organization: Not Specified

Comment ID: 1023430

Organization Type: Unaffiliated Individual

Representative Quote: how does one sign up to be a sharpshooter?

Response:

Congress has not authorized hunting in any legislation for National Capital Parks - East. Section 4.4.2.1 of NPS Management Policies 2006 states that the destruction of animals may be carried out by NPS personnel or their authorized agents. In some situations, authorized agents can be volunteers. As noted in the EA, skilled volunteers may be considered as authorized agents for lethal removal activities. The use of skilled volunteers, as identified in an annual operations plan, would be subject to regional review and written concurrence of the Area Director (EA page 10).

Experienced sharpshooters with the necessary qualifications, as determined by NPS, would be the primary method used for lethal removal activities. Sharpshooters would be certified in firearms training, specially trained in wildlife reduction, and would be required to pass a proficiency test to qualify to participate in reduction activities. Sharpshooters would also be provided park-specific safety training necessary to protect NPS personnel and visitors (EA page 10).

Concern ID: 66158

**CONCERN
STATEMENT:**

Commenters asked about donation of deer meat and suggested selling culled white-tailed deer meat and donating the proceeds or donating culled meat deemed unsuitable for human consumption to the National Zoo

**Representative
Quote(s):**

Corr. ID: 18

Organization: Not Specified

Comment ID: 1023432

Organization Type: Unaffiliated Individual

Representative Quote: Where does the meat go from the deer

Corr. ID: 44

Organization: Not Specified

Comment ID: 1023433

Organization Type: Unaffiliated Individual

Representative Quote: The service might also consider whether the National Zoo could utilize meat that is found unsuitable for donation for human consumption.

Response:

While it might be possible to sell the meat as surplus property under applicable federal regulations, the proceeds would go to the U.S. Treasury and would not be available for the donation suggested in the comment. Implementing such a sale would also involve considerable staff time and costs. Therefore, the park would donate meat, when feasible, to local charitable organizations or food banks as permitted by regulations and NPS guidelines.

AL1090 - Alternatives: Other Non-Lethal Alternatives

Concern ID: 66159

**CONCERN
STATEMENT:**

Commenters suggested providing residents with non-lethal means of deterring deer.

**Representative
Quote(s):**

Corr. ID: 15

Organization: Penn Branch Community Association Inc.

Comment ID: 1023434

Organization Type: Civic Group

Representative Quote: A small grant program that allows a resident to purchase sound alarms throughout their property, creating a fence of noise that merely scares them away from entering the residential property, where they can leave dangerous ticks, and poop,

Response:

The scope of the proposed action is to implement a white-tailed deer management plan within parks administered by National Capital Parks-East. NPS does not currently have grant programs for deer management on private property and the establishment of such a grant would require a Congressional mandate and appropriation.

Concern ID: 66160

**CONCERN
STATEMENT:**

Commenters suggested relocation of the deer to other areas.

**Representative
Quote(s):**

Corr. ID: 15

Organization: Penn Branch Community Association Inc.

Comment ID: 1023435

Organization Type: Civic Group

Representative Quote: I encourage all efforts used to reduce this population throughout the District of Columbia to be humane and the same measures selected to reduce this population in one ward should be exercised in all wards.

To assist with this effort, science should be used to feed them on NPS property that has a medication that puts them to sleep, so they can be picked up and taken to the upper mountainous areas of Maryland and Virginia.

Corr. ID: 19

Organization: Not Specified

Comment ID: 1023436

Organization Type: Unaffiliated
Individual

Representative Quote: Surely the deer can be transported to other locations, they shouldn't have to suffer because of the city's greedy desires to tear down their natural habitat.

Response:

Due to the concerns discussed above relating to policy, costs, feasibility, and high mortality, capture and release was dismissed as a reasonable alternative. Capturing deer within National Capital Parks - East would be in violation of NPS policy regarding translocation, outlined in a Director's CWD Guidance Memorandum of July 26, 2002 (NPS 2002a). Relocating deer would require permits. Concerns about possible CWD transmission would require quarantines. Given the abundance of deer in Maryland and most of the United States, recipients for such a program would be very limited. Also, live capture and relocation methods can result in high stress and mortality rates among captured and/or relocated deer. Implementation of this alternative could result in the death of more than 50% of the deer during the first year after release (Jones and Witham 1990). In one study only 15% of the relocated deer survived one year after relocation (O'Bryan and McCullough 1985).

AL2100 - Alternatives: Expanded Action

Concern ID: 66161

**CONCERN
STATEMENT:**

Commenters recommended taking a regional approach to culling and coordinating/consulting with other deer management programs in the area, and that deer management plans be coordinated with other agencies.

**Representative
Quote(s):**

Corr. ID: 1

Organization: Not Specified

Comment ID: 1023437

Organization Type: Unaffiliated Individual

Representative Quote: I also believe that the planned population reduction should be increased.

Corr. ID: 7

Organization: Not Specified

Comment ID: 1023438

Organization Type: Unaffiliated Individual

Representative Quote: Count governments should take steps to reduce deer population in neighborhoods.

Corr. ID: 10

Organization: Not Specified

Comment ID: 1023439

Organization Type: Unaffiliated Individual

Representative Quote: I hope this can be expanded to other parts of the region outside NPS jurisdiction since this is a larger problem than just the parks.

Corr. ID: 57

Organization: City Wildlife, Inc.

Comment ID: 1023440

Organization Type:
Conservation/Preservation

Representative Quote: We asked in our scoping comments that NPS identify how it has, or will, coordinate its management plans with state and local agencies. The EA indicates some effort to coordinate with District officials but does not speak to how it might coordinate with neighboring state wildlife agencies.

Response:

The purpose of the proposed action is to develop a white-tailed deer management strategy that supports long-term protection, preservation, and restoration of native vegetation and cultural landscapes within parks administered by National Capital Parks - East while maintaining a viable white-tailed deer population. Management of wildlife populations, including white-tailed deer, outside the park boundary, is the responsibility of the outside property owners, and the park does not have the authority to act or force action outside of park boundaries. But the park has a long history of working cooperatively with surrounding jurisdictions to encourage decision-making that promotes the protection of park resources. Other deer management programs are being administered by federal, state, and local jurisdictions, including Department of Defense Fort George G. Meade, Maryland Department of Natural Resources, Anne Arundel County, and the Maryland-National Capital Park and Planning Commission in Prince George's and Montgomery Counties.

Concern ID: 66162

**CONCERN
STATEMENT:**

Commenters recommended expanding the proposed action to include NPS easements in the Greenbelt Forest Preserve, the lands comprising the Northern Annex of Piscataway Park that lie to the east of Fort Washington Park, the Forts, and other parks in the DC area.

**Representative
Quote(s):**

Corr. ID: 44

Organization: Not Specified

Comment ID: 1023441

Organization Type: Unaffiliated
Individual

Representative Quote: Accordingly, I write in support of the Park Services proposal to engage in lethal control as warranted and necessary to bring the long-term deer population into closer line with healthy density levels. I am writing to underscore and emphasize the need to include the lands comprising the Northern Annex of Piscataway Park, that lie to the east of Fort Washington Park, within the management area.

Corr. ID: 52

Organization: Not Specified

Comment ID: 1023442

Organization Type: Unaffiliated
Individual

Representative Quote: I have one request:
I am a resident of Greenbelt and live right next to the Greenbelt Forest Preserve which is adjacent to the Baltimore Washington Parkway. I would like to request that the management plan includes the area of the scenic easement that NPS holds in the Greenbelt Forest Preserve. This is an excellent location to safely set bait stations along the parkway.

Corr. ID: 54

Organization: Not Specified

Comment ID: 1023443

Organization Type: Unaffiliated
Individual

Representative Quote: Please consider a deer management program for the Forts and other parks in the DC vicinity.

Response: The NPS is limited to undertaking deer management activities within lands it administers. While the NPS has a scenic easement within the Greenbelt Forest Preserve, the easement was established for the purpose of preserving scenic enjoyment of the Baltimore-Washington Parkway by the public and is limited to that use as the underlying property is owned and managed by the City of Greenbelt. The Plan includes all portions of Piscataway Park, Fort Washington Park, and the Fort Circle Parks that are administered by the National Park Service.

Concern ID: 66163

CONCERN STATEMENT: Commenters stated that once deer culling has occurred, the increased seedling density could include non-native or invasive species and that deer management should include invasive removal as well.

Representative Quote(s): **Corr. ID:** 14 **Organization:** Kemp Mil Civic Association

Comment ID: 1023444 **Organization Type:** Unaffiliated Individual

Representative Quote: If you look at other local jurisdictions that have embarked on deer culling, such as the MNCPPC, you will find that seedling density will go up after sustained culling operations. (Wheaton Regional Park is a great example. They've had sharpshooting since about 2005.) The issue is what kind of seedlings grow. We have a huge problem here of invasives like the Tree of heaven, Japanese stilt grass, mile-a-minute- porcelain berry etc. These plants provide little benefit to local wildlife. Once you reduce the deer population, the undergrowth will shoot up including tons of plants that choke out natives.

Please consider embarking on invasive removal before sharpshooting. You could even use scientific method of different approaches in different parks. Some parks you could do invasive removal. Other parks you could do sharpshooting and invasive removal. And in yet other parks you could just do sharpshooting. After 10 years I would argue the best results would come from both sharpshooting and invasive removal.

Corr. ID: 49 **Organization:** Not Specified

Comment ID: 1023445 **Organization Type:** Unaffiliated Individual

Representative Quote: Furthermore, combined with this method, removal of invasive species from the park land would also allow for the native plants to have more room to continue growing, diversifying, and stabilizing the ecosystem.

Response: This Plan is not a comprehensive vegetation management plan. However, NCRN I&M, which includes National Capital Parks - East, studies the status and long-term trends of exotic trees and shrubs, exotic understory plants, and vines on trees to determine which plants are spreading throughout the region and what effect they are having on native plants. Current management guidelines and practices for the parks target the control of invasive plants as a top priority, and NPS uses volunteers, park staff, a contractor, and the National Capital Area Invasive Plant Management Team to control invasive plants in the park's natural areas.

AL2110 - Alternatives: Introduction of Natural Predators

Concern ID: 66164

CONCERN STATEMENT: Commenters suggested introducing natural predators to the control the deer population.

Representative Quote(s):

Corr. ID: 16

Organization: Not Specified

Comment ID: 1023446

Organization Type: Unaffiliated Individual

Representative Quote: Is there any way to introduce predators like wolves or coyotes into parks in the DC area? They would take care of the excess deer population.

Corr. ID: 43

Organization: Not Specified

Comment ID: 1023447

Organization Type: Unaffiliated Individual

Representative Quote: I challenge and question the means of managing that population through sharpshooters. The EA states that it will control the deer population through sharpshooters as a matter-of-fact and doesn't give any consideration to a historically natural and proven means of prey population control, the reintroduction of an apex predator, i.e. the grey wolf. The White-Tailed Deer Management Plan EA should study the effects of reducing the deer population through the reintroduction of a historically-native apex predator, i.e. the grey wolf...I would like your biologist to weigh-in on the merits and drawbacks of reintroducing wolves to cull the deer population. Thank you.

Corr. ID: 49

Organization: Not Specified

Comment ID: 1023448

Organization Type: Unaffiliated
Individual

Representative Quote: I would recommend further research into natural predators for the white-tailed deer, such as wolves, coyotes, and bobcats, and the reintroduction or rehabilitation of their populations to provide a more natural method of keeping the ecosystem in check. This, in turn, would negate the necessity for humans to be considered the white-tailed deer's only predator via hunting in order to keep populations under control. While hunting may seem to be the easiest course of action, that does not necessarily mean that it is environmentally justified as the truest answer to the problem. The reintroduction of natural predators would serve to naturally push both populations into a mutual existence that would keep both in check, thus alleviating the need to kill half of the white-tailed deer population.

Response:

Coyotes and black bears are established in Maryland; coyotes are also settling in the Washington, DC, area. Both predators take advantage of vulnerable deer such as fawns or sick individuals and have not demonstrated a consistent ability to control deer populations. Even though coyote populations have increased, and the coyote's range has expanded in the past 20 years, deer populations have increased simultaneously in many of the same areas. Biologists believe that coyotes are partly responsible for declining deer numbers in some areas, but changes in deer populations in other areas appear unrelated to coyote density. There is no evidence that coyotes can effectively reduce and control white-tailed deer populations to the levels prescribed in the Plan (Coffey and Johnston 1997; Gompper 2002). Wolves are efficient deer predators, but they have been eliminated from much of the United States. Introducing or augmenting their presence in these parks would not be feasible due to a lack of suitable habitat. Wolves have home ranges averaging 30 square miles when deer are their primary prey (Mech 1990). Also, most of National Capital Parks - East lands are surrounded by and include an urban or suburban environment, making it impractical for additional predators to be reintroduced, and also given the possible adverse effects on surrounding rural or suburban residents, especially safety of children and pets.

AL2120 - Alternatives: Coordinate with Tribal Organizations for Deer Management

Concern ID: 66165

**CONCERN
STATEMENT:**

Commenters suggested coordinating with Tribal groups to manage deer hunting and forest restoration including allowing individuals with Tribal hunting licenses to participate in culling or providing deer that have been culled to Tribal groups for use in traditional arts and cultural practices.

**Representative
Quote(s):**

Corr. ID: 44

Organization: Not Specified

Comment ID: 1023449

Organization Type: Unaffiliated
Individual

Representative Quote: In addition to the parameters set forth in the Service's Environmental Assessment (2021), and in program year 2 and beyond, please consider whether a program can be established to incorporate indigenous practitioners into the decision-making process for control of white tail deer on lands that state-recognized tribal members are currently displaced from. The Park Service should explore avenues to extend opportunities to participate in management decisions and, to the extent practicable, to participate in additional control measures.

Corr. ID: 56

Organization: Accokeek Foundation

Comment ID: 1023450

Organization Type:
Conservation/Preservation

Representative Quote: Loss of tree cover and vegetation presents a very real threat to Piscataway Park and to Mount Vernon's viewshed. Environmental conservation is also deeply intertwined with Indigenous cultural preservation and the stewardship of ancestral homelands. The Foundation is interested in developing a Native Habitat Restoration program in Piscataway Park, in collaboration with NPS, Piscataway Tribal members and groups, and other stakeholders. Working together, we hope to mitigate and reverse habitat degradation due to shoreline erosion, deer browsing, and the imbalance between native and invasive plants.

Management of deer and other wildlife is a critical element of protecting natural and cultural resources in Piscataway Park. Deer hunting, use of hides and deer meat, all are part of traditional Indigenous culture. As NPS considers impacts and how to reduce deer in the park, we encourage consultation with Native people to understand impacts of deer and how they might use deer hides and other materials for important traditional arts and cultural practices...

...The Accokeek Foundation encourages NPS's consultation with Tribal partners to identify impacts and opportunities presented by the deer management activities.

Response: Consultation initiation letters were sent to the Delaware Nation, Cedarville Band of Piscataway Indians, Catawba Indian Nation, Piscataway Conoy Tribe, Piscataway Indian Nation, Pamunkey Indian Tribe, the Eastern Shawnee Tribe of Oklahoma, and the Shawnee Tribe of Oklahoma on April 27, 2021. No comments were received from any of the Tribes. If opportunities exist as part of the deer management program, the National Capital Parks - East personnel may coordinate with the Office of Tribal Relations and American Cultures (TRAC) to further engage indigenous communities.

EC1000 - Environmental Consequences: Impact Analysis

Concern ID: 66176

CONCERN STATEMENT: Commenters stated that NPS has failed to fully disclose environmental impacts and utilize accurate scientific analysis in accordance with NEPA. The commenter further questioned the NPS impacts described in the EA.

Representative Quote(s): **Corr. ID:** 57 **Organization:** City Wildlife, Inc.

Comment ID: 1023482 **Organization Type:**
Conservation/Preservation

Representative Quote: NPS bases its management actions on the "best available science" (footnote 4). The EA establishes a justification for deer culling based on fewer than five cited peer-reviewed studies, with more than 20 references citing information from what represents 'gray' literature - information such as reports that have not been subject to rigorous qualified review. The EA directly acknowledges this and notes that its analysis: "...includes a qualitative assessment of how increases or decreases in deer overbrowsing affects vegetation, and how these effects result in the degradation or restoration of cultural landscapes." (EA: 26)...4
<https://www.nps.gov/subjects/science/science-to-work.htm>

Corr. ID: 92 **Organization:** Not Specified

Comment ID: 1023483 **Organization Type:** Unaffiliated Individual

Representative Quote: NEPA requires agencies to examine the environmental impacts of its actions before implementing those actions. Under NEPA, agencies must "insure that environmental information is available to public officials and

citizens before decisions are made and before actions are taken (and) [t]he information must be of high quality." 40 CFR §1500.1(b). Furthermore, "[a]ccurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." Id. NEPA requires full disclosure of all relevant information pertaining to the environmental impacts of the actions under consideration. Transparency, not secrecy, is key to the NEPA process. The NPS has grossly failed to even remotely meet those standards in the DEA. Furthermore, the lack of information and analysis in the DEA suggests that this is merely a make-work exercise for the NPS which apparently prefers that interested stakeholders simply trust the agency to responsibly manage the parks, including deer, instead of proving that its proposed action is the best strategy to pursue.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023484

Organization Type: Unaffiliated
Individual

Representative Quote: The NPS effectively attributes a wide variety of impacts to park vegetation, forests, small mammals, birds, insects, imperiled/sensitive species, and cultural resources/landscapes, and adverse impacts to human health and safety to deer while providing little data to substantiate such claims. Where data is provided, the NPS fails to provide sufficient details to facilitate public understanding and evaluation of the information.

Response:

The EA provides a qualitative assessment of how expected changes to park vegetation under the No Action and Proposed Action Alternatives would affect resources, including vegetation, small mammals, birds, insects, imperiled/sensitive species, and cultural resources/landscapes, and human health and safety. The analysis in the EA and the impact assessment are based on review of existing conditions including resources studies and information collected from NPS personnel; published scientific studies quoted in the Plan; as well as the results of other deer management actions undertaken by NPS in the region (White-tailed Deer Management Plans for Catoctin Mountain Park (NPS 2008), Rock Creek Park (NPS 2011b), Antietam and Monocacy National Battlefields and Manassas National Battlefield Park (NPS 2014b), and the Chesapeake and Ohio Canal and Harpers Ferry National Historical Parks (NPS 2017b).

Concern ID: 66177

**CONCERN
STATEMENT:**

A commenter stated that the document is not consistent with NEPA since the Draft EA does not provide an assessment of cumulative impacts.

**Representative
Quote(s):**

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023485

Organization Type: Unaffiliated Individual

Representative Quote: The NPS has failed to adequately consider the cumulative impact of its actions:

NEPA requires federal agencies to consider the cumulative impacts of their actions. "Cumulative impacts" is defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 CFR §1508.27. The DEA contains no assessment of the cumulative impacts of the proposed lethal deer management plan and, therefore, violates NEPA.

Response:

The CEQ regulations referenced by the commenter were updated in 2020, and the quoted requirements were removed from the regulations. The text of the revised regulations is available at: <https://ceq.doe.gov/docs/laws-regulations/nepa-implementing-regulations-desk-reference-2021.pdf>. Consistent with the regulations, the EA does not discuss cumulative impacts separately from other impacts.

EC1010 - Environmental Consequences: Natural Resources

Concern ID: 66178

**CONCERN
STATEMENT:**

A commenter stated that the EA does not provide evidence that plant communities within National Capital Parks - East are susceptible to damage caused by deer.

**Representative
Quote(s):**

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023486

Organization Type: Unaffiliated Individual

Representative Quote: In regard to the forest/vegetation assemblages identified in the DEA, the NPS reports that two (i.e., Fall-line Terrace Gravel Magnolia Bog plant community and Coastal Plain Oak Floodplain Forest plant community) are known to be adversely impacted by deer. For the remainder, the NPS suggests that they are also susceptible to damage attributable to deer but it provides no evidence to substantiate such claims. The NPS must, using the best available scientific evidence, prove the susceptibility of all such forest/vegetation assemblages to damage caused by deer. Absent such a comprehensive analysis, the DEA violates NEPA.

Response:

Many of the dominant canopy and understory species of the forest ecosystems within National Capital Parks - East are palatable to deer. Browsing impacts species palatable or preferred by deer by reducing individual plant reproduction and survival, which changes the genetics of plant populations. Overtime there may be a reduction in species diversity and an alteration of the forest structure—density, species composition, and condition. Mortality may be directly from deer overbrowsing or due to impacts to overall plant reproduction and survival, reducing seed production and distribution. Continuous overbrowsing of preferred plants could result in the loss of individual species from the community. While fenced and unfenced paired plot monitoring has not been conducted in National Capital Parks - East, NPS has used this method to assess impacts to vegetation in other parks in the NCA. In these parks, the impacts of deer could be distinguished from impacts of other herbivores and other factors. The impacts to vegetation/habitat within unfenced plots were directly attributable to deer. Other environmental factors did not vary between fenced and unfenced paired plots.

Concern ID: 66179

**CONCERN
STATEMENT:**

Commenters stated that deer culling does not reduce the long-term population of the deer and that killing deer will trigger a rebound effect that will increase the deer birthrate and population.

**Representative
Quote(s):**

Corr. ID: 74

Organization: Not Specified

Comment ID: 1023488

Organization Type: Unaffiliated Individual

Representative Quote: ...hunting...is immensely cruel. Despite what hunters claim, there's no "instant" death. Deer are found with arrows and bullets hours, days, even weeks after being shot in immense pain but still alive. Reports have shown about half of all deer shot by hunters actually are found and finished off. The other have get away and either die soon after or live for a long time until they are euthanized or saved.

On top of this, many does who are pregnant are shot, suffering greatly as they slowly die with their baby struggling inside of them.

Corr. ID: 93

Organization: Not Specified

Comment ID: 1023489

Organization Type: Unaffiliated Individual

Representative Quote: Scientists have long had consensus that many if not most animals are sentient, conscious and self aware.

"In 2012, a group of neuroscientists signed the Cambridge Declaration on Consciousness, which "unequivocally" asserted that "humans are not unique in possessing the neurological substrates that generate consciousness. Non-human animals, including all mammals and birds, and many other creatures, including octopuses, also possess these neural substrates." "

Link for citation:
https://en.m.wikipedia.org/wiki/Animal_consciousness#Cambridge_Declaration_on_Consciousness

Corr. ID: 95

Organization: Save the Rock Creek Park Deer

Comment ID: 1023491

Organization Type: Conservation/Preservation

Representative Quote: Without lethal interference, deer populations are self-regulating and stable, as Rock Creek Park's was for decades. But when large numbers are suddenly killed

year after year, "the rebound effect" kicks in, causing the remaining deer to produce twins at a younger age due to the enhanced food supply. This increases the birth rate and the population. Deer from neighboring communities also move into areas that open up after deer are killed. By increasing the killing of deer, NCP - E will be creating an overpopulation problem and destabilizing the population of deer.

Instead of reducing the deer population, killing actually increases and destabilizes it. For example, density surveys in the fall of 2016 in Rock Creek Park determined there were 19 deer per square mile in the Park - a goal NPS had set for itself after three years of killing. But instead of moving to non-lethal management as it said it would, NPS continued killing, and a year later in 2017, surveys determined density had nearly tripled to 55 deer per square mile.

Corr. ID: 95

Organization: Save the Rock Creek Park Deer

Comment ID: 1023490

Organization Type: Conservation/Preservation

Representative Quote: Killing deer has only increased the population. This increase will now happen across the DC and MD region if NPS begins killing deer in all of these parks...

NPS refuses to consider non-lethal alternatives even after creating population increases because of the "rebound effect."

Corr. ID: 97

Organization: Not Specified

Comment ID: 1023492

Organization Type: Unaffiliated Individual

Representative Quote: I am writing to request that you cease lethal population control of deer, as it is both cruel and ineffective. It is cruel in that quick kills are rare, and many animals suffer to death over long periods of time, when hunters severely injure them, without killing them. It is ineffective for a variety of reasons. One reason is that even if the number of deer is lowered temporarily, it will quickly bounce back. This is a result of what is known as "compensatory rebound", where more twins and triplets are born. The sudden reduction in population causes more food and resources to be available, thereby increasing the birth rate.

Response:

Under the proposed action, both does and bucks would be removed based on opportunity. There would be a preference for removing does to reduce the population level more efficiently over the long term. Every effort would be made to make lethal deer management conducted in any form as humane as possible (EA page 9). The safety and annual operation plans will include protocols for the humane treatment of animals to prevent unnecessary harm or injury. Regarding the "rebound effect" and the belief that sharpshooting will result in more deer, the relationship between deer density and fertility is well known (Swihart et al. 1998). The reproductive rate of deer may increase in response to a decrease in the overall population density. Future deer removal actions will set targets informed by the annual monitoring,

which would take into consideration population growth and adjust management actions as needed to maintain desired deer density.

Concern ID: 66180

**CONCERN
STATEMENT:**

Commenters questioned how effective deer culling would be along the Baltimore Washington Parkway, Fort Washington, Fort Foote, and other small urban parks as deer can be replaced by deer from surrounding neighborhoods and parks.

**Representative
Quote(s):**

Corr. ID: 50

Organization: Not Specified

Comment ID: 1023494

Organization Type: Unaffiliated Individual

Representative Quote: How effective will deer management be for the Baltimore Washington Parkway? Based on the maps provided the Baltimore Washington Parkway corridor contains very narrow strips of parkland. I find it hard to believe that deer are actually living and breeding exclusively within these narrow parklands. Any deer killed by sharpshooters can easily be replaced by deer that live in the surrounding neighborhoods and parks, including the adjacent Patuxent Wildlife Research Refuge. Similarly PWRR has had hunting within the refuge for years. As well as the sharpshooting program at the Beltsville Agriculture Research Center. Have these programs effectively controlled the deer population?

The same could be said for the other sites listed - many such as Ft Washington and Ft Foote are small urban parks surrounded by communities with high deer populations. Sharpshooting all deer including does and fawns is not only inhumane but will just bring additional deer from the surrounding areas to replace those lost. They can take advantage of fewer competition and produce more offspring.

Response:

White-tailed deer can be a transient species, that seasonally migrate throughout their range. However, migratory individuals within a local population generally maintain the same migration pattern/routes and range each year (DeYoung and Miller 2011). Deer are an edge species that thrive on food and shelter along the "edge" habitat along forest and fragmented landscapes. The linear nature of the Baltimore Washington Parkway and other similar parks provides a large amount of the desired edge habitat that is preferred for deer foraging and shelter.

The NPS recognizes that deer management is not a one-time event. The Plan is intended to guide long-term management of white-tailed deer over the next 20 years to support the protection, preservation, and restoration of native vegetation. Deer management programs administered by NPS, Maryland DNR, Montgomery, Prince George's, and Anne Arundel Counties have documented the successful reduction in deer population densities with lethal deer management programs. For example, Gettysburg National Military Park met their desired deer density target after 11 consecutive years of deer management. Park-wide deer density at Gettysburg was 325 deer per forested square mile when they began culling (Bowersox et al. 2002). Montgomery County has been actively addressing deer

overabundance since 1995. Montgomery County, Maryland has reduced deer densities from 60 to 163 deer per square mile to less than 30 per square mile at four parks after 7 to 9 years of deer management (Montgomery County Department of Parks 2007). Catocin Mountain Park, Monocacy National Battlefield, and Rock Creek Park have shown steady improvements in the number of seedlings per year since the initiation of deer management programs within the parks. At Rock Creek Park, tree seedling numbers have almost tripled since deer management began in 2013 (NPS 2020). Since deer management began at Catocin Mountain Park in 2010, there has been a 13-fold increase in seedlings dominated by white ash (*Fraxinus americana*). White ash, which is highly palatable to deer, made up almost 75% of all the seedlings within survey plots during initial years of deer management (Schmit et al 2020). (EA page 19)

EC1020 - Environmental Consequences: Visitor Experience

Concern ID: 66181

**CONCERN
STATEMENT:**

Commenters expressed that managed hunt programs and sharp shooters negatively impact the park environment and visitor experience. Commenters noted that observing deer is a beneficial part of the park experience and the deer management plan would negatively impact this opportunity.

**Representative
Quote(s):**

Corr. ID: 69

Organization: Not Specified

Comment ID: 1023497

Organization Type: Unaffiliated Individual

Representative Quote: Lastly, killing wildlife conflicts with the Congressional mandate for NPS to conserve and leave unimpaired the wildlife within the parks. Your ongoing deer killing program in Rock Creek Park (8 years and counting) has negatively impacted my ability to enjoy the park. NPS must not be given another carte blanche to kill deer in these additional parks.

Response:

The EA states that "The proposed action may result in temporary disruptions to park visitors, primarily from the closures that would be required to accomplish deer management activities safely. Implementing these closures would impact visitor use and experience while management activities are being conducted. However, these disruptions would be minimal because deer management activities would occur (1) during the late fall and winter months when visitation is lower and (2) at night when the parks are closed." The experience associated with visiting the parks during daytime hours would not be affected by the proposed action. NPS agrees that seeing deer can benefit the visitor experience and may affect some visitors more than others, depending on the reasons for visiting the park. Viable deer populations remain a significant part of park ecosystems. It is acknowledged in the Plan that the ability to see deer may be decreased; however, the Plan does not eliminate deer from the park.

Reducing the deer population in National Capital Parks - East would result in increased forest regeneration and an abundance and diversity of native plants, and would improve habitat conditions within the park, and increase visitors' opportunities to experience natural biodiversity, vegetation, and wildlife.

EC1030 - Environmental Consequences: Human Health and Safety

Concern ID: 66182

***CONCERN
STATEMENT:***

Commenters suggested culling deer would be dangerous in proximity to people and create other risks to people and pets.

***Representative
Quote(s):***

Corr. ID: 65

Organization: Not Specified

Comment ID: 1023498

Organization Type: Unaffiliated
Individual

Representative Quote: An additional concern is that the areas where the killing is slated to occur are close to residential areas. The risk of inadvertently harming people in the area and those who use the parks should be factored into consideration when deciding on an effective, safe and long term approach to managing the deer population in our area.

Corr. ID: 74

Organization: Not Specified

Comment ID: 1023499

Organization Type: Unaffiliated
Individual

Representative Quote: Further studies have shown those who participate in hunting have higher domestic violence tendencies than those who don't. Allowing hunting encourages violence towards humans and other animals.

Hunting also has many accidents. Many hunters are shot by other hunters or their own guns. Children and pets also are victims of being mistaken for the targeted animal.

Hunting is not effective at all. Humans, dogs, and others die. It worsens the population problem and makes future generations sicker, and simply is incredibly cruel.

Response: The park is closed at dark. The proposed action includes safety measures to minimize risk to the safety of the public. Safety and operational plans will be reviewed annually in after-action meetings to continually improve safety. As noted on page 9 and 10 of the EA, experienced sharpshooters with the necessary qualifications, firearms training, and safety training would be the primary method used for lethal removal activities. Public hunting would not be allowed. In areas where use of firearms is not appropriate due to safety or security concerns, the use of archery, or capture and euthanasia, would be considered. Additional safety measures include working away from populated areas and with safety buffers from the park boundary; temporarily closing roads; requiring commuters, including cyclists, to use alternate routes; stationing NPS personnel at closures; enforcing nighttime trail closures; posting signs on closed trails/roads and bulletin boards; coordinating with other law enforcement agencies, such as working with US Park Police and the Maryland-National Capital Park and Planning Commission (M-NCPPC) Park Police; using elevated positions to provide downward angled shots; always shooting toward the interior of the park; and using ammunition with a shorter travel distance. Non-lead ammunition would be used to avoid contamination of the meat and potential intake by scavenging wildlife. Infrared heat scanners and night vision goggles would be used to identify deer. Noise suppression devices would be used to reduce disturbance to the public.

Concern ID: 66183

CONCERN STATEMENT: Commenters suggested that the analysis of ticks is insufficient and that an assessment of the role deer density plays in tick-borne diseases is needed. One commenter stated that tick populations would not be affected by reduction in the deer population.

Representative Quote(s):

Corr. ID: 48

Organization: Not Specified

Comment ID: 1023500

Organization Type: Unaffiliated Individual

Representative Quote: While the specific issue being addressed surrounds local plant-life, I believe it would also be effective to study the impact of increased deer population on tick populations, and subsequently tick-borne illnesses such as Lyme Disease.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023501

Organization Type: Unaffiliated Individual

Representative Quote: The NPS claims that deer adversely impact human health and safety as hosts for ticks and due to deer-vehicle collisions. While the NPS admits that other wildlife species harbor ticks, its analysis of the role deer in contributing to

the transmission of tick related illness is much more complex than reported by the NPS and it entirely fails to even begin to capture that complexity in its summary. While the NPS claims that the public and park staff have reported high tick abundance in Greenbelt and Piscataway Parks, it provides no data on tick densities or on cases of tick diseases in humans visiting or living near those parks, or any discussion of the efforts it undertakes to educate park visitors and neighbors about ticks and how to protect themselves from tick borne diseases. Instead, it expects the public to believe its claims absent any credible proof.

Corr. ID: 95

Organization: Save the Rock Creek Park
Deer

Comment ID: 1023502

Organization Type:
Conservation/Preservation

Representative Quote: The tick population is actually worse if you kill the deer. The deer help reduce the tick population by ingesting them. The ticks remain on mice and birds and are transmitted that way, not through the deer. To suggest otherwise is misrepresentation and lying to the public.

Response:

The purpose of the proposed action is to manage white-tailed deer populations within National Capital Parks - East to promote natural regeneration of forest vegetation and the restoration of cultural landscapes that have been detrimentally affected by deer overbrowsing. Deer management is not proposed to reduce the number of ticks or reduce tick-borne illnesses. Ticks and tick-borne illnesses were assessed in the EA because deer are hosts to ticks, and deer management would reduce the presence of these hosts. Reports of ticks within parks including Greenbelt and Piscataway Parks is based on reporting by Park personnel. National Capital Parks - East has not studied the prevalence of ticks or tick-borne illness in the park unit. The EA acknowledges there are other mammals such as white-footed mice, that also serve as hosts for ticks. The possibility that visitors and employees may still encounter ticks and acquire Lyme disease or other tick-borne diseases would not be eliminated (EA page 31).

Concern ID: 66185

CONCERN STATEMENT A commenter suggested that the analysis of deer-vehicle collisions is insufficient and that the EA does not discuss what actions NPS has employed to reduce these accidents.

Representative Quote(s):

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023503

Organization Type: Unaffiliated Individual

Representative Quote: As to deer-vehicle collisions, there is no question that they occur, but the NPS, again, fails to provide any data on such accidents in or adjacent to NCPE parks, the severity of such collisions, whether any humans were harmed or died as a result, and the monetary damages accrued. Nor does the NPS disclose what, if any actions it has employed, to reduce such accidents including by installing permanent/temporary warning signs, establish slower speed zone in known collision hotspots, or by educating drivers as to the steps they can take to reduce the likelihood of such accidents.

Response:

The purpose of the proposed action is to manage white-tailed deer populations within National Capital Parks - East to promote natural regeneration of forest vegetation and the restoration of cultural landscapes that have been detrimentally affected by deer overbrowsing. Deer management is not proposed to reduce deer-vehicle collisions. Deer-vehicle collisions were discussed in the EA as part of the human health and safety analysis. The frequency of deer-vehicle collisions is based on reporting by Park personnel. As noted in the EA, NPS does not collect data on vehicle-deer collisions in National Capital Parks - East (EA page 30).

Concern ID: 66186

CONCERN STATEMENT: A commenter expressed concern that culling deer and donating meat could lead to the spread of disease.

Representative Quote(s):

Corr. ID: 74

Organization: Not Specified

Comment ID: 1023504

Organization Type: Unaffiliated Individual

Representative Quote: Yes another issue is transmittable diseases from the deer. While the presence of deer may not transmit a disease, consumption of their flesh does. A growing number of deer are being found carrying COVID-19 in a recent

study. Allowing people to hunt and eat these animals will only worsen the current pandemic, or allow a new disease to jump into humans starting yet ANOTHER pandemic.

Response: NPS would follow current guidance from the NPS Office of Public Health and the Washington Office - Biological Resources Division, Centers for Disease Control and Prevention, and state and local requirements for handling of animals and meat and donation of meat. Prior to donation, the park will follow NPS policy and regulatory agency guidance when testing for diseases such as SARS-CoV-2 (e.g., COVID-19) and CWD.

ED1000 - Editorial: Request for clarification and data

Concern ID: 66187

CONCERN STATEMENT: A commenter stated they were unclear on the use of the terms "overabundance" and "overpopulation" in the EA.

Representative Quote(s):

Corr. ID: 23

Organization: Not Specified

Comment ID: 1023505

Organization Type: Unaffiliated Individual

Representative Quote: I am in support of the NO ACTION plan within the Deer management plan. I am not in support of lethal killing of deer. I am also unclear on the difference between overabundance and overpopulation. Does this plan use they synonymously or is there a different threshold for overabundance. Clarity would help understand the plan better.

Response: The terms "overabundance" and "overpopulation" are used synonymously in the EA as they are in the scientific literature.

Concern ID: 66188

**CONCERN
STATEMENT:**

Commenters requested that data sets from previous case studies produced by NPS be made available. In addition, NPS should demonstrate how this evidence is relevant to conditions that existing in the National Parks-East units.

**Representative
Quote(s):**

Corr. ID: 96

Organization: The Humane Society of the
United States

Comment ID: 1023506

Organization Type:
Conservation/Preservation

Representative Quote: " What type of data collection and analysis has NPS produced related to the Rock Creek Park case study and Catoctin Mountain Park case study? Or any of the park units where management actions are taking place including Antietam National Battlefield, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Monocacy National Battlefield or Manassas National Battlefield Park. Where can these data sets be found?

" How can the public know that lethal management and removal of deer from other parks are relevant to the conditions that exist in the National Parks-East units? Any data, study, or other evidence used to claim that deer are causing one or more impacts any of these park units should be from studies conducted within those units.

Response:

Monitoring data for individual parks is available through the NPS DataStore (<https://irma.nps.gov/DataStore/>). Among the many studies available are yearly Resource Briefs on Forest Regeneration for the parks in the National Capital Area. These parks, along with National Capital Parks - East, are all located within the Maryland/DC area and have similar vegetation communities and habitat and thus provide relevant information for use in developing alternatives and assessing impacts under the Plan.

Concern ID: 66189

**CONCERN
STATEMENT:**

Commenters noted that references used in the preparation of the EA are not available online for public review.

**Representative
Quote(s):**

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023507

Organization Type: Unaffiliated Individual

Representative Quote: The literature cited in the DEA reveals the inadequacy of the document and lack of transparency by the NPS. Of the approximately 40 documents cited in DEA, only four were published in the peer-reviewed literature and the NPS provided a URL to access only five of the document. The Bates (2018) deer report, which the NPS extensively cites to support many of its claims, could not be found online preventing a review of the report, its methodologies, and conclusions. The public must be provided access to the evidence that the NPS relies on to substantiate its claims. In this case, if the documents are available online, the NPS should have created a website where the public could access the document. Such secrecy in a NEPA document is not consistent with the intent of NEPA.

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023508

Organization Type:
Conservation/Preservation

Representative Quote: An additional concern is regarding the reference material on which a number of assertions are predicated including overabundance, seedling browse, and importantly, population estimates of deer in the national park region. The 2018 National Capital Region Deer Report to DOEE by Bates, Scott does not seem to be readily available for review on DOEE or NPS websites. During the scoping phase it was stated that this and other data and information from population reduction and assessments in other park units would be shared and made available prior to the EA. We would also request the inclusion and consideration of any peer-review publics, reports, summary of monitoring having identified the need for action and any other efforts, or other data and documentation that would help clarify the justification, objectives and status of the proposed deer management program.

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023509

Organization Type:
Conservation/Preservation

Representative Quote: What is the plan to provide data or make it accessible to the public from case studies along with any related analysis used to support the proposed deer management approach (and ongoing management) in these park units and when and in what form will it be available to the public?

Response:

Monitoring data for individual parks is available through the NPS DataStore (<https://irma.nps.gov/DataStore/>). Among the many studies available are yearly Resource Briefs on Forest Regeneration for the parks in the National Capital Area.

PN1000 - Purpose And Need: Planning Process And Policy

Concern ID: 66135

**CONCERN
STATEMENT:**

Commenters suggested that the NPS did not disclose the legal authority it has to cull the deer population. Commenters stated that the NPS Organic Act provides for lethal control of animals only in certain situations and that deer culling conflicts with NPS' Congressional mandate to conserve and leave unimpaired wildlife in the parks. Furthermore, a commenter stated that NPS does not have authority to undertake the proposed action without providing evidence that deer have caused detrimental impact to the public use of the park.

**Representative
Quote(s):**

Corr. ID: 57

Organization: City Wildlife, Inc.

Comment ID: 1023311

Organization Type:
Conservation/Preservation

Representative Quote: The National Park Service is mandated to protect and preserve the parks and the natural systems and cultural resources that occur in them and to allow for natural processes to regulate their biotic communities to the extent possible. "To the extent possible" is generally taken to mean except where human influences make "natural" regulation unlikely or perhaps even impossible. NPS is different from other resource management agencies in this respect and arguably cannot afford a management program that is composed of actions taken by individual parks (footnote 2). We raised this concern in our scoping letter to you, hoping that it

would generate a thoughtful response if not defense of the standard for management being adopted. It remains to be addressed, however, along with (footnote 3) the policy implications it generates...³ See also EA, Pg. 22.

Corr. ID: 71

Organization: Not Specified

Comment ID: 1023312

Organization Type: Unaffiliated
Individual

Representative Quote: Lastly, killing wildlife conflicts with the Congressional mandate for NPS to conserve and leave unimpaired the wildlife within the parks.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023315

Organization Type: Unaffiliated
Individual

Representative Quote: The NPS cannot engage in the slaughter of wildlife in any park based merely on the alleged adverse impacts of wildlife, in this case, deer on forest regeneration, vegetation characteristics (i.e., productivity, composition, abundance, rigor, and health), other wildlife species, and cultural resources without statutory and regulatory authority to do so. There are only two sections of the NPS Organic Act that the NPS could use to justify the lethal control of potentially hundreds of white-tailed deer on NCPE parks. The first, found at 54 USC §100101, states that "shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." This provision, however, is not applicable in this context because it is applicable to the management of public uses of the parks to prevent their impairment. The second, found at 54 USC §100752, states that "[t]he Secretary may provide for the destruction of such animals and plant life as may be detrimental to the use of any System unit." This provision may be relevant to the situation on the NCPE parks if the NPS has definitive evidence that deer has caused a detrimental impact to public use of the parks (the word "use" in the statute must apply to public use as it is the only logical interpretation of that term in the context that it is used). If Congress hadn't intended for such evidence to be a prerequisite for engaging in the lethal control of a native ungulate then it surely would not have included "detrimental to the use" in the text of the statute (i.e., it could have allowed the destruction of park animals that are detrimental to the system unit).

Not only has the NPS failed to articulate the legal basis for its proposed lethal deer control program in the DEA but it has neglected to provide even any credible evidence, in the form of emailed or written complaints to the NPS or professionally

conducted surveys of NCPE visitors attitudes about the park, its deer, and other wildlife to suggest that deer are detrimental to the use of the NCPE parks. Indeed, the only evidence contained in the DEA even remotely suggesting that deer are detrimental to the public use of the NCPE parks is concern expressed by visitors to Greenbelt Park of high tick densities. Utilizing such evidence to justify the lethal removal off native wildlife would not set a precedent since this is precisely what Grand Canyon National Park did several years ago when planning to remove individual deer that were becoming a danger to humans after becoming habituated to human food handouts. Absent the presentation of evidence that deer have caused a detrimental impact to the public's use of NCPE parks, the NPS does not have the legal authority to implement its preferred alternative. If such evidence does exist but the NPS simply neglected to incorporate it into the DEA, it can't simply ask for a mulligan. Instead, it has to prepare a new DEA (or preferably a DEIS) that incorporates that evidence and provides a fresh, objective examination of the environmental impacts of the proposed action.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023316

Organization Type: Unaffiliated
Individual

Representative Quote: Considering that the NPS must demonstrate that deer are detrimental to the public use of the NCPE parks in order to have the legal authority to implement its planned deer slaughter, the NPS should have disclosed visitor use data for each of the NCPE parks as well as any surveys done (by the NPS or third parties) to assess visitor use and enjoyment of the parks. Other parks have conducted such surveys to obtain a profile of park visitors, what parks attractions were visited, the money spend for the visit, and to determine what they liked (and didn't like) from their visit. If such surveys/data exist for NCPE parks, the NPS was obligated to disclose it and analyze it particularly in regard to visitor perceptions of deer in the parks. If such data does not exist, the NPS should collect it to improve park management.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023314

Organization Type: Unaffiliated
Individual

Representative Quote: What Congress intended in promulgating the NPS Organic Act, is that management of national parks should embrace the concept of natural regulation where nature, not man, determines the abundance, distribution, health, and other characteristics of wildlife within the parks and that natural factors dictate the ecology and ecological functions within the parks. In other words, the management of national parks was intended to be different than the more intensive and manipulative management of lands and wildlife on other federal lands and by other federal

agencies (e.g., the US Forest Service, the US Fish and Wildlife Service, the Bureau of Land Management, the Department of Defense). Unfortunately, as has occurred in the past, the NPS has significantly lost its way in recent decades electing to promote the manipulation of nature through human actions to accomplish some desired cultural landscape or to achieve a natural landscape that is maintained in a condition that the NPS deems to be appropriate, acceptable, and desirable.

Response:

The NPS has broad authority to manage wildlife and other natural resources within the boundaries of units of the national park system. In addition to the general mandate to conserve park resources and prevent impairment, the NPS Organic Act also expressly authorizes the Secretary of the Interior to "provide in his discretion for the destruction of such animals and of such plant life as may be detrimental to the use of any" NPS unit (54 USC 100752). This project is a straightforward exercise of that discretion. The courts have consistently upheld NPS authority to conduct actions of this sort, including at Rocky Mountain National Park, Gettysburg National Military Park, Valley Forge National Historical Park, and Rock Creek Park. NPS Management Policies allow for the management of both native and non-native species (NPS Management Policies 2006, section 4.4.2.1, 4.4.4.2) to prevent them from interfering broadly with natural habitats, natural abundances, and natural distributions of native species and natural processes.

National Capital Parks - East provides valuable habitat for vegetation and wildlife and contributes to the region's biodiversity. Viable wildlife populations and wildlife habitat are necessary to fulfill the purposes for which the park was established and are key to the natural integrity of the park. Implementation of the preferred alternative would not impair wildlife or wildlife habitat because of the low magnitude of adverse effects from management actions and the benefits that would result from reduced deer browsing pressure. The actions in the preferred alternative would have mostly beneficial impacts because quickly reducing deer browsing pressure and maintaining a smaller deer population would enhance forest regeneration and therefore enhance forest habitat by allowing vegetation to recover and improving foraging habitat.

Concern ID: 66136

**CONCERN
STATEMENT:**

Commenters stated that the NPS must provide foundation and management planning documents for all the parks that are proposed for deer management and that current management plans and the National Capital Parks - East Foundation document do not reflect a need for deer management. A commenter stated that the NEPA process should not be completed until documents required by NPS Management Policies are in place for each park proposed for deer management. These documents include a foundation statement, general management plan, program management plan, and strategic plan. The commenter said that all of these planning documents should provide the legal foundation for lethal deer management.

**Representative
Quote(s):**

Corr. ID: 46

Organization: Not Specified

Comment ID: 1023317

Organization Type: Unaffiliated
Individual

Representative Quote: While I agree with your preferred plan, I was disappointed that there was no mention of the management framework utilized to manage such large areas. I think the public would benefit greatly in knowing that information.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023318

Organization Type: Unaffiliated
Individual

Representative Quote: The NPS cannot engage in the lethal slaughter of deer on NCPE parks until it has completed the suite of hierarchical planning documents as called for in the NPS management policies: The NPS relies on a hierarchical planning structure to ensure that management decisions are authorized, appropriate for each park in regards to the park's purpose, and to support decisions made. Like a cinder block wall, each level of the NPS planning structure builds upon the preceding level. Such policies are "guided by and consistent with the Constitution, public laws, Executive proclamations and orders, and regulations and directives from higher authorities" (see <https://www.nps.gov/policy/DOrders/thingstoknow.htm>) and "park superintendents will be held accountable for their and their staff's, adherence to Service-wide policy." NPS Management Policies at 4. General management plans and five-year strategic plans are required by 54 USC §100502 and §100503, respectively. NPS management policies identify seven different planning levels for each parks; the foundation statement, general management plan, program management plans, strategic plans, implementation plans, annual performance plans, and annual performance reports. NPS Management Policies at 22/23. The current DEA for deer

management is considered an implementation plan and, therefore, it must be preceded by a foundation statement, general management plan, program management plans, and strategic plans for the NCPE parks. To be clear, it is not simply a case where the planning documents must be published and in place before an implementation plan can be developed, but they suite of planning documents must provide the authority for the implementation plan - in this case for the slaughter of native deer. In the case of NCPE, in the event that it has authority over the other parks on which deer management is proposed, perhaps those other parks can be included in the required planning documents, including the Foundation Document and General Management Plan, for NCPE.

A search of each of the NCPE parks named in the DEA on the NPS planning website (<https://parkplanning.nps.gov/>) and its separate "management plans" website (<https://parkplanning.nps.gov/ManagementPlans.cfm>), as well as a separate Google search of each park revealed only two of the planning documents required by the NPS management policies. The first was a Foundation Document for NCPE (see Foundation Document Overview, National Capital Parks-East, District of Columbia / Maryland) and the second was a General Management Plan for Anacostia Park Management Plan Environmental Assessment. A review of the Foundation Document for NCPE reveals that it covers the following park units:

- Piscataway Park, including the Fort Washington Marina and Marshall Hall
 - Oxon Cove Park, including Oxon Hill Farm and Oxon Run Parkway
 - Harmony Hall
 - Mary McLeod Bethune Council House National Historic Site
 - Greenbelt Park
 - Frederick Douglass National Historic Site
 - Fort Washington Park
 - Civil War Defenses of Washington
 - Baltimore-Washington Parkway
 - Carter G. Woodson Home National Historic Site
 - Anacostia Park and Kenilworth Park and Aquatic Gardens
 - Capitol Hill Parks, including the various U.S. Reservations east of the Capitol and within the L'Enfant Plan for the federal city
 - Suitland Parkway and various U.S. Reservations
- management policies.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023319

Organization Type: Unaffiliated
Individual

Representative Quote: While the Foundation Document is not dated, based on information found online, I believe it was published in October 1982 making it nearly 40 years old. Its content says virtually nothing about white-tailed deer nor does it indicate that there are any concerns or challenges with management wildlife within the parks. The only reference to white-tailed deer in the entire document is in the description of Greenbelt Park where it is said that:

Its high-quality forests serve as a home to a variety of wildlife, including coyotes, neotropical migrant birds, white-tailed deer, red foxes, woodchucks, opossums, skunks, beavers, chipmunks, and flying squirrels. The park also hosts nesting neotropical forest migrants. Fauna in the park includes mixed pine and deciduous forests, an array of wildflowers, and understory ferns.

This language is hardly reflective of a park that is being decimated by deer. Perhaps this is due to the age of the Foundation Document which cannot be used as an excuse to proceed with the proposed slaughter but, rather, should prompt the NPS to develop a new, up-to-date foundation document.

A review of the Anacostia Park Management Plan finds that "deer" is only mentioned a single time in the nearly 200-page document published in 2017. The single reference to deer merely notes that they are present in the park. That reference is included in a section on "wildlife and wildlife resources" that was identified as a planning issue and concern that was dismissed from further analysis. In another section of the document examining "past, present, and reasonably foreseeable actions," there is no reference to any planned lethal deer control despite the fact that this General Management Plan was only published four years ago. Indeed, there is very little, if anything contained in the plan to suggest that deer in Anacostia Park were of any concern or consequence to forest regeneration, vegetation characteristics, cultural resources, or the public use of the park. Of course, even if such language existed, this Management Plan is limited to Anacostia Park.

At best, the current DEA may be a product of inadequate planning by the NPS and a failure to follow its own management policies since, at a minimum, the NPS must revise and update the NCPE Foundation Document and publish an NCPE General Management Plan, program management plan, and strategic plans before it can even contemplate a deer management plan if it wants to comply with its own management policies. Notably, each of these documents must be prepared in order and must be subject to public review. Some of these documents, including any General Management Plan, must also be subject to NEPA review. Furthermore, assuming the NPS engages in the planning processes, since it has prematurely published the DEA, the current DEA process must be terminated. Then, after the other required planning documents are in place, the NPS must prepare a new DEA or, preferably, a DEIS providing an objective, comprehensive, and fresh examination of the environmental impacts associated with the proposed deer management plan in each of the target parks. Simply put, should the NPS instead decide to proceed with the current planning effort it will be blatantly violating its own management policies.

Response:

This comment is beyond the scope of this Plan and this EA. The NPS park planning program uses a flexible planning framework to meet park planning needs and fulfill legal and policy requirements. Under Director's Order #2, a park's planning portfolio—the totality of planning documents in use at a given park—fulfills a park's various planning needs. For deer management, this plan/EA, along with the National Capital Parks - East Resource Stewardship Strategy Summary (NPS 2021), will serve as the planning guidance documents for management of deer within National Capital

Parks - East. This plan/EA elaborates upon and further implements the Resource Stewardship Strategy, and addresses the information needs that were identified there.

Concern ID: 66137

**CONCERN
STATEMENT:**

A commenter stated that an EIS is required to provide substantive analysis of non-lethal deer management. Furthermore, a commenter states that the proposed action meets or exceeds several significance factors outlined in NEPA to determine if an EIS is warranted.

**Representative
Quote(s):**

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023321

Organization Type: Unaffiliated
Individual

Representative Quote: The NPS must prepare an EIS:

The regulations implementing NEPA contain ten significance factors that agencies are required to consider in determining if an action requires analysis in the EIS. In this case, the proposed action satisfies XX of the ten factors; satisfying even one warrants the preparation of the EIS. In this case, the action meets or exceeds the following significance factors:

- (1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.
- (3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.
- (4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.
- (5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.
- (6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.
- (7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.
- (8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

For the reasons articulated in this letter, the NPS has no choice but to terminate the DEA and current planning process. The NPS has failed to identify the legal authority under which it claims it can conduct a wholesale slaughter of deer within the NCPE parks and it has ignored its own management policies in failing to engage in the hierarchical planning process to provide the requisite foundation for the proposed

lethal deer management plan. Furthermore, it has grossly failed to comply with NEPA as the DEA does not contain anywhere near the level of analysis required in such a document. Fundamentally, and EIS is not only clearly required for this action but it will lead to a more informed decision if the analysis is comprehensive and unbiased.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023320

Organization Type: Unaffiliated
Individual

Representative Quote: The DEA is so grossly inadequate and superficial that it was clearly prepared to check a legal box in order to expedite planning for the wholesale slaughter of deer on NCPE lands instead of providing the "hard look" at the environmental impacts of the action as required by NEPA...since many of the deficiencies in the DEA are a product of what the NPS failed to include in the DEA, this constitutes a procedural inadequacy of the document...if the NPS intends to comply with the law in this case, it must terminate the DEA process, ensure that the required foundation and management planning documents exist and/or are up-to-date for NCPE and/or all of the individual park units on which the NPS is seeking to kill deer, and then engage in the development of a new, comprehensive deer management plan and EIS. Only through the preparation of an EIS can the NPS provide this proposed action with the level of analysis that it requires and that the public, including those who enjoy using and observing deer in NCPE, deserves.

Response:

NPS has studied the impacts of deer management through research and ongoing deer management programs at other park units including Catoctin Mountain Park (NPS 2008), Rock Creek Park (NPS 2011b), Antietam and Monocacy National Battlefields and Manassas National Battlefield Park (NPS 2014b), and the Chesapeake and Ohio Canal and Harpers Ferry National Historical Parks (NPS 2017). Based on this experience and the analysis in this EA, NPS does not believe that there is a potential for significant impacts from implementation of the Plan. Therefore, in accordance with NEPA and with Council on Environmental Quality (CEQ) regulations and NPS guidance, NPS has prepared a Finding of No Significant Impact.

PN1010 - Purpose And Need: Proposed Action

Concern ID: 66138

***CONCERN
STATEMENT:***

Commenters requested that the goals of deer management be quantified to measure progress. One commenter questioned how NPS would measure, evaluate, publicly report progress, and reconsider future actions including the use of non-lethal deer management methods. A commenter also suggested that the NPS reevaluate the carrying capacity and the threshold to allow regeneration and an adaptable management plan.

***Representative
Quote(s):***

Corr. ID: 46

Organization: Not Specified

Comment ID: 1023325

Organization Type: Unaffiliated Individual

Representative Quote: Secondly, there was no mention in the EA of any future efforts to determine the parks' carrying capacities for deer or any plans to define standards and indicators to deer impacts. This information is critical to an adaptable management plan that aims to be efficient and effective at mitigating impacts.

Corr. ID: 46

Organization: Not Specified

Comment ID: 1023322

Organization Type: Unaffiliated Individual

Representative Quote: are sharpshooters gathering data for all lethal removal efforts at the parks?

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023323

Organization Type:
Conservation/Preservation

Representative Quote: " What will the target for satisfying the parks management objective be in each park or unit? Will it be a certain deer density, a certain level of vegetative recovery (and or a certain species mix) or something else?
" How often will the objective population target be assessed and evaluated for each park unit? And how and when will it be established? For instance, will there be population estimates done each year in each park unit? What method will be used and were will this information be published or posted?
" Will or has the park been engaged in any research activities to evaluate the

population reduction effort in any of the parks cited in the EA as evidence for deer population reduction via lethal control? And if so, have there been publications in peer-review journals or other places that you can direct the public to so that they can better understand how population reduction methods are implemented and evaluated by the NPS?

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023324

Organization Type:
Conservation/Preservation

Representative Quote: Further, the plan provides no interval for evaluation, assessment or reconsideration based on goal or goals achieved that might include population reduction milestones, seedling regeneration, or the disclosure or revelation of additional non-lethal ways to reduce stressor impacts to seedling regrowth.

Response:

As noted in the EA (page 20), although the biological carrying capacity for deer populations changes with the environmental setting, research by the US Forest Service indicates that deer densities above 20 deer per square mile (or approximately 8 per square kilometer) inhibit forest regeneration (Jones et al. 1993), and that deer densities of less than 20 per square mile (8 per square kilometer) are needed to allow for sufficient forest regeneration (Horsley et al. 2003).

In adaptive management, the ecological process of tree regeneration response, that is, the number of tree seedlings, informs the park's deer density target and is an indicator or measure toward achieving park objectives. Under the proposed action, the number of deer to be removed annually would be determined based on recent population surveys and the park's desired deer density of 15 to 20 deer per square mile, as well as past and current experience of other deer management programs, technical feasibility, and forest regeneration during Plan implementation (EA page 9). Success of the Plan will be measured based on achieving the target deer density and when 67% of vegetation plots achieve a stocking index of 151 (i.e., the forest regeneration goal), above which a plot is adequately stocked at high densities of white-tailed deer (EA page 18).

The Plan includes the continuation of current management actions including monitoring to document deer population densities and forest seedling regeneration and conduct opportunistic surveillance of the CWD within the deer population (EA page 8). All of the monitoring makes the park responsive to current conditions and able to reduce uncertainties during deer management. The park will use the adaptive management process as required by the Department of the Interior in natural resource management plans to modify actions and adjust the deer management program.

NPS will release an annual press release that documents the total amount of venison donated to food shelters. The total number of deer taken are reported to the Maryland Department of Natural Resources (MD DNR) and District Department of Energy and

Environment (DOEE). Every year, the NCRN I&M program releases a resource brief that shows the status and trends of seedling regeneration, including stocking index in the parks. NCRN I&M also occasionally produces reports on status and/or trends in the vegetation in parks. These documents are publicly available and can be found on the NCRN I&M website: <https://www.nps.gov/im/ncrn/index.htm>.

PN1020 - Purpose And Need: Need for the Proposed Action

Concern ID: 66141

***CONCERN
STATEMENT:***

Commenters stated that the need for the project is speculative and should be backed up with science, and that NPS has not provided sufficient information to demonstrate that the overpopulation of deer has negatively affected plant and animal species, cultural resources, and human health and safety. They further stated that additional research is needed to determine the appropriate number of deer to be removed and to study the long-term effects of deer on vegetation.

***Representative
Quote(s):***

Corr. ID: 57

Organization: City Wildlife, Inc.

Comment ID: 1023326

Organization Type:
Conservation/Preservation

Representative Quote: That said, we find the current proposal to expand lethal controls throughout NACE lacks a solid approach in science and has been advanced without sufficient response to concerns we raised during public input and review. The fact that this document is put forward as a combined management plan / environmental assessment suggests that NPS has already decided to move forward with a cull, despite scoping comments made by City Wildlife and others about issues that have not been addressed in this EA. This is inconsistent with the spirit if not the actual mandate for review under the National Environmental Policy Act (NEPA). For this and other reasons enumerated below, we feel a more thorough NEPA review is required.

Corr. ID: 57

Organization: City Wildlife, Inc.

Comment ID: 1023327

Organization Type:
Conservation/Preservation

Representative Quote: The EA argues a need for action because an overabundance of deer is "degrading vegetation and the habitats of other native wildlife" (footnote 1) throughout NACE. What the deer -plant relationships should look like (i.e., a 'natural' state) is a matter of speculation and needs to be backed up by science. The proposal to reduce deer

populations to the level established in field research on commercial forest restocking, for example, seems arbitrary and should be justified.

Corr. ID: 57

Organization: City Wildlife, Inc.

Comment ID: 1023328

Organization Type: Unaffiliated Individual

Representative Quote: A critical question NPS must answer is: how many deer are appropriate? (footnote 5). There is no way this question will be answered without undertaking an approach that employs different types of experimental design (footnote 6). There is ample documentation in the scientific literature that deer are having negative impacts on the vegetative communities in many parts of the eastern and central states, yet experimental measures of the extent and duration of impact events remain scarce (footnote 7), even at NPS. We raised this in our scoping comments and are disappointed to find that the issue has not been addressed in the EA, even when such data should be or could have been available from NPS's long history with deer in Rock Creek Park.

5 Porter, W. F. (1997). Ignorance, arrogance, and the process of managing overabundant deer. *Wildlife Society Bulletin*, 25(2), 408-412.

6 Treves, A., et al. (2019). Predator control needs a standard of unbiased randomized experiments with cross-over design. *Frontiers in Ecology and Evolution* 7: 462-476.

7 Russell, F. L., Zippin, D. B., & Fowler, N. L. (2001). Effects of white-tailed deer (*Odocoileus virginianus*) on plants, plant populations and communities: a review. *The American Midland Naturalist*, 146(1), 1-26.

Corr. ID: 95

Organization: Save the Rock Creek Park Deer

Comment ID: 1023329

Organization Type:
Conservation/Preservation

Representative Quote: There is no proof deer are "degrading vegetation and the habitats of other native wildlife." Where is the proof that deer "overbrowsing" is causing "unsustainable degradation of the parks' forests and natural resources"?...The National Park Service has not established a need to kill deer in any park in DC or MD. NPS has offered no scientific evidence deer are killing seedlings in any parks.

Corr. ID: 96

Organization: The Humane Society of the United States

Comment ID: 1023330

Organization Type:
Conservation/Preservation

Representative Quote: We urge that a more comprehensive and robust accounting for the factors that affect seedling regeneration be conducted, and that assumption that deer are overabundant in the whole park region also be supported by data and analysis that is accessible and available to all stakeholders. In the plan, only a binary view and plant-browse relationship is presented, and it excludes the impact of habitat fragmentation, changing climate, anthropogenic factors as well as impacts from other species that browse. We urge that at a minimum, the broad assumption that deer are the primary factor impacting seedling regeneration as well as the only factor that can be managed or mitigated be supported. These broad assumptions are made in the absence of analyses of these varied range of park resources that consist of natural areas, trails both marked and unmarked, recreation areas, cultural landscapes, historic homes, parkways, farms, archaeological sites, historic forts, environmental clean-up sites and scenic easements.

Response:

In 2002, the National Capital Area parks initiated a deer monitoring program to collect data on deer densities, including in National Capital Parks - East (Greenbelt, Piscataway, Ft. Washington units) and have continued to monitor through to the present. Additionally, since 2019, the park also has conducted deer monitoring in Washington, DC parks in conjunction with DOE. As documented in the EA, research shows that deer densities of less than 20 per square mile (8 per square kilometer) are needed to allow for sufficient forest regeneration, and deer densities greater than 20 per square mile result in a decrease in the seedlings of many tree species (Horsley et al. 2003) (EA page 9). Deer densities in National Capital Parks - East have consistently been above the target threshold of 15 to 20 deer per square mile (EA pages 20 and 21). While NPS acknowledges that there are other factors that affect seedling regeneration including weather, disease, and other natural phenomena, the effects of the overabundant deer on forests are well documented. No other herbivore has such an impact on the forest ecosystems. Deer have been shown to reduce the diversity, density, and average height of seedlings (Tilghman 1989; Frelich and Lorimer 1985; McCormick et al. 1993; and Marquis 1981, Tilghman 1989, McCormick et al. 1993). While monitoring fenced and unfenced paired plots has not been conducted in National Capital Parks - East, NPS has used this method to assess impacts to vegetation in other parks in the NCA for over 15 years in Washington, DC, and Maryland parks. In these parks, the impacts of deer could be distinguished from impacts of other factors and impacts to vegetation/habitat in unfenced plots were directly attributable to deer, as other environmental factors that can and do influence vegetation/habitat did not vary between fenced and unfenced paired plots. Long-term forest monitoring by the NPS National Capital Region Network, Inventory & Monitoring program (NCRN I&M) began in 2006 prior to any deer management, and the program has continually shown that there is inadequate forest regeneration in the National Capital Parks - East, where only 6.4% of plots have adequate stocking indexes (EA page 18). The NCRN I&M has documented beneficial changes in forest regeneration in parks where deer management has been implemented including steady

improvements at Catoctin, Monocacy, and Rock Creek. At Rock Creek Park, tree seedling numbers have almost tripled since deer management began in 2013, and at Catoctin Mountain Park, tree seedling numbers have increased 13-fold since deer management began in 2009 (NPS 2020).

Concern ID: 66142

**CONCERN
STATEMENT:**

Commenters questioned the need to protect cultural landscapes from deer damage and a commenter requested that NPS should make cultural resource surveys available to the public.

**Representative
Quote(s):**

Corr. ID: 57

Organization: City Wildlife, Inc.

Comment ID: 1023331

Organization Type:
Conservation/Preservation

Representative Quote: The EA also suggests a need to reduce deer numbers to preserve cultural landscapes, basing this on assertions such as that deer create trails can turn into social trails, and that the reduction of deer populations "...may reduce ongoing damage to earthworks and circulation in general throughout the cultural landscapes within NACE."(footnote 8). It is unclear what this means in the context of these parks and is not backed up by details for each park.
8 EA. Pg. 27.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023332

Organization Type: Unaffiliated Individual

Representative Quote: The NPS identifies the presence of a number of cultural resources/landscapes in each of the NCPE parks based on cultural resources surveys. The NPS appears convince that it has a legal mandate to preserve such cultural resources/landscapes to reflect a specific time period or appearance when, in fact, no such mandate exists. While the NPS may prefer to protect certain "snapshots in time," this is a difficult undertaking given nature's desire for succession. Indeed, attempting to maintain such landscapes, features, or appearances can often result in greater environmental impacts than permitting natural succession to proceed. Indeed, there are other ways to tell the story of historically or culturally important lands and landscapes including through film, photographs, public displays, educational curricula, and through the information/stories communicated by NPS naturalists to park visitors. The NPS should have made the cultural resource surveys available to the public and provided a far more detailed analysis, based on credible data and not speculation, as the impact of deer on cultural resources/landscapes in NCPE parks.

Response:

Cultural landscapes are among the park resources and values NPS conserves under the NPS Organic Act (NPS Management Policies 2006, section 1.4.5). In addition, the National Historic Preservation Act of 1966, as amended (36 CFR Part 800), specifically states that federal agencies are required to "take into account the effects of their undertakings on historic properties." Historic properties are defined as any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. A cultural landscape, as defined by The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes, falls within the defined scope of a historic property. A cultural landscape is defined as "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." (National Park Service-Preservation Brief 36-Protecting Cultural Landscapes (NPS, 2011a). Section 106 of the National Historic Preservation Act requires the potential effects on cultural landscapes be considered as part of the decision-making process for this project. The significance of landscape plantings within a cultural landscape is determined during the Cultural Landscape Inventory/Cultural Landscape Report process. This process includes research and analysis of the multiple components of a cultural landscape. A cultural landscape can include the spatial organization, topography, vegetation, the built environment, land use, and views/vistas. Within National Capital Parks - East, cultural landscapes have been inventoried at Kenilworth Aquatic Gardens, Fort Dupont, Fort Mahan, Fort Chaplin, Shepherd Parkway, Oxon Cove Park/Oxon Hill Farm, Fort Foote, Harmony Hall, Fort Washington, and Piscataway Park including Marshall Hall. The National Register nomination form for Suitland Parkway lists landscape features which contribute to the significance of the Parkway, and a cultural landscape report has been prepared for the Baltimore-Washington Parkway. Cultural landscape inventories and cultural landscape reports are available at: <https://www.nps.gov/orgs/1027/landscapes.htm>.

Forests and other vegetation along with formal plantings, as documented in the cultural resource inventories, are contributing resources to the cultural landscapes. The lack of forest regeneration, as documented by the NCRN Inventory & Monitoring, will have long-term impacts on these contributing features. Additional damage caused by deer to these landscapes has been reported by NPS personnel.

Concern ID: 66144

**CONCERN
STATEMENT:**

Commenters suggested that the decline in native vegetation is due to invasive plants, not deer. A commenter suggested that rather than culling deer, efforts should be focused on invasive plants.

**Representative
Quote(s):**

Corr. ID: 50

Organization: Not Specified

Comment ID: 1023335

Organization Type: Unaffiliated Individual

Representative Quote: The time and effort spent on closing sites and conducting sharpshooting operations could be better spent targeting the invasive plants themselves through NPS invasive plant teams and volunteers

Corr. ID: 69

Organization: Not Specified

Comment ID: 1023336

Organization Type: Unaffiliated Individual

Representative Quote: Further, NPS needs to address other factors that negatively impact vegetation. Forests are complex ecosystems, and numerous factors affect regeneration. NPS's own studies have identified non-native plants as serious threats, yet NPS has done very little about this.

Corr. ID: 95

Organization: Save the Rock Creek Park Deer

Comment ID: 1023340

Organization Type:
Conservation/Preservation

Representative Quote: NPS falsely claims that killing native deer in Rock Creek Park will "protect and restore native plants and promote healthy and diverse forests." Yet the agency has *no* scientific evidence white-tailed deer are the principal cause of any decline in forest regeneration in Rock Creek Park. Instead, NPS has a multitude of evidence, cited in reports from 1996, 2000, 2004, 2005 and 2008, the real culprit for any decline in native vegetation is the pervasive presence of aggressive, non-native plant species that have invaded the park from neighboring properties, and are overgrowing and choking out the natural forest. In fact, for decades, invasive plants, not deer, have been the single most significant threat to the Park and to the forest as a whole.

This is true in the National Capital Parks - East areas as well. Where is the proof that killing

deer does anything to improve the situation. Removing the invasive plants is the solution, not removing the deer!

Corr. ID: 95

Organization: Save the Rock Creek Park Deer

Comment ID: 1023339

Organization Type:
Conservation/Preservation

Representative Quote: The Park Service is well aware that reports have shown that invasive plants are doing the damage in Rock Creek Park, and in all the parks for the last 30 years, not the native deer. Invasive plants are causing all the tree regeneration and seedling problems, not the deer. This is true in the entire National Capital Parks East region.

Response:

NPS agrees that invasive species have an impact on the park's native vegetation and ecological systems and notes, on page 17 of the EA, that nonnative species can outcompete and displace native species, particularly in disturbed areas. However, it is important to note that deer overbrowsing disturbs native species, causes impacts at all life stages, and can cause nonnative invasive species, which are not as palatable to deer, to colonize an area more rapidly.

The Plan is not a comprehensive vegetation management plan. The adaptive management approach of the Plan focuses on deer management and not nonnative invasive plant management. These two subjects are addressed in different planning efforts. The NCRN I&M, which includes National Capital Parks - East, studies indicators of the status and long-term trends of exotic trees and shrubs, exotic understory plants, and vines on trees. They compare levels of nonnative invasive species across the landscape throughout the region and the impacts to park native species. Current management guidelines and practices for the parks target the control of invasive plants as a top priority, and NPS uses volunteers, park staff, a contractor, and the National Capital Area Invasive Plant Management Team to control nonnative invasive plants in the park's natural areas.

Concern ID: 66145

**CONCERN
STATEMENT:**

Commenters stated that human activity and encroachment and other factors are the cause of the decline in native vegetation, not deer, and that NPS should address this issue. A commenter stated that NPS has protected deer habitat and that deer have become the dominant driver in the ecosystem. The commenter further argued that NPS' proposed action does not embrace nature, including the role of humans, and that NPS is trying to achieve NPS' definition of natural characteristics.

**Representative
Quote(s):**

Corr. ID: 9

Organization: none

Comment ID: 1023341

Organization Type: Unaffiliated Individual

Representative Quote: Human encroachment on animal habitat is the problem, not the deer.

The unchecked and easily outplayed controls on humans obliterating irreplaceable forests and open natural fields is the problem. The deer were here for 1000's of years, no problem. When European greed for more land to despoil reached the Americas, not only did the native flora and fauna start to disappear they also started to kill the humans who had peacefully coexisted with the native animals.

Don't start killing animals because of your ignorance of the role they play in keeping the earth within natural bounds. Better to keep humans, who at this point go unchecked in their ability to waste with impunity, in check. Maybe not by shooting them, but maybe teach them the importance of living within the bounds of reason when it comes to deciding who is the bigger problem.

Corr. ID: 71

Organization: Not Specified

Comment ID: 1023343

Organization Type: Unaffiliated Individual

Representative Quote: Most significantly, NPS is doing nothing to mitigate damage to vegetation caused by humans (e.g., bushwhacking).

Corr. ID: 90

Organization: Not Specified

Comment ID: 1023345

Organization Type: Unaffiliated Individual

Representative Quote: Humans are encroaching on wildlife and we are quickly losing wild spaces.

Corr. ID: 92

Organization: Not Specified

Comment ID: 1023333

Organization Type: Unaffiliated Individual

Representative Quote: In this case, while I acknowledge that the predators that may have once occupied the NCPE park lands (before extensive human settlement of the Washington, DC region) are no longer present thereby benefiting deer and other species. Instead of

embracing deer as a dominant driver in the modified ecosystem, the NPS intends to correct this perceived imbalance using bullets to reset and maintain the deer population at a level believed to be acceptable to promote forest regeneration, vegetation productivity and diversity, and, in turn, benefit wildlife, including deer. In other words, instead of embracing nature, including the role of humans in modifying and manipulating nature, and managing the parks utilizing that mindset, the NPS intends to kill potentially hundreds of deer over an indefinite period of time to achieve what the NPS believes represents the natural characteristics of its lands. In so doing, the NPS appears unfazed by the suffering that its plan will cause, not only to the deer that will be killed under the cover of darkness while eating bait purposefully used by the NPS to kill but to the residents of Washington, DC and Maryland and all of the visitors to Washington, DC who have enjoyed recreating in the NCPE parks to enjoy the natural beauty of the parks in a highly populated and developed region.

What is particularly perverse in regard to the proposed slaughter of deer on NCPE parks is that, because of the urban/suburban nature of these parks and the manipulation allowed by the NPS, to incentivize public use (including through the creation of open fields of grass for picnics and playing), the NPS has created the ideal deer habitat - woody habitat surrounded by open fields and residential properties. To create ideal deer habitat and then turn around, as the NPS has done, to blame the deer for virtually every ill that has reportedly befallen these parks and to promote their slaughter to ostensibly fix a system broken by the NPS is the height of hypocrisy and double-speak. To even contemplate such a massacre when there are effective alternatives that can reduce the deer population gradually and humanely demonstrates how misguided the NPS has become.

Response:

The NPS agrees that human activity has historically resulted in a decline in native vegetation. The native ecosystems within National Capital Parks - East are more precious as the area surrounding the park continues to be developed with native vegetation removals, habitat destruction, and increases in impervious surface. Overabundant deer populations continue to grow unchecked or remain at the current levels, causing ecosystem loss and changes in biodiversity, seral stage, and possibly adverse effects to other wildlife through competition or habitat destruction. NPS Management Policies allow for the management of both native and nonnative species (NPS Management Policies 2006, section 4.4.2.1, 4.4.4.2) to prevent adverse impacts to natural habitats and natural distributions and abundance of native species and ecosystem functions and processes.

The purpose of the proposed action is to develop a white-tailed deer management strategy that supports long-term protection, preservation, and restoration of native vegetation and cultural landscapes within parks administered by National Capital Parks - East. The desired deer density for this Plan is one that allows the forest to naturally regenerate, while maintaining a deer population within the park. The NPS manages at the landscape level for entire ecosystems.

APPENDIX B REFERENCES

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PEPC Project ID: 102432, DocumentID: 115847

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Status: New Park Correspondence Log:
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Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I believe the plan to reduce the population of White-Tailed Deer using sharpshooters should be implemented. I also believe that the planned population reduction should be increased.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 2

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As urban deer populations in the DC metropolitan area remained uncontrolled, we have suffered "an increase in deer-human conflicts including deer-related automobile accidents, damage to agricultural crops, residential gardens and landscaping, and concerns about communicable disease." (Note 1) Research from Cornell shows deer overpopulation has a serious negative impact on native birds, pollinators and other species. Deer overgrazing eliminates the plants other species need to feed and build shelter, reducing the biodiversity needed for a healthy ecosystem. (Note 2) As our deer no longer have natural predators, a sustained and careful culling might help bring the population back to a more natural level. Donating the meat to the less fortunate is healthy, respectful and cost-effective. The NPS' proposed deer management policy is a sound idea and should be implemented.

Note 1: See Montgomery County (MD), "Deer in Montgomery County."
<https://www.montgomeryparks.org/deer-management/>

Note 2: See The Cornell Lab, Living Bird Magazine, September 2020: "COuld Deer Hunting Improve Habitat for Forest Birds?" <https://www.allaboutbirds.org/news/could-deer-hunting-improve-habitat-for-forest-birds/>

PEPC Project ID: 102432, DocumentID: 115847

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Correspondence Text

The NPS should create an urban deer hunting season much similar to Alexandria, VA and Arlington, VA. This would allow hunters to harvest deer for personal consumption and anything over the established limit could be processed for use at shelters or food banks. I do not feel only allowing sharpshooters hunting at night is the best plan. DC/NPS could host hunters education programs along with conservation education to keep a healthy population while improving the lands that are hunted. Culling members of the herds and not using the meat wisely seems to go against the most basic spirit of hunting.

PEPC Project ID: 102432, DocumentID: 115847

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The deer population in PG County's suburban areas is totally out of control as noted in the report and anyone who frequents these parks. The State needs to allow bow hunters greater access to suburban and urban parks or this problem will never be controlled.

PEPC Project ID: 102432, DocumentID: 115847

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Status: New Park Correspondence Log:
Date Sent: Oct 6, 2021 Date Received: Oct 6, 2021
Number of Signatures: 1 Form Letter: No
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For the deer management plan, I propose a deer hunt. 2 to 4 man teams of hunters, for accountability. The hunt will last for 3-5 hours (per event). Hunters will be issued GPS trackers to locate their position (loss of the tracker will result in a fine to pay for it). With the trackers, we'll be able to monitor their movement, and warn them if they're close to another hunting team. Recurve bows only at first, with possibility of compound and crossbow trials at a later date (depending on the results of the first hunt). Hunters will be allowed to keep the deer harvested in the period, as well as compensation of \$50 for every deer harvested (payable to the one who brought it down).

As it goes without saying, no violence towards other hunters will be permitted. Any actions will result in swift expulsion via extraction teams, and law enforcement involvement if necessary. Emergency Response Personnel will be on site during the time of the event. All participants will sign a waiver releasing the jurisdiction/event coordination, and state of any liability (lost equipment, injury, death)

All contact info and addresses will be gathered ahead of the scheduled event. If possible, developing a basic functional app for the event would be preferable, so members will be easily contacted while not disrupting their hunt (via cell phone rings which would alert the deer)

Hunters are required to bring the deer down, swiftly and efficiently. Shoot it with the bow until its on the ground, and then to sever the jugular as to minimize suffering to the animals.
No alcohol will be permitted during the event, and anyone found violating will be fined/dealt with.

PEPC Project ID: 102432, DocumentID: 115847

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Notes:

Correspondence Text

I am totally opposed to any wildlife slaughter in national parks. You should be finding non lethal methods. The public wants innovative ideas, not the same old garbage. You are being lazy. If nps staff is not up to the task, hire some new people who can THINK. You say there are no "known" non lethal means. That tells me you are just using that as an excuse and don't want to find any other ways. The more you keep killing the more routine it gets. Now you are going to slaughter Bison in the Grand Canyon. Another disgrace.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 7

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
Potomac, MD 20854
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 6, 2021 Date Received: Oct 6, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I am a strict vegetarian and don't want to hurt any animal. But the deer population has become a hazard as so many cars get hit by deers while driving in the neighborhoods. Deers are in my backyard and even in front after it is dark. Some times I have to wait to come to the front door as they are standing in my drive way. It is not safe for humans to have so much deer population.

Count governments should take steps to reduce deer population in neighborhoods.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 8

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
Potomac, MD 20854
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 6, 2021 Date Received: Oct 6, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I am a strict vegetarian and don't want to hurt any animal. But the deer population has become a hazard as so many cars get hit by deers while driving in the neighborhoods. Deers are in my backyard and even in front after it is dark. Some times I have to wait to come to the front door as they are standing in my drive way. It is not safe for humans to have so much deer population.

Count governments should take steps to reduce deer population in neighborhoods.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 9

Author Information

Keep Private: No
Name: William W Miller
Organization: none
Organization Type: I-Unaffiliated Individual
Address: Spruell Drive
Kensington, MD 20895
USA
E-mail: generic1@earthlink.net

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 6, 2021 Date Received: Oct 6, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Human encroachment on animal habitat is the problem, not the deer.

The unchecked and easily outplayed controls on humans obliterating irreplaceable forests and open natural fields is the problem. The deer were here for 1000's of years, no problem. When European greed for more land to despoil reached the Americas, not only did the native flora and fauna start to disappear they also started to kill the humans who had peacefully coexisted with the native animals.

Don't start killing animals because of your ignorance of the role they play in keeping the earth within natural bounds. Better to keep humans, who at this point go unchecked in their ability to waste with impunity, in check. Maybe not by shooting them, but maybe teach them the importance of living within the bounds of reason when it comes to deciding who is the bigger problem.

I can't express in these few words the devastation caused by the malignant neglect by despoilers of this once beautiful garden.

We can't change the ugly past we've created but we can turn around the path we are now on that will lead to the degradation of us all.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 10

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
POTOMAC, MD 20854
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 6, 2021 Date Received: Oct 6, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

As a PhD biologist, I heartily approve of the plan. I can see the effects of out of control deer population in woodlands in the DC area which do not have the native understory herbs or seedlings that I observed & studied growing up here. The ecosystem is clearly badly out of balance and the proposal to humanely reduce the deer population is the only way I can see to restore a healthy ecosystem in the National Parks. I hope this can be expanded to other parts of the region outside NPS jurisdiction since this is a larger problem than just the parks.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 11

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
Washington, DC 20012
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 6, 2021 Date Received: Oct 6, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

We desperately need deer culling in Rock Creek Park in NW D.C. The neighborhoods of Crestwood and Colonial Village are inundated with deer- -on lawns, in the street, on sidewalks. The deer are everywhere, as is their waste.

We need culling as soon as possible. The situation is untenable.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 12

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
Manassas, VA 20110
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 6, 2021 Date Received: Oct 6, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

It has to be done. This is the most humane way.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 13

Author Information

Keep Private: No
Name: blanton
Organization:
Organization Type: I-Unaffiliated Individual
Address:
washington, DC 20011
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 6, 2021 Date Received: Oct 6, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

No need to cull the deer heard this season. Current population looks healthy, and there is no material disturbance to the community. Thanks, Blanton.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 14

Author Information

Keep Private: No
Name:
Organization: Kemp Mil Civic Association
Organization Type: I-Unaffiliated Individual
Address:
Silver Spring, MD 20902
USA
E-mail: vicepresident@kempmillcivic.org

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 6, 2021 Date Received: Oct 6, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I am writing to express concerns over the planned deer management. First off, I applaud you for not using ineffective and costly measures like spaying, vasectomies, and darting. Plenty of data from this region and Staten Island and other locations show those methods are ineffective and a massive waste of money.

If you look at other local jurisdictions that have embarked on deer culling, such as the MNCPPC, you will find that seedling density will go up after sustained culling operations. (Wheaton Regional Park is a great example. They've had sharpshooting since about 2005.) The issue is what kind of seedlings grow. We have a huge problem here of invasives like the Tree of heaven, Japanese stilt grass, mile-a-minute-porcelain berry etc. These plants provide little benefit to local wildlife. Once you reduce the deer population, the undergrowth will shoot up including tons of plants that choke out natives.

Please consider embarking on invasive removal before sharpshooting. You could even use scientific method of different approaches in different parks. Some parks you could do invasive removal. Other parks you could do sharpshooting and invasive removal. And in yet other parks you could just do sharpshooting. After 10 years I would argue the best results would come from both sharpshooting and invasive removal.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 15

Author Information

Keep Private: No
Name: alberta paul
Organization: Penn Branch Community Association Inc.,
Organization Type: I-Unaffiliated Individual
Address: 3721 Carpenter Street SE
Washington, DC 20020
USA
E-mail: Pennbranch2005@aol.com

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I live between Fort Davis Drive SE, Massachusetts Ave SE, and 38th Street SE, where the deer population has increased tremendously. They travel in small herds of 6 -20 throughout the late evenings to early dawn. Canvassing through my back yards and the yards of my many neighbors consuming all vegetation that you may have on your property.

Of course, leaving piles of unsanitary poop, ticks, and tremendous damage to all seedling trees, planted on property to mitigate erosion. I encourage all efforts used to reduce this population throughout the District of Columbia to be humane and the same measures selected to reduce this population in one ward should be exercised in all wards.

To assist with this effort, science should be used to feed them on NPS property that has a medication that puts them to sleep, so they can be picked up and taken to the upper mountainous areas of Maryland and Virginia. A small grant program that allows a resident to purchase sound alarms throughout their property, creating a fence of noise that merely scares them away from entering the residential property, where they can leave dangerous ticks, and poop,

A neutering program could also be implemented with the female deers, which would reduce the increase out of control population. Their movement across our roadways at night and early dawn have as you know resulted in serious property damage as well as physical drivers injuries. We have been lucky these encounters have not resulted in anyone's death

A monitoring program for a year is truly required to get a more accurate count of this population and their movement across all sectors of the city. Many of them entered dangerous terrain (hilly property), tried to jump, and have broken legs, necks and died on residential property. Their removal currently is the responsibility of the resident, who may be a senior and cannot move these heavy caucuses to public

space, where the local government will come and remove them. So you should take on the ownership during this monitoring period to remove these caucuses.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 16

Author Information

Keep Private: No
Name: John Kinsella
Organization:
Organization Type: I-Unaffiliated Individual
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Washington, DC 20010
USA
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Is there any way to introduce predators like wolves or coyotes into parks in the DC area? They would take care of the excess deer population.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 17

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
Washington, DC 20001
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

NO KILLING INNOCENT ANIMALS. NO NO NO NO NO NO NO. GUNS ARE NOT NATURAL
LET THE ENVIRONMENT WORK ITSELF OUT. NO KILLING DEER.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 18

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
falls church, VA 22044
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Where does the meat go from the deer and how does one sign up to be a sharpshooter?

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 19

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
Washington, DC 20009
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

This is a HORRIFIC and EVIL plan. Murdering innocent deer will solve nothing and leave only blood on the hands of the National Park and the DMV region. Surely the deer can be transported to other locations, they shouldn't have to suffer because of the city's greedy desires to tear down their natural habitat.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 20

Author Information

Keep Private: No
Name: Steven Feingold
Organization:
Organization Type: I-Unaffiliated Individual
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I strongly support the proposed actions to reduce deer overpopulation in the parks. I frequently visit Anacostia and Kenilworth Parks and would like to see as healthy a forest ecosystem as possible. I have seen first hand how too much deer browsing negatively effects the forest on my family's land, and am excited to see active management take place for our natural areas in the District.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 21

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
Silver Spring, MD 20902
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Deer population in entire metro area needs to be reduced drastically. Thank you for addressing this.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 22

Author Information

Keep Private: No
Name: ANNE GUGLIK
Organization:
Organization Type: I-Unaffiliated Individual
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I strongly support an aggressive management plan. Seedling density in nearby Greenbelt Park is near zero, and the deer overpopulation is also increasing the tick population to the point where hiking without permethrin is unwise. We have foxes to take care of the rodents, but nothing to control the deer.

I'm in favor of both direct reduction through managed hunts and indirect control through contraceptive measures.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 23

Author Information

Keep Private: No
Name: Aaron Parrott
Organization:
Organization Type: I-Unaffiliated Individual
Address: 95 54th Street SE
Washington, DC 20019
USA
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I am in support of the NO ACTION plan within the Deer management plan. I am not in support of lethal killing of deer. I am also unclear on the difference between overabundance and overpopulation. Does this plan use them synonymously or is there a different threshold for overabundance. Clarity would help understand the plan better.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 24

Author Information

Keep Private: No
Name: Jonathan S
Organization:
Organization Type: I-Unaffiliated Individual
Address:
washington, DC 20003
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I support the continuation and expansion of this East Deer Management program. Given the area no longer has predators which prey on deer which helps to keep the deer population in check, we must have a means of culling the herd. This appears to be the most humane means of achieving this goal and the program should continue.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 25

Author Information

Keep Private: No
Name: Jared A Hautamaki
Organization:
Organization Type: I-Unaffiliated Individual
Address: 3002 Blueridge Ave
Silver Spring, MD 20902
USA
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please consider allowing Native Americans in the DC area who have tribal hunting licenses be permitted to take deer. For some of us it is difficult and expensive to return to our tribal homelands or treaty areas in order to exercise hunting rights. Many of us are federal employees and it should be easy enough to ascertain our tribal membership, hunter safety training and conduct a lottery to allow us to use either bow or shotgun within the parameters of your reduction efforts.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 26

Author Information

Keep Private: No
Name: Deborita
Organization:
Organization Type: I-Unaffiliated Individual
Address:
Washington, DC 20032
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I endorse the culling and want it to occur regularly, please. As a former Capital Area Food Bank employee, I'm more than willing to help recipients of the meat learn how to cook it!

Tamar Haspel is an expert, below are excerpts
<https://www.washingtonpost.com/food/2021/09/23/venison-eco-friendly-hunting/>

besides spreading disease and causing erosion by decimating plants, deer are involved in car crashes and other damage.

"on a per-pound basis, deer are responsible for more methane than cattle.

Think about what that means. We have to grow the cattle to have beef, so you're adding methane to the atmosphere with every steak. But the deer are wild, so you're subtracting methane with every steak. Not only the methane that your deer will no longer be producing, but also, if it's a doe, the methane her progeny will also not be producing."

AND the carbon load comes from their mouths, not the other end, as most people would think LOL

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 27

Author Information

Keep Private: No
Name: Anne Marie Grunberg
Organization:
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Correspondence Information

Status: New
Date Sent: Oct 7, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Oct 7, 2021
Form Letter: No

Correspondence Text

I totally agree that the deer need to have their numbers managed. I would like for a study to be conducted regarding the feasibility of introducing red wolves into such parks as a way to sustainability keep the deer population in check as well.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 28

Author Information

Keep Private: No
Name: Wilsom H Frazier
Organization:
Organization Type: I-Unaffiliated Individual
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USA
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I live on the edge of Ft DuPont, Chaplain, , frequent Rock Creek Park, and use BW Parkway frequently. From nearly daily walks in Ft DuPont and Chaplain the deer population is decimating the growth of new plants and the deer still appear under weight. The population is not sustainable. Also as a vector of Lyme disease, reducing the population is critical. I want the pros to thrive for future generations and reducing the deer population will greatly aid in that. Also, people may complain about killing the animals, or wanting to sterilize them which doesn't stop the decimation of new plants growth and forces them into neighborhoods in search of food, increasing the likelihood of accidents.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 29

Author Information

Keep Private: No
Name: Jody D Hoffman
Organization:
Organization Type: I-Unaffiliated Individual
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Kensett, IA 50448
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Correspondence Information

Status: New
Date Sent: Oct 7, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Oct 7, 2021
Form Letter: No

Correspondence Text

The best way is to have organized hunts. The cost of the license will help to replant/restore the vegetation.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 30

Author Information

Keep Private: No
Name: Randolph T Clarke
Organization:
Organization Type: I-Unaffiliated Individual
Address: 2939 VAN NESS ST NW
Washington, DC 20008
USA
E-mail: rtclarkeiii@yahoo.com

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Currently venison is given to the needy. This is not good economics, since venison can go for \$30 @ lb! Better have a fund raising feast for those of us who have more money, and give the cash to the needy. Cash would feed the needy longer and better than venison hamburger.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 31

Author Information

Keep Private: No
Name: Kelly Henson
Organization:
Organization Type: I-Unaffiliated Individual
Address: 2133 32ND ST SE
Washington, DC 20020
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 7, 2021 Date Received: Oct 7, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I support humane methods of curtailing the deer population. See the below link for suggestions from the Humane Society:
<https://www.humanesociety.org/resources/controlling-deer-populations-humanely>

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 32

Author Information

Keep Private: No
Name: Joseph M Carr
Organization:
Organization Type: I-Unaffiliated Individual
Address: 912 uniontown rd
Westminster, MD 21158
USA
E-mail: Admin@jaspercomp.com

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 8, 2021 Date Received: Oct 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Managed public hunts are the answer, hunting has always proved to be an effective way of managing wildlife and fee based hunting would raise a lot of money for other management projects. The sensitivities of the population and NPS should reflect ALL Americans. NPS has had a adversarial relationship to sportsmen for a long time and yet sportsmen are the best stewards of the land.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 33

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
washington, DC 20002
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 9, 2021 Date Received: Oct 9, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Before I discuss methods, I think its best that we define our priorities. And of coarse nature and a healthy population of deer should be taken into account, but we must not let these take away from the most important priority to the people of the DMV, building and sustaining a healthy population of wild zebras. Currently there are only a few left naturally roaming these parks, so we may need some help from the national zoo to initially boost the zebra population.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 34

Author Information

Keep Private: No
Name: Corinne S Irwin
Organization:
Organization Type: I-Unaffiliated Individual
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Washington, DC 20024
USA
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 10, 2021 Date Received: Oct 10, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I support the Park Service's plans to control the deer population in National Capital Parks-East.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 35

Author Information

Keep Private: No
Name:
Organization:
Organization Type: I-Unaffiliated Individual
Address:
moab, UT 84532
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 10, 2021 Date Received: Oct 10, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I recommend you reintroduce natural predators to the area. The Red wolf, mountain lion, coyote, and black bear would be a good start.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 36

Author Information

Keep Private: No
Name: John Ausema
Organization:
Organization Type: I-Unaffiliated Individual
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 11, 2021 Date Received: Oct 11, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I am writing to support the proposed action to reduce the deer population. The evidence provided in the report strongly supports the conclusion that the ecosystem is suffering from overbrowsing by deer. Deer reduction has been successfully carried out by NPS in other parks in the mid-Atlantic region. No other control method (besides sharpshooting) is likely to be effective.

We should move forward with a similar plan for the parks in the proposed plan.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 37

Author Information

Keep Private: No
Name: Rose M Kim
Organization: Resident
Organization Type: I-Unaffiliated Individual
Address: 15100 West Auburn Road
Accokeek, MD 20607
USA
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Correspondence Information

Status: New
Date Sent: Oct 12, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Oct 12, 2021
Form Letter: No

Correspondence Text

Full support this plan.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 38

Author Information

Keep Private: No
Name: M Hult
Organization: None
Organization Type: I-Unaffiliated Individual
Address:
Greenbelt, MD 20770
USA

E-mail:

Correspondence Information

Status: New
Date Sent: Oct 12, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Oct 12, 2021
Form Letter: No

Correspondence Text

I fully support any efforts to reduce local deer populations. The lack of understory plants and saplings in nearly every nearby wooded area I have visited in the past several years/decades is alarming. I don't think many people who use these areas for recreation know that they're seeing unhealthy and unsustainable levels of deer browsing and are only thinking about "Bambi". When the mature trees die and no younger trees are there to replace them, the area will be unfit for deer and many other plants, animals, and forms of recreation that only forests can provide. Thank you for your efforts!

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 39

Author Information

Keep Private: No
Name: Guillermo Galdamez Barrera
Organization:
Organization Type: I-Unaffiliated Individual
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Washington, DC 20020
USA
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 13, 2021 Date Received: Oct 13, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I fully support the efforts by NPS to control deer populations in the National Parks East region.

As a resident of Historic Anacostia, I enjoy walking alongside Anacostia Park and the trails around Ft Stanton. When walking along the hiker-biker trail, I can experience the effect of the deer overpopulation because of the proliferation of ticks, and the proliferation of invasive plants. I expect my walks and experience along the parks will be improved with fewer deer in the area.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 40

Author Information

Keep Private: No
Name: julie a lafave
Organization:
Organization Type: I-Unaffiliated Individual
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United States, DC 20003
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E-mail: juliealafave@hotmail.com

Correspondence Information

Status: New
Date Sent: Oct 13, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Oct 13, 2021
Form Letter: No

Correspondence Text

please stop killing deer.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 41

Author Information

Keep Private: No
Name: Alex M Carroll
Organization: N/A
Organization Type: I-Unaffiliated Individual
Address:
Fairfax, VA 22039
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 17, 2021 Date Received: Oct 17, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I would recommend making the full plan a bit more accessible. Most of the documents on the plan are a bit dense, it may be a good idea to lay things out in a way the public can see and understand quicker.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 42

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Status: New
Date Sent: Oct 18, 2021
Number of Signatures: 1
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Park Correspondence Log:
Date Received: Oct 18, 2021
Form Letter: No

Correspondence Text

I liked the way this meeting was run, and how the host went through the questions to direct each one to the person best suited to answer it. Most of the questions were answered, so the meeting was thorough. The only thing that I didn't get from the meeting is seeing how this plan works out! Hope all goes well. Thanks for the info!

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 43

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Status: New Park Correspondence Log:
Date Sent: Oct 18, 2021 Date Received: Oct 18, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I agree with the premise of the EA that the deer population in our region's park system is too high. I challenge and question the means of managing that population through sharpshooters. The EA states that it will control the deer population through sharpshooters as a matter-of-fact and doesn't give any consideration to a historically natural and proven means of prey population control, the reintroduction of an apex predator, i.e. the grey wolf. The White-Tailed Deer Management Plan EA should study the effects of reducing the deer population through the reintroduction of a historically-native apex predator, i.e. the grey wolf.

- There were 172 homicides in DC in 2021 and close to 2,000 guns recovered in 2019 (latest available numbers: <https://mpdc.dc.gov/page/district-crime-data-glance>). Does our city need more guns?
- There have been 0 instances of a wolf killing a human since the start of the 20th century (<https://wolf.org/wp-content/uploads/2013/05/Are-Wolves-Dangerous-to-Humans.pdf>)
- Multiple wolf species are native to this region (https://www.graywolfconservation.com/Wild_Wolves/history.htm)
- The Yellowstone wolves are said to have had a "trophic cascade" of effects on the ecosystem. The EA should determine if the same effects could occur in our park system. (see: <https://www.youtube.com/watch?v=ysa5OBhXz-Q>)
- Grey wolf tourism in Yellowstone has boosted the local economy by \$5 million annually. (<https://www.yellowstonepark.com/news/gray-wolves-increase-tourism-in-yellowstone-national-park/>)
- The Native Americans had a saying. "It is the caribou which feeds the wolf...but it is the wolf, which keeps the caribou strong".

I would like your biologist to weigh-in on the merits and drawbacks of reintroducing wolves to cull the deer population. Thank you.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 44

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Oct 19, 2021 Date Received: Oct 19, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I am pleased to learn of the National Park Service's Capital Parks- East proposal to engage in management of the white tail deer population in areas under its purview, including Piscataway Park and Fort Washington Park. As a resident in the area, and as former wildlife officer and participant in white tail deer studies I can corroborate the Service's findings that the population density is outside of the range that is healthful both for the deer, and for the surrounding habitat. My observations don't arise from a scientific study, my anecdotal observations include:

- Deer are bold, accustomed to humans and are frequently in or adjacent to roadways-ever more so as remaining intact habitat is converted to housing and retail developments.
- Deer mortality on regional and rural roadways is a comparatively common occurrence.
- Vegetation in intact forested areas is substantially absent at heights under four feet, and taller vegetation is typically stripped of leaves below that height- including species that white tail deer typically avoid in areas where preferred browse material is still available.
- Deer aggregations of tens of animals are observed from time to time.
- Deer manifesting injuries and/or poor body condition including skin/coat maladies and malnourishment are commonplace.

These circumstances are indications of the overabundance of deer in the area, and the likelihood that persistent over population will exacerbate risk of tick-borne illness that can impact humans, pets and wildlife and of the emergence of more disease among the deer.

Accordingly, I write in support of the Park Services proposal to engage in lethal control as warranted and necessary to bring the long-term deer population into closer line with healthy density levels. I am writing to underscore and emphasize the need to include the lands comprising the Northern Annex of Piscataway Park, that lie to the east of Fort Washington Park, within the management area. In addition to the parameters set forth in the Service's Environmental Assessment (2021), and in program year 2 and beyond, please consider whether a program can be established to incorporate indigenous practitioners into the decision-making process for control of white tail deer on lands that state-recognized tribal

members are currently displaced from. The Park Service should explore avenues to extend opportunities to participate in management decisions and, to the extent practicable, to participate in additional control measures. The service might also consider whether the National Zoo could utilize meat that is found unsuitable for donation for human consumption.

I appreciate the Park Service's attention to management of white tail deer in this region, and look forward to greater involvement by the Service in planning and Stewardship of the Northern Annex.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 45

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Status: New Park Correspondence Log:
Date Sent: Oct 21, 2021 Date Received: Oct 21, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Ward 8 Woods Conservancy Testimony on National Capital Parks - East Deer Management Plan

October 21, 2021

Ward 8 Woods Conservancy is a grassroots nonprofit organization that works to rejuvenate and enhance the beauty, ecological health, and public enjoyment of the more than 500 acres of forest in the Ward 8 section of Washington, DC, for the benefit of all. We engage residents as paid staff and as volunteers to restore the woodland ecology, build trails, and promote healthy and sustainable living. We use the woods as a tool for healing and empowerment.

Since 2018, our staff and volunteers have removed more than 550,000 pounds of trash from forested areas in Ward 8 and cut invasive vines from more than 3,000 trees. We have Site Stewardship Volunteer Agreements with NACE for Ft. Stanton Park and Shepherd Parkway. We have also done extensive work in Oxon Run Parkway and NACE lands along Suitland Parkway.

Our staff spend more time on NACE land in Ward 8 than anyone else, so we see firsthand the harmful effects of deer overpopulation. In portions of Shepherd Parkway, the understory is dominated by pawpaw because deer have devoured all the sapling of other species. In many upland areas, there is no understory at all, deer having eaten any and all groundcover. Groves of mountain laurel are stripped of their lower leaves, severely weakening the shrubs and causing some to die.

The constant grazing of saplings by deer prevents young trees from emerging. When older trees die, leaving gaps in the canopy that are exploited by invasives. These invasives, which the deer avoid, are often the only plants left uneaten, exacerbating their explosive growth.

The deer themselves do not look healthy or happy. Many appear frail and starving, and we see their corpses by the sides of roads and in the woods. This highly urbanized area cannot provide them with a safe and healthy habitat in such numbers.

Ward 8 Woods strongly supports the proposal to expand the use of sharpshooters to cull deer herds throughout NACE lands. We feel that aggressive deer management is a necessary complement to our restoration work. We applaud NPS leadership in recognizing and acting to address the problem head-on, despite vocal opposition.

We respect the views and good intentions of animal advocates who approve the proposed action, and we wish it weren't necessary. White tailed deer are gentle, majestic animals with whom we rightly sympathize. But it wouldn't be responsible to allow deer to continue damaging our already stressed ecosystems. Doing nothing is not an option, and alternatives such as birth control and relocation have unfortunately proved ineffective and expensive.

Ward 8 Woods advocates for swift and thorough implementation of the Deer Management Plan, and looks forward to observing the positive effects of a more sustainable deer population in the years to come.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 46

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Status: New Park Correspondence Log:
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Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I agree with the current EA proposal that aims to expand forest regeneration efforts by removing white-tailed deer. I applaud efforts to maintain and preserve the parks' natural habitats while developing an effective management plan in dealing with deer impacts over the next 20 years.

While I agree with your preferred plan, I was disappointed that there was no mention of the management framework utilized to manage such large areas. I think the public would benefit greatly in knowing that information. Secondly, there was no mention in the EA of any future efforts to determine the parks' carrying capacities for deer or any plans to define standards and indicators to deer impacts. This information is critical to an adaptable management plan that aims to be efficient and effective at mitigating impacts. Thirdly, the EA does not mention the frequency of monitoring data for deer and vegetation under the evolving management plan. I find the public would find that helpful information. Lastly, are sharpshooters gathering data for all lethal removal efforts at the parks?

Thank you for your efforts.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 47

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Status: New Park Correspondence Log:
Date Sent: Oct 24, 2021 Date Received: Oct 24, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Why not use GonaCon, instead of killing the deer in Rock creek Park? It works on both males and females by stimulating the production of antibodies that interfere with the production of sex hormones called gonadotropins, thereby decreasing sexual activity and inhibiting reproduction "as long as a sufficient level of antibody activity is present," according to the USDA. The vaccine lasts several years and has been used to control populations of deer and wild horses in the U.S., wild cattle in Hong Kong and kangaroos in Australia.

GonaCon, which the U.S. Department of Agriculture's (USDA) National Wildlife Research Center developed in the early 1990s as a contraceptive for deer, according to a USDA description of the drug.

I don't think it's necessary to cull the deer by killing them if there is an effective and proven birth control method already in place in other parts of USA and by the USDA!!!

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 48

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Status: New Park Correspondence Log:
Date Sent: Oct 24, 2021 Date Received: Oct 24, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I am writing in support of the proposed action by the National Park Service regarding the Deer Management Plan in the National Capital Parks of Maryland and Washington D.C. While reviewing the deer management plan, I found that action should be taken to protect the biodiversity of the National Parks in question. The examples of the effects of overpopulation shown in Greenbelt Park and Fort Washington Park were troubling and show the seedling regeneration is very much lacking due to deer population. I believe that the proposed action of deer population surveys along with vegetation monitoring should go into effect. With extensive research and data, any evidence of overpopulation of the white-tailed deer would be clear to show that lethal action should be taken. While the specific issue being addressed surrounds local plant-life, I believe it would also be effective to study the impact of increased deer population on tick populations, and subsequently tick-borne illnesses such as Lyme Disease. In a Cornell study, a team began a study by sectioning off three deer management zones with different approaches; "fertility control, using surgical sterilization; recreational hunting; and no management" (Navarra and Wiegand 2019). While this approach was not initially successful, the team then planted oak seedlings, which showed the number of deer in each region due to their affinity for the plant (Navarra and Wiegand 2019). This could be an interesting addition to the proposed plan for the beltway parks.

References:

Navarra, Katie, and Jana Weigand. 2019. "10-year study provides model for deer management strategies." Cornell University November 14, 2019. <https://news.cornell.edu/stories/2019/11/10-year-study-provides-model-deer-management-strategies>

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 49

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Status: New Park Correspondence Log:
Date Sent: Oct 31, 2021 Date Received: Oct 31, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

The restoration and protection of native plants within our forests is a great necessity that we must continue to strive for. The population of white-tailed deer can be a significant problem to the forest habitats of our deciduous forests, as their natural predators of bobcats, wolves, and coyotes have significantly smaller populations and cannot curb the growth that this species has in its current ecosystem. Their overpopulation, combined with their lack of a significant predator to keep them in check, can, and has, caused a significant detriment to the vegetation of their ecosystem through their need to eat their necessary resource vegetation. This in turn leaves an opening for invasive plant species to grow within the area and reduce the biodiversity of the surrounding ecosystem, causing a spiral of detrimental happenings to the environment.

The National Capital Parks - East's proposed white-tailed deer management plan is a plan that I believe would greatly reduce the stress placed upon the park's vegetative ecosystems via the reduction of the white-tailed deer population. Doing so allows for the restoration of native plants to more sufficient levels to prevent endangerment, while also promoting the forest as a whole. However, I would urge the National Capital Parks - East to also consider a more natural method that foregoes having to implement the usage of hunting the species in the area to half of what it currently is per square mile.

I would recommend further research into natural predators for the white-tailed deer, such as wolves, coyotes, and bobcats, and the reintroduction or rehabilitation of their populations to provide a more natural method of keeping the ecosystem in check. This, in turn, would negate the necessity for humans to be considered the white-tailed deer's only predator via hunting in order to keep populations under control. While hunting may seem to be the easiest course of action, that does not necessarily mean that it is environmentally justified as the truest answer to the problem. The reintroduction of natural predators would serve to naturally push both populations into a mutual existence that would keep both in check, thus alleviating the need to kill half of the white-tailed deer population. Furthermore, combined with this

method, removal of invasive species from the park land would also allow for the native plants to have more room to continue growing, diversifying, and stabilizing the ecosystem. I thank you for your time, and I hope that my proposed method is taken into consideration as an additional alternative.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 50

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Status: New Park Correspondence Log:
Date Sent: Nov 4, 2021 Date Received: Nov 4, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

How effective will deer management be for the Baltimore Washington Parkway? Based on the maps provided the Baltimore Washington Parkway corridor contains very narrow strips of parkland. I find it hard to believe that deer are actually living and breeding exclusively within these narrow parklands. Any deer killed by sharpshooters can easily be replaced by deer that live in the surrounding neighborhoods and parks, including the adjacent Patuxent Wildlife Research Refuge. Similarly PWRR has had hunting within the refuge for years. As well as the sharpshooting program at the Beltsville Agriculture Research Center. Have these programs effectively controlled the deer population?

The same could be said for the other sites listed - many such as Ft Washington and Ft Foote are small urban parks surrounded by communities with high deer populations. Sharpshooting all deer including does and fawns is not only inhumane but will just bring additional deer from the surrounding areas to replace those lost. They can take advantage of fewer competition and produce more offspring.

The time and effort spent on closing sites and conducting sharpshooting operations could be better spent targeting the invasive plants themselves through NPS invasive plant teams and volunteers . As well as birth control for the deer.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 51

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Status: New Park Correspondence Log:
Date Sent: Nov 5, 2021 Date Received: Nov 5, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please work to limit the deer population where deer have over populated an area. I have led field trips for the Maryland Native Plant Society in the Civil War Forts for the past 20 years. I have seen the lack of tree seedlings as a consequence of deer predation. a reasonable number of deer is part of the forest ecology but overpopulation is destructive.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 52

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Status: New Park Correspondence Log:
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Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I support the proposed deer management plan.

I use Greenbelt park and the various DC forts parks regularly and agrees that the health risk associated with omnipresent ticks and the slow death of the forest because of lack of regeneration calls for action to be taken as soon as possible. I also used the BW parkway and fear hitting deer at night.

I appreciated the detailed description of the method NPS plans to use, the review of alternative methods, and the efforts to donate to food banks if possible.

I have one request:

I am a resident of Greenbelt and live right next to the Greenbelt Forest Preserve which is adjacent to the Baltimore Washington Parkway. I would like to request that the management plan includes the area of the scenic easement that NPS holds in the Greenbelt Forest Preserve. This is an excellent location to safely set bait stations along the parkway.

Thank you
Catherine Plaisant

PEPC Project ID: 102432, DocumentID: 115847

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Status: New Park Correspondence Log:
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Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I support the plan. I have spent many hours exploring the parks of national capital east and I see the devastation from deer.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 54

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Status: New Park Correspondence Log:
Date Sent: Nov 6, 2021 Date Received: Nov 6, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please consider a deer management program for the Forts and other parks in the DC vicinity. By keeping the deer population to a minimum, we should a marked improvement in the diversity of the flora. It may also curb the progress of the invasives. Thank you

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 55

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Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Nov 6, 2021
Form Letter: No

Correspondence Text

Please consider a deer management program for the Forts and other parks in the DC vicinity. By keeping the deer population to a minimum, we should a marked improvement in the diversity of the flora. It may also curb the progress of the invasives. Thank you

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 56

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Loss of tree cover and vegetation presents a very real threat to Piscataway Park and to Mount Vernon's viewshed. Environmental conservation is also deeply intertwined with Indigenous cultural preservation and the stewardship of ancestral homelands. The Foundation is interested in developing a Native Habitat Restoration program in Piscataway Park, in collaboration with NPS, Piscataway Tribal members and groups, and other stakeholders. Working together, we hope to mitigate and reverse habitat degradation due to shoreline erosion, deer browsing, and the imbalance between native and invasive plants.

Management of deer and other wildlife is a critical element of protecting natural and cultural resources in Piscataway Park. Deer hunting, use of hides and deer meat, all are part of traditional Indigenous culture. As NPS considers impacts and how to reduce deer in the park, we encourage consultation with Native people to understand impacts of deer and how they might use deer hides and other materials for important traditional arts and cultural practices.

The Accokeek Foundation's work centers around achieving the following impact: Visitors experience the interconnectedness of all life as they come to know the historical and cultural significance and regenerative potential of the Indigenous landscape that is Piscataway Park. The Accokeek Foundation is effectively expanding initiatives to engage public audiences in programming based on Indigenous land-based stewardship ethics and values and to connect people with the landscape. Our Indigenous land-based programs focus on engaging with Native communities strategically through the practices of agroecology, traditional foodways, an indigenous food sovereignty program or seed rematriation (heirloom gardens), and supporting a healthy relationship with food and the use of domesticated livestock, wild game, and fishing for sustenance.

The Accokeek Foundation encourages NPS's consultation with Tribal partners to identify impacts and opportunities presented by the deer management activities.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 57

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Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

November 8, 2021

Tara Morrison, Superintendent
ATTN: Deer Management Plan/EA Comments
National Capital Parks - East
1900 Anacostia Drive, SE
Washington, DC 20020

Re: NPS Deer Management Plan/Environmental Assessment

Dear Superintendent Morrison:

We are writing on behalf of City Wildlife, a 501(c)(3) organization located at 15 Oglethorpe St., Washington, D.C. 20011, the only licensed wildlife rehabilitation organization in the District of Columbia. We provide care for orphaned and injured wildlife with the purpose of return to the wild, and we work with a broad variety of individuals, public agencies (including NPS), and private organizations to support and promote an environmentally sound and healthy environment that enriches the lives of people and wild animals alike. City Wildlife is dedicated to preserving the lives of wildlife and protecting the habitats that sustain them. We enjoy - - and value - - our cooperative working relationship with NPS resource managers in the District of Columbia and appreciate that NPS shares these goals.

We are grateful for this opportunity to comment and share our thoughts with you on this Deer Management Plan / Environmental Assessment (EA) that would expand lethal control of White-tailed deer (*Odocoileus virginianus*) throughout parts of the National Capital Parks East (NACE). We sympathize with the many considerations facing the National Park Service (NPS) and its managers as

they struggle to deal with the issue of white-tailed deer 'overabundance' in National Parks. That said, we find the current proposal to expand lethal controls throughout NACE lacks a solid approach in science and has been advanced without sufficient response to concerns we raised during public input and review. The fact that this document is put forward as a combined management plan / environmental assessment suggests that NPS has already decided to move forward with a cull, despite scoping comments made by City Wildlife and others about issues that have not been addressed in this EA. This is inconsistent with the spirit if not the actual mandate for review under the National Environmental Policy Act (NEPA). For this and other reasons enumerated below, we feel a more thorough NEPA review is required. We address our specific concerns below.

Purpose and Need:

The EA argues a need for action because an overabundance of deer is "degrading vegetation and the habitats of other native wildlife" (footnote 1) throughout NACE. What the deer -plant relationships should look like (i.e., a 'natural' state) is a matter of speculation and needs to be backed up by science. The proposal to reduce deer populations to the level established in field research on commercial forest restocking, for example, seems arbitrary and should be justified.

The National Park Service is mandated to protect and preserve the parks and the natural systems and cultural resources that occur in them and to allow for natural processes to regulate their biotic communities to the extent possible. "To the extent possible" is generally taken to mean except where human influences make "natural" regulation unlikely or perhaps even impossible. NPS is different from other resource management agencies in this respect and arguably cannot afford a management program that is composed of actions taken by individual parks (footnote 2). We raised this concern in our scoping letter to you, hoping that it would generate a thoughtful response if not defense of the standard for management being adopted. It remains to be addressed, however, along with (footnote 3) the policy implications it generates.

1 EA, Pg. 3

2 Porter, W. F., & Underwood, H. B. (1999). Of elephants and blind men: deer management in the US National Parks. *Ecological Applications*, 9(1), 3-9.

3 See also EA, Pg. 22.

Science concerns:

NPS bases its management actions on the "best available science" (footnote 4). The EA establishes a justification for deer culling based on fewer than five cited peer-reviewed studies, with more than 20 references citing information from what represents 'gray' literature - information such as reports that have not been subject to rigorous qualified review. The EA directly acknowledges this and notes that its analysis: "...includes a qualitative assessment of how increases or decreases in deer overbrowsing affects vegetation, and how these effects result in the degradation or restoration of cultural landscapes." (EA: 26). To propose as much as a twenty year-long management regimen on such a basis seems inadvisable, especially since numerous studies of deer contraceptives are underway that could radically alter how deer populations could be controlled.

4 <https://www.nps.gov/subjects/science/science-to-work.htm>

Experimental research:

A critical question NPS must answer is: how many deer are appropriate? (footnote 5). There is no way this question will be answered without undertaking an approach that employs different types of experimental design (footnote 6). There is ample documentation in the scientific literature that deer are having negative impacts on the vegetative communities in many parts of the eastern and central states, yet experimental measures of the extent and duration of impact events remain scarce (footnote 7), even at NPS. We raised this in our scoping comments and are disappointed to find that the issue has not been addressed in the EA, even when such data should be or could have been available from NPS's long history with deer in Rock Creek Park.

5 Porter, W. F. (1997). Ignorance, arrogance, and the process of managing overabundant deer. *Wildlife Society Bulletin*, 25(2), 408-412.

6 Treves, A., et al. (2019). Predator control needs a standard of unbiased randomized experiments with cross-over design. *Frontiers in Ecology and Evolution* 7: 462-476.

7 Russell, F. L., Zippin, D. B., & Fowler, N. L. (2001). Effects of white-tailed deer (*Odocoileus virginianus*) on plants, plant populations and communities: a review. *The American Midland Naturalist*, 146(1), 1-26.

Landscape considerations in individual parks:

The proposal would add a substantial number of new land units to the existing NCRN deer management program. NPS must demonstrate for each parcel that both deer as well as plant communities have been studied and monitored to no less a standard than has been the case elsewhere. Each unit has its own set of issues and criteria for management and a "one size fits all" approach does not provide a sufficient or justifiable basis for management action.

The EA also suggests a need to reduce deer numbers to preserve cultural landscapes, basing this on assertions such as that deer create trails can turn into social trails, and that the reduction of deer populations "...may reduce ongoing damage to earthworks and circulation in general throughout the cultural landscapes within NACE." (footnote 8). It is unclear what this means in the context of these parks and is not backed up by details for each park.

8 EA. Pg. 27.

Coordination with state and local agencies:

We asked in our scoping comments that NPS identify how it has, or will, coordinate its management plans with state and local agencies. The EA indicates some effort to coordinate with District officials but does not speak to how it might coordinate with neighboring state wildlife agencies.

Resource allocation:

We asked in scoping comments that the EA address the economics of deer control, stipulate what average annual costs are likely to be in NACE, identify where those resources will come from, and justify costs as providing a greater benefit to resource protection than other programs aimed at the same objectives. This was not done and we strongly recommend that this information be made available to the public.

Conclusion:

We suggested in scoping comments that - - whether or not deer management is to be eventually mandated in NACE - - the current proposal lacked a sufficient basis in science to justify a culling program. The EA as proposed represents to us what seems a forgone conclusion that management should proceed, even under a weakly supported model of population reduction that does not take into account the unique mandate and responsibilities NPS holds, nor the differing conditions in each park under consideration. As we did in scoping comments, we recommend that NPS prepare an Environmental Impact Statement (EIS) and take this opportunity to thoroughly evaluate its existing policies for deer management as well as the record established after more than a decade of this model of intervention.

Respectively submitted,

Anne Lewis, President
John Hadidian, PhD., Scientific Advisor and Member, Board of Directors
City Wildlife, Inc.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 58

Author Information

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Correspondence Information

Status: New
Date Sent: Nov 8, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Nov 8, 2021
Form Letter: No

Correspondence Text

Thank you for addressing the deer overpopulation in the parks east of the river. I live near the Fort Circle Parks trail and see numerous deer in my neighborhood and in my yard. There is no undergrowth in the woods, which has contributed to erosion and loss of tree canopy. There is not enough habitat for the deer population.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 59

Author Information

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Status: New
Date Sent: Nov 8, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Nov 8, 2021
Form Letter: No

Correspondence Text

I support White-Tailed Deer Management at Piscataway Park as an element of a broader Native Habitat Restoration Program. There is presently an over-abundance of white-tailed deer in both public and private portions of the park and it is negatively influencing forest composition. To protect other native species in the park it is essential to pursue activities that bring more balance to the ecosystems and that support healthy forest regeneration.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 60

Author Information

Keep Private: No
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular:

- NPS instructs in the draft Environmental Assessment that an agent must be able to be administered remotely. This has already been demonstrated and published in scientific journals- -thus NPS should update their review to include this standard along with numbers 1 and 4 as already having been met.

I appreciate your thoughtfulness in considering my comment. I hope that NPS will consider a more ethical option to deer culling going forward.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 61

Author Information

Keep Private: No
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

"Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular...

"Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular...

I love these deer and am asking you to consider this. It is very important.

Thank you,
Michele Waldman

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 62

Author Information

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Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

While I am in support of controlling the deer population, I urge you to please revisit the guidelines for evaluating non-lethal methods of control. The criteria that the National Park Service uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular:

NPS instructs in the draft Environmental Assessment that an agent must be able to be administered remotely. This has already been demonstrated and published in scientific journals- -thus NPS should update their review to include this standard along with numbers 1 and 4 as already having been met.

Thank you for your consideration of non-lethal methods of controlling deer.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 63

Author Information

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Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

""Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular...

NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a process that takes more than three years. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

please be more thoughtful in your approach to these problems. Contraception is a longer term and more humane solution. can you provide a cost analysis between culling and contraception? There isnt any information on this.

Benjamin Waldman

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 64

Author Information

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Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies.

In particular: • NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a process that takes more than three years. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

Please don't kill the deer. I walk miles and miles through the parks and never see a deer.

So much hate and anger are in our daily lives-Please don't add to it by killing these beautiful animals. I hope you are better than that.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 65

Author Information

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Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular, NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a short term solution. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. By contrast, sterilization or contraception would provide a long term solution to deer overpopulation.

NPS should do a thorough cost comparison of culling and contraception/sterilization rather than providing the false alternatives of doing nothing or culling the deer presented in the assessment.

An additional concern is that the areas where the killing is slated to occur are close to residential areas. The risk of inadvertently harming people in the area and those who use the parks should be factored into consideration when deciding on an effective, safe and long term approach to managing the deer population in our area.

Thank you for your consideration of these points.

Sincerely,

Ann Phillips

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 66

Author Information

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Correspondence Information

Status: New
Date Sent: Nov 8, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Nov 8, 2021
Form Letter: No

Correspondence Text

We request the National Park Service revisit the guidelines for considering viable contraceptives and include updates to the draft Environmental Assessment. Not only have contraceptives improved since these guidelines were developed, the criteria are at such an unrealistic high bar that they inaccurately represent the real-world potential for contraceptives. In the draft Environmental Assessment, NPS writes that of the five criteria, numbers 1 and 4 are satisfied by current contraceptive technologies. Yet, the determination for the other three criteria have shortcomings that are inherent to the standard or misrepresent the state of technology.

Criterion 2 requires that vaccines have more than three years of efficacy. However, that criteria is not satisfied by NPS' own preferred alternative in the draft Environmental Assessment- -lethal control. An inconsistency is demonstrated because lethal control itself is not effective after 3 years, it requires continuous rounds of culling year after year. The EA describes the proposed alternative as "Quickly reducing the deer population within 5 years". The criteria for contraceptives should be adjusted based on the instance of multiple treatments, in which there is scientific evidence that supports the three year criterion.

Criterion 3 indeed can already be met-it has been demonstrated in McShea et al (1997) in which deer were captured and administered PZP in Front Royal, VA. Thus it is quixotic why NPS has not deemed this requirement satisfied, as they have for criteria 1 and 4. Criterion 3 does not specify limitations-such as whether the capture must be done within specific boundaries, or if there are economic limitations. If the latter, we would welcome an economic comparison of administering contraceptives as compared to lethal control given that sharpshooting requires more visits to be successful on a continuing basis. These unidentified reasons for ruling Criterion 3 as being unsatisfied are further justification for the set of guidelines to be revisited and reevaluated.

Criterion 5 refers to unspecified standards for population control. What threshold is needed for NPS to consider an agent "successful in reducing a free-ranging deer population"? How would it be measured and over what timeframe? NPS should be explicit in what is needed to demonstrate success- -any attempts to be vague appear as a means to bias the results of the EA toward a predetermined preferred alternative.

Given the many inconsistencies of the 5 criteria for non-lethal control and the advancements in the state of contraceptives, a second look at both the criteria and the ability of current agents to meet the guidelines is warranted.

Thank you,

Max Broad
President
DC Voters for Animals - Education Fund

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 67

Author Information

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Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies.

In particular, NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a process that takes more than three years. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 68

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Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies.

NPS instructs in the draft Environmental Assessment that an agent must be able to be administered remotely. This has already been demonstrated and published in scientific journals- -thus NPS should update their review to include this standard along with numbers 1 and 4 as already having been met.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 69

Author Information

Keep Private: No
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I strongly support the No Action Alternative. However, if that option is not selected, I strongly urge the NPS to reconsider its decision to only use lethal means to control the deer. Contraceptives have been proven effective in reducing deer populations. Fencing and repellents are also effective at protecting vegetation yet NPS has rejected that option. Further, NPS needs to address other factors that negatively impact vegetation. Forests are complex ecosystems, and numerous factors affect regeneration. NPS's own studies have identified non-native plants as serious threats, yet NPS has done very little about this. Most significantly, NPS is doing nothing to mitigate damage to vegetation caused by humans. Lastly, killing wildlife conflicts with the Congressional mandate for NPS to conserve and leave unimpaired the wildlife within the parks. Your ongoing deer killing program in Rock Creek Park (8 years and counting) has negatively impacted my ability to enjoy the park. NPS must not be given another carte blanche to kill deer in these additional parks. Eating plants should not be a capital offense. Stop your assault on wildlife and learn to share the planet.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 70

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please stop killing living breathing sentient beings in the name of deer management. Killing an existing life and destroying their families, young ones is not management. Management is making sure they are not born if you want their population to be low. Sighting a deer is a rarity. we have destroyed nature and every animals habitat. That's not okay. There are better ways of managing population then murdering. Birth control. Please look into this and make humane and kind choice. It's inhumane to kill innocent beings.

Please reconsider and I hope you will make kind choices.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 71

Author Information

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I support the No Action alternative.

Years of lethal action have apparently NOT fulfilled the Park Service's objectives.

However, if the Park Service rejects the No Action alternative, I urge the NPS to reconsider its decision to use only lethal means to control the deer. Contraceptives have been proven effective in reducing deer populations. Fencing and repellents are also effective at protecting vegetation. Yet NPS rejects these options. If NPS MUST continue culling deer, it can add a parallel non-lethal practice for comparison.

NPS also needs to address factors besides deer that negatively affect park vegetation. Forests are complex ecosystems, and numerous factors affect their flora. NPS's own studies have identified non-native plants as serious threats to native vegetation, yet NPS has done very little about this threat.

Most significantly, NPS is doing nothing to mitigate damage to vegetation caused by humans (e.g., bushwhacking).

Lastly, killing wildlife conflicts with the Congressional mandate for NPS to conserve and leave unimpaired the wildlife within the parks. Your ongoing deer killing program in Rock Creek Park (8 years and counting) has negatively impacted my ability to enjoy the park. NPS must not be given another carte blanche to kill deer in these additional parks.

In summary, lighten up on the deer and muscle up on invasive plants and the destructive behavior of humans.

Eating plants should not be a capital offense. Stop your assault on wildlife and learn to share the planet.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 72

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Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for evaluating non-lethal control.. The criteria NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular NPS instructs in the draft Environmental Assessment that there must be substantial proof that an agent can reduce a deer population for the agent to be considered viable. This is a vague standard. NPS should establish specific targets and conditions that need to be met to satisfy this criterion. There have been several scientific articles demonstrating successful reductions in deer populations through contraceptives- -NPS should clarify why those do not satisfy this criterion so as to provide a path to viability.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 73

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

To Whom It May Concern,

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular:

NPS instructs in the draft Environmental Assessment that there must be substantial proof that an agent can reduce a deer population for the agent to be considered viable. This is a vague standard. NPS should establish specific targets and conditions that need to be met to satisfy this criterion. There have been several scientific articles demonstrating successful reductions in deer populations through contraceptives- -NPS should clarify why those do not satisfy this criterion so as to provide a path to viability.

Thank you,
Doug Tipperman

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 74

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular:

Shooting deer has been shown to WORSEN deer populations. Hunters kill the strong, healthy bucks allowing sicker and weak bucks to mate with does. A buck keeps a harem of does he will mate with. When it's just him mating there's a lower chance of him impregnating all the does. But when the strong buck is killed by a hunter all the weaker bucks will be able to mate with the does, causing every doe to have sex with multiple bucks ensuring she WILL become pregnant.

Not only does hunting GUARANTEE pregnancy amongst all does, it is immensely cruel. Despite what hunters claim, there's no "instant" death. Deer are found with arrows and bullets hours, days, even weeks after being shot in immense pain but still alive. Reports have shown about half of all deer shot by hunters actually are found and finished off. The other have get away and either die soon after or live for a long time until they are euthanized or saved.

On top of this, many does who are pregnant are shot, suffering greatly as they slowly die with their baby struggling inside of them.

TNR, or using contraceptives, has been shown to not only be effective with feral cats, but deer and other animals as well. It ensures that strong bucks still keep their harems, so only they mate with them. A castrated buck, or who is on a contraceptive, will prevent unaltered bucks from mating with his does ensuring they all don't become pregnant. And keeping does on contraceptives is easier to monitor when they stay in the same herd, rather than being thrown about by various bucks.

Further studies have shown those who participate in hunting have higher domestic violence tendencies

than those who don't. Allowing hunting encourages violence towards humans and other animals.

Hunting also has many accidents. Many hunters are shot by other hunters or their own guns. Children and pets also are victims of being mistaken for the targeted animal.

Hunting is not effective at all. Humans, dogs, and others die. It worsens the population problem and makes future generations sicker, and simply is incredibly cruel.

Yes another issue is transmittable diseases from the deer. While the presence of deer may not transmit a disease, consumption of their flesh does. A growing number of deer are being found carrying COVID-19 in a recent study. Allowing people to hunt and eat these animals will only worsen the current pandemic, or allow a new disease to jump into humans starting yet ANOTHER pandemic.

We should not be encouraging violence towards others that in the end does not resolve the issue, but instead causes many new ones to emerge. There are better options that prevent unnecessary suffering and death to animals and humans alike. Scientists agree that we must end this war on wildlife and ban hunting. Please, listen to the experts, not the bloodthirsty hunters who only want this to satiate their sick blood lust.

Thank you.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 75

Author Information

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Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for considering non-lethal control.

The NPS uses criteria that is outdated and inconsistent with other measures for evaluating viable strategies.

In particular NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years.

However, the preferred approach for NPS- -lethal control- -is a process that takes more than 3 years.

In fact, NPS uses sharpshooting, year after year, in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 76

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Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

NPS instructs in the draft Environmental Assessment that there must be substantial proof that an agent can reduce a deer population for the agent to be considered viable. This is a vague standard. NPS should establish specific targets and conditions that need to be met to satisfy this criterion. There have been several scientific articles demonstrating successful reductions in deer populations through contraceptives- -NPS should clarify why those do not satisfy this criterion so as to provide a path to viability.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 77

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Correspondence Information

Status: New
Date Sent: Nov 8, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Nov 8, 2021
Form Letter: No

Correspondence Text

I strongly support the No Action Alternative. However, if that option is not selected, I strongly urge the NPS to reconsider its decision to only use lethal means to control the deer. Contraceptives have been proven effective in reducing deer populations. Fencing and repellents are also effective at protecting vegetation yet NPS has rejected that option. Further, NPS needs to address other factors that negatively impact vegetation. Forests are complex ecosystems, and numerous factors affect regeneration. NPS's own studies have identified non-native plants as serious threats, yet NPS has done very little about this. Most significantly, NPS is doing nothing to mitigate damage to vegetation caused by humans. Lastly, killing wildlife conflicts with the Congressional mandate for NPS to conserve and leave unimpaired the wildlife within the parks. Your ongoing deer killing program in Rock Creek Park (8 years and counting) has negatively impacted my ability to enjoy the park. NPS must not be given another carte blanche to kill deer in these additional parks. Eating plants should not be a capital offense. Stop your assault on wildlife and learn to share the planet.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 78

Author Information

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Status: New
Date Sent: Nov 8, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Nov 8, 2021
Form Letter: No

Correspondence Text

Opposing to deer population management plan

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 79

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Status: New
Date Sent: Nov 8, 2021
Number of Signatures: 1
Notes:
Park Correspondence Log:
Date Received: Nov 8, 2021
Form Letter: No

Correspondence Text

Please protect our deer and use only non-lethal methods of population control

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 80

Author Information

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular:

NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a process that takes more than three years. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 81

Author Information

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a process that takes more than three years. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 82

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Nov 8, 2021 Date Received: Nov 8, 2021
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular: NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a process that takes more than three years. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

PEPC Project ID: 102432, DocumentID: 115847

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Status: New Park Correspondence Log:
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Correspondence Text

Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular: NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a process that takes more than three years. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 84

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I am opposed to lethal killing of deer,. It is proven to ineffective. Let's use a humane response to control any perceived overpopulation. I suggest birth control.NPS instructs in the draft Environmental Assessment that an agent must be able to be administered remotely. This has already been demonstrated and published in scientific journals- -thus NPS should update their review to include this standard along with numbers 1 and 4 as already having been met.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 85

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Status: New
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Form Letter: No

Correspondence Text

Thank you for managing the deer's population via controlled hunts. I appreciate you humanely reducing the population and know it really benefits the ecosystem!

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 86

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Correspondence Text

NPS instructs in the draft Environmental Assessment that there must be substantial proof that an agent can reduce a deer population for the agent to be considered viable. This is a vague standard. NPS should establish specific targets and conditions that need to be met to satisfy this criterion. There have been several scientific articles demonstrating successful reductions in deer populations through contraceptives- -NPS should clarify why those do not satisfy this criterion so as to provide a

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 87

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Correspondence Text

Dear National Park Service: Please revisit the guidelines for evaluating non-lethal control. The criteria that NPS uses is outdated and inconsistent with other measures for evaluating viable strategies. In particular, NPS instructs in the draft Environmental Assessment that for an agent to be considered viable, it must be effective for 3 years. However, the preferred approach for NPS- -lethal control- -is a process that takes more than three years. Indeed, NPS describes sharpshooting year after year in hopes of reducing the deer population. The standard for contraceptives should be equal with standards for other types of control.

PEPC Project ID: 102432, DocumentID: 115847

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Correspondence Text

I respectfully ask that the NPS reconsider the guidelines for evaluating non-lethal control of the deer in DC and Maryland Parks. The NPS criteria for ruling out contraceptives is out of date and inconsistent with other measures for evaluating viable options.

The NPS preferred approach of lethal control is certainly not something that will last three years. It would need to be done year after year. That goes against the Environmental Assessment draft wherein the NPS states that solutions should be effective for three years to be considered viable.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 89

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Notes:
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Date Received: Nov 8, 2021
Form Letter: No

Correspondence Text

Please pay attention to the community groups have been working on. Why do you have to choose to kill deer rather than use birth control? Your comments do not make sense and it would be most reasonable to explain beyond the superficial reasons that you have offered.

Please reconsider your decisions.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 90

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Status: New Park Correspondence Log:
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Correspondence Text

Please stop the efforts to cull deer and allow them to live. Instead, create places for them to be. Humans are encroaching on wildlife and we are quickly losing wild spaces.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 91

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Status: New Park Correspondence Log:
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Correspondence Text

I wholeheartedly disagree with East Deer management plan. There are more humane ways to keep the deer population low including sterilization. I find it sad that the National Capital Parks does not research alternative ways for humans to live In harmony with our wildlife neighbors. I think my comment will be ignored because, in general, men love to kill, it makes them feel masculine and big, but the truth is men that kill other creatures are themselves the subspecies with no ability to evolve. This policy was enacted 50 years ago and nothing has changed. We are doomed to repeat the same mass murder of wildlife because there is no thought, no creativity, no ability to look for solutions which require more than the lazy man's way of solving problems.

PEPC Project ID: 102432, DocumentID: 115847

Correspondence: 92

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Correspondence Information

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Notes:

Correspondence Text

DJ Schubert
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Email: dj@awionline.org

November 8, 2021
Superintendent
Attn: Deer Management Plan and EA Comments
National Capital Parks
East 1900 Anacostia Drive
SE Washington, DC 20020

Dear Superintendent:

I am pleased to submit comments on the white-tailed deer management plan and environmental assessment (DEA) for National Capital Parks-East (NCPE). I am a wildlife biologist with nearly 40 years of experience working on a variety of wildlife protection and management campaigns including urban/suburban white-tailed deer management issues. I also have vast experience reviewing and providing substantive comments on documents prepared pursuant to the National Environmental Policy Act (NEPA) including DEA's and environmental impact statements (EIS) and have participated in a number of NEPA decision-making processes undertaken by the National Park Service (NPS). Historically, I have submitted substantive comments on NPS and other agency NEPA documents on behalf of one or more non-profit wildlife protection organizations but, in this case, I am submitting these comments as an individual.

Regrettably, these comments are abbreviated as a result of other work commitments and the refusal of

NCPE's Superintendent Morrison to provide a 45-day extension in the comment deadline. In her response to this reasonable request, she failed to even address the merits of extending the deadline preferring, instead, preferring to only address the NPS publication of two conflicting deadlines for public comments on the DEA. Consequently, I formally request that Superintendent Morrison revisit the issue of providing an extension on the comment deadline for this DEA and reopen the comment period for 30 days to facilitate additional input from interested stakeholders.

The refusal of the NPS and Superintendent Morrison to provide extra time for all interested stakeholders to carefully review the DEA in order to prepare substantive comments is indicative of an agency that has hastily assembled a woefully inadequate-both scientifically and legally-DEA for the purpose of authorizing a predetermined outcome of the decision-making process; the lethal control of deer within NCPE. The DEA is so grossly inadequate and superficial that it was clearly prepared to check a legal box in order to expedite planning for the wholesale slaughter of deer on NCPE lands instead of providing the "hard look" at the environmental impacts of the action as required by NEPA.

While it is the obligation, in this case, of the NPS to comply with NEPA (i.e., the burden is not on the commenter to provide the environmental impact analysis required by law), had additional time been provided to compile these comments I would have incorporated additional evidence, including scientific studies, to substantiate the arguments contained herein. Nevertheless, since many of the deficiencies in the DEA are a product of what the NPS failed to include in the DEA, this constitutes a procedural inadequacy of the document.

It is astounding that the NPS has wasted taxpayer dollars working with a consulting company on this DEA given the shoddy work product that has ignored the legal requirements of NEPA, and those contained in the NPS Organic Act, regulations, and management policies. As a consequence, if the NPS intends to comply with the law in this case, it must terminate the DEA process, ensure that the required foundation and management planning documents exist and/or are up-to-date for NCPE and/or all of the individual park units on which the NPS is seeking to kill deer, and then engage in the development of a new, comprehensive deer management plan and EIS. Only through the preparation of an EIS can the NPS provide this proposed action with the level of analysis that it requires and that the public, including those who enjoy using and observing deer in NCPE, deserves.

What Congress intended in promulgating the NPS Organic Act, is that management of national parks should embrace the concept of natural regulation where nature, not man, determines the abundance, distribution, health, and other characteristics of wildlife within the parks and that natural factors dictate the ecology and ecological functions within the parks. In other words, the management of national parks was intended to be different than the more intensive and manipulative management of lands and wildlife on other federal lands and by other federal agencies (e.g., the US Forest Service, the US Fish and Wildlife Service, the Bureau of Land Management, the Department of Defense). Unfortunately, as has occurred in the past, the NPS has significantly lost its way in recent decades electing to promote the manipulation of nature through human actions to accomplish some desired cultural landscape or to achieve a natural landscape that is maintained in a condition that the NPS deems to be appropriate, acceptable, and desirable.

In this case, while I acknowledge that the predators that may have once occupied the NCPE park lands (before extensive human settlement of the Washington, DC region) are no longer present thereby benefiting deer and other species. Instead of embracing deer as a dominant driver in the modified ecosystem, the NPS intends to correct this perceived imbalance using bullets to reset and maintain the deer population at a level believed to be acceptable to promote forest regeneration, vegetation

productivity and diversity, and, in turn, benefit wildlife, including deer. In other words, instead of embracing nature, including the role of humans in modifying and manipulating nature, and managing the parks utilizing that mindset, the NPS intends to kill potentially hundreds of deer over an indefinite period of time to achieve what the NPS believes represents the natural characteristics of its lands. In so doing, the NPS appears unfazed by the suffering that its plan will cause, not only to the deer that will be killed under the cover of darkness while eating bait purposefully used by the NPS to kill but to the residents of Washington, DC and Maryland and all of the visitors to Washington, DC who have enjoyed recreating in the NCPE parks to enjoy the natural beauty of the parks in a highly populated and developed region.

What is particularly perverse in regard to the proposed slaughter of deer on NCPE parks is that, because of the urban/suburban nature of these parks and the manipulation allowed by the NPS, to incentivize public use (including through the creation of open fields of grass for picnics and playing), the NPS has created the ideal deer habitat - woody habitat surrounded by open fields and residential properties. To create ideal deer habitat and then turn around, as the NPS has done, to blame the deer for virtually every ill that has reportedly befallen these parks and to promote their slaughter to ostensibly fix a system broken by the NPS is the height of hypocrisy and double-speak. To even contemplate such a massacre when there are effective alternatives that can reduce the deer population gradually and humanely demonstrates how misguided the NPS has become.

The remainder of this comment letter will provide a brief summary of the many legal and scientific inadequacies contained in the DEA.

The NPS has failed to disclose the legal authority it has to engage in the wholesale slaughter of native wildlife within the park units identified in the DEA:

The NPS cannot engage in the slaughter of wildlife in any park based merely on the alleged adverse impacts of wildlife, in this case, deer on forest regeneration, vegetation characteristics (i.e., productivity, composition, abundance, vigor, and health), other wildlife species, and cultural resources without statutory and regulatory authority to do so. There are only two sections of the NPS Organic Act that the NPS could use to justify the lethal control of potentially hundreds of white-tailed deer on NCPE parks. The first, found at 54 USC §100101, states that "shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." This provision, however, is not applicable in this context because it is applicable to the management of public uses of the parks to prevent their impairment. The second, found at 54 USC §100752, states that "[t]he Secretary may provide for the destruction of such animals and plant life as may be detrimental to the use of any System unit." This provision may be relevant to the situation on the NCPE parks if the NPS has definitive evidence that deer has caused a detrimental impact to public use of the parks (the word "use" in the statute must apply to public use as it is the only logical interpretation of that term in the context that it is used). If Congress hadn't intended for such evidence to be a prerequisite for engaging in the lethal control of a native ungulate then it surely would not have included "detrimental to the use" in the text of the statute (i.e., it could have allowed the destruction of park animals that are detrimental to the system unit).

Not only has the NPS failed to articulate the legal basis for its proposed lethal deer control program in the DEA but it has neglected to provide even any credible evidence, in the form of emailed or written complaints to the NPS or professionally conducted surveys of NCPE visitors attitudes about the park, its

deer, and other wildlife to suggest that deer are detrimental to the use of the NCPE parks. Indeed, the only evidence contained in the DEA even remotely suggesting that deer are detrimental to the public use of the NCPE parks is concern expressed by visitors to Greenbelt Park of high tick densities. Utilizing such evidence to justify the lethal removal of native wildlife would not set a precedent since this is precisely what Grand Canyon National Park did several years ago when planning to remove individual deer that were becoming a danger to humans after becoming habituated to human food handouts. Absent the presentation of evidence that deer have caused a detrimental impact to the public's use of NCPE parks, the NPS does not have the legal authority to implement its preferred alternative. If such evidence does exist but the NPS simply neglected to incorporate it into the DEA, it can't simply ask for a mulligan. Instead, it has to prepare a new DEA (or preferably a DEIS) that incorporates that evidence and provides a fresh, objective examination of the environmental impacts of the proposed action.

The NPS cannot engage in the lethal slaughter of deer on NCPE parks until it has completed the suite of hierarchical planning documents as called for in the NPS management policies:

The NPS relies on a hierarchical planning structure to ensure that management decisions are authorized, appropriate for each park in regards to the park's purpose, and to support decisions made. Like a cinder block wall, each level of the NPS planning structure builds upon the preceding level. Such policies are "guided by and consistent with the Constitution, public laws, Executive proclamations and orders, and regulations and directives from higher authorities" (see <https://www.nps.gov/policy/DOrders/thingstoknow.htm>) and "park superintendents will be held accountable for their and their staff's, adherence to Service-wide policy." NPS Management Policies at 4. General management plans and five-year strategic plans are required by 54 USC §100502 and §100503, respectively.

NPS management policies identify seven different planning levels for each parks; the foundation statement, general management plan, program management plans, strategic plans, implementation plans, annual performance plans, and annual performance reports. NPS Management Policies at 22/23. The current DEA for deer management is considered an implementation plan and, therefore, it must be preceded by a foundation statement, general management plan, program management plans, and strategic plans for the NCPE parks. To be clear, it is not simply a case where the planning documents must be published and in place before an implementation plan can be developed, but the suite of planning documents must provide the authority for the implementation plan - in this case for the slaughter of native deer. In the case of NCPE, in the event that it has authority over the other parks on which deer management is proposed, perhaps those other parks can be included in the required planning documents, including the Foundation Document and General Management Plan, for NCPE.

A search of each of the NCPE parks named in the DEA on the NPS planning website (<https://parkplanning.nps.gov/>) and its separate "management plans" website (<https://parkplanning.nps.gov/ManagementPlans.cfm>), as well as a separate Google search of each park revealed only two of the planning documents required by the NPS management policies. The first was a Foundation Document for NCPE (see Foundation Document Overview, National Capital Parks-East, District of Columbia / Maryland) and the second was a General Management Plan for Anacostia Park Management Plan Environmental Assessment.

A review of the Foundation Document for NCPE reveals that it covers the following park units:

- Piscataway Park, including the Fort Washington Marina and Marshall Hall
- Oxon Cove Park, including Oxon Hill Farm and Oxon Run Parkway
- Harmony Hall

- Mary McLeod Bethune Council House National Historic Site
- Greenbelt Park
- Frederick Douglass National Historic Site
- Fort Washington Park
- Civil War Defenses of Washington
- Baltimore-Washington Parkway
- Carter G. Woodson Home National Historic Site
- Anacostia Park and Kenilworth Park and Aquatic Gardens
- Capitol Hill Parks, including the various U.S. Reservations east of the Capitol and within the L'Enfant Plan for the federal city
- Suitland Parkway and various U.S. Reservations

While the Foundation Document is not dated, based on information found online, I believe it was published in October 1982 making it nearly 40 years old. Its content says virtually nothing about white-tailed deer nor does it indicate that there are any concerns or challenges with management wildlife within the parks. The only reference to white-tailed deer in the entire document is in the description of Greenbelt Park where it is said that:

Its high-quality forests serve as a home to a variety of wildlife, including coyotes, neotropical migrant birds, white-tailed deer, red foxes, woodchucks, opossums, skunks, beavers, chipmunks, and flying squirrels. The park also hosts nesting neotropical forest migrants. Fauna in the park includes mixed pine and deciduous forests, an array of wildflowers, and understory ferns.

This language is hardly reflective of a park that is being decimated by deer. Perhaps this is due to the age of the Foundation Document which cannot be used as an excuse to proceed with the proposed slaughter but, rather, should prompt the NPS to develop a new, up-to-date foundation document.

A review of the Anacostia Park Management Plan finds that "deer" is only mentioned a single time in the nearly 200 page document published in 2017. The single reference to deer merely notes that they are present in the park. That reference is included in a section on "wildlife and wildlife resources" that was identified as a planning issue and concern that was dismissed from further analysis. In another section of the document examining "past, present, and reasonably foreseeable actions," there is no reference to any planned lethal deer control despite the fact that this General Management Plan was only published four years ago. Indeed, there is very little, if anything contained in the plan to suggest that deer in Anacostia Park were of any concern or consequence to forest regeneration, vegetation characteristics, cultural resources, or the public use of the park. Of course, even if such language existed, this Management Plan is limited to Anacostia Park.

At best, the current DEA may be a product of inadequate planning by the NPS and a failure to follow its own management policies since, at a minimum, the NPS must revise and update the NCPE Foundation Document and publish an NCPE General Management Plan, program management plan, and strategic plans before it can even contemplate a deer management plan if it wants to comply with its own management policies. Notably, each of these documents must be prepared in order and must be subject to public review. Some of these documents, including any General Management Plan, must also be subject to NEPA review. Furthermore, assuming the NPS engages in the planning processes, since it has prematurely published the DEA, the current DEA process must be terminated. Then, after the other required planning documents are in place, the NPS must prepare a new DEA or, preferably, a DEIS providing an objective, comprehensive, and fresh examination of the environmental impacts associated with the proposed deer management plan in each of the target parks. Simply put, should the NPS instead

decide to proceed with the current planning effort it will be blatantly violating its own management policies.

The NPS has not considered a reasonable range of alternatives:

NEPA requires agencies to consider a "reasonable range of alternatives." Here, however, the NPS considered a grand total to two alternatives - hardly a range. The two alternatives simply stated are to kill (the NPS preferred alternative) and not to kill (Alternative 1) - hardly a reasonable range of alternatives. It rejected reasonable alternatives such as using strategic fencing to protect sensitive/imperiled plant communities or to employ fertility control - via immunocontraceptives - to humanely reduce deer production rates until, over time, population management objectives are obtained (assuming that there is compelling scientific evidence - which is largely absent from the DEA - suggesting that the deer population in the NCPE parks must be controlled.

While strategic fencing should have been considered as a stand-alone alternative, it also could have - and should have - been considered as part of a more holistic alternative incorporating a variety of management strategies. According the NPS, the use of strategic fencing was jettisoned from consideration in the DEA because it "would not be feasible due to the staff installation and maintenance that would be required to protect the large, forested areas within National Capital Parks - East and due to the potential impacts of placing fencing throughout cultural landscapes." While it is not clear what is meant by "staff installation," none of these excuses hold any water as the NPS, as it has done in other parks, can install such fences preceded by cultural landscape inventories to ensure that fence placement does not harm cultural resources.

The refusal of the NPS to consider immunocontraception as a management alternative - either stand-alone or as a package of management actions - is indicative of an agency that, inexplicably, refuses to consider new, humane, and effective management strategies in favor of the traditional gun and bullet. In other words, if you reportedly have a deer overabundance problem, shoot your way to a solution. The NPS dismisses immunocontraception as a management tool "due to issues related to effectiveness, animal treatment and long-term deleterious behavioral effects, and the cost, staff time, and management that would be required." Not only did the NPS provide no information or analysis to justify its dismissal of immunocontraception as a management strategy but it also failed to explain the origins of the criteria. The NPS created its immunocontraception criteria at an NPS-only meeting and, in my opinion, intentionally designed the criteria to avoid having to utilize a humane strategy to effectively manage deer. Regardless, instead of simply dismissing immunocontraception out of hand for no credible reason, the NPS has entirely failed to conduct any type of substantive analysis of the pros and cons of the different immunocontraceptive agents. While it could have - and should have - consulted with the various scientists actively engaging in the development of new immunocontraceptive agents and/or employing them in the field, including in open deer populations, it has elected to effectively bury its head in the sand. It concedes that there is now one immunocontraceptive agent that satisfies criteria 1 and 4 of its immunocontraception standards, but fails to even identify that agent.

The lack of any meaningful and substantive analysis of the science of immunocontraception, the safety and efficacy of existing vaccines, the development of new vaccines, and the results obtained from employing such vaccines in the field on deer is precisely why, among many other reasons, and EIS is necessary to fully and comprehensively evaluate this technology as an effective tool to humanely manage deer. Furthermore, instead of allowing the "perfect to get in the way of the good," the NPS must revisit its immunocontraceptive criteria through a transparent process involving knowledgeable non-NPS scientists and provide the public with an opportunity to participate in the process to develop less biased

and more up-to-date criteria. The NPS, instead of trying to avoid the use of immunocontraceptives to manage wildlife on its lands, particularly considering that it does and has allowed such vaccines to be used in a handful of parks, it should embrace its potential role as a natural laboratory to advance the study of humane wildlife conflict/impact mitigation tools.

The NPS has not adequately described the affected environment or taken the "hard look" at the environmental impacts of its proposed action as required by NEPA:

NEPA requires agencies to examine the environmental impacts of its actions before implementing those actions. Under NEPA, agencies must "insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken (and) [t]he information must be of high quality." 40 CFR §1500.1(b). Furthermore, "[a]ccurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." *Id.* NEPA requires full disclosure of all relevant information pertaining to the environmental impacts of the actions under consideration. Transparency, not secrecy, is key to the NEPA process. The NPS has grossly failed to even remotely meet those standards in the DEA. Furthermore, the lack of information and analysis in the DEA suggests that this is merely a make-work exercise for the NPS which apparently prefers that interested stakeholders simply trust the agency to responsibly manage the parks, including deer, instead of proving that its proposed action is the best strategy to pursue. The current comment period is too abbreviated to permit a complete assessment of the myriad deficiencies in the DEA. However, examples of some of those deficiencies in regard to information that the NPS has failed to disclose or analyses that the NPS has failed to conduct include:

- The NPS effectively attributes a wide variety of impacts to park vegetation, forests, small mammals, birds, insects, imperiled/sensitive species, and cultural resources/landscapes, and adverse impacts to human health and safety to deer while providing little data to substantiate such claims. Where data is provided, the NPS fails to provide sufficient details to facilitate public understanding and evaluation of the information.

- o For vegetation and forests, the NPS notes that 47 monitoring sites are present within the NCPE parks and provides some data on sapling densities claiming that the low density are attributable to an overabundance of deer. Conversely, despite claiming that deer are devastating park vegetation/forests, the NPS reports that "more plant species have been identified in these park units during vegetation monitoring and surveys than any other park in the National Capital Area," DEA at 14, suggesting that the "deer problem" claimed by the NPS has been overstated. The NPS, however, fails to provide any information about the location of the sampling plots, what methodology was used to select the location of the plots (i.e., random/non-random selection), how and when the plots are sampled, whether there are paired or single plots, whether plots are fenced to prevent deer/wildlife ingress, whether the location of the plot considered the aspect and slope of the landscape, the soil type and health for each plot, and long-term precipitation/temperature data. Similarly, in regard to the reported impacts of lethal deer control on forest species regeneration in other parks, the NPS fails to provide the same information. Furthermore, with the exception of providing minimal sapling density data, the NPS fails to provide any other information about the abundance, composition, health, productivity, and diversity of the plant species found in the sampling plots. It also has failed to even consider, let alone disclose, other factors (other than invasive plants) that may be adversely impacting park vegetation/forests including soil health, precipitation characteristics (i.e., amounts, timing, patterns and how they have changed over time), temperature data, visitor activities, air quality, and plant disease preferring to attribute all impacts to deer. Absent the publication of all relevant information on vegetation/forest sampling, a high quality analysis of such data, and disclosure of other factors that could be impacting vegetation/forests in the NCPE parks, the DEA violates NEPA.

o In regard to the forest/vegetation assemblages identified in the DEA, the NPS reports that two (i.e., Fall-line Terrace Gravel Magnolia Bog plant community and Coastal Plain Oak Floodplain Forest plant community) are known to be adversely impacted by deer. For the remainder, the NPS suggests that they are also susceptible to damage attributable to deer but it provides no evidence to substantiate such claims. The NPS must, using the best available scientific evidence, prove the susceptibility of all such forest/vegetation assemblages to damage caused by deer. Absent such a comprehensive analysis, the DEA violates NEPA.

o The NPS suggests that the alleged overabundance of deer in NCPE parks is causing the spread and proliferation of invasive species. It identifies some of the invasive species found in the NCPE parks in the DEA but fails to provide a comprehensive list of such species, park specific maps of the location of each species, an explanation of the physical, chemical, or other strategies employed by the NPS to control/eradicate such species, or the role of humans in spreading such species - including from residential/industrial properties adjacent to the parks and/or humans transporting the seeds of invasive species into the park on their shoes or clothing. Nor does the NPS disclose other factors, unrelated to deer, which may be causing or contributing to the proliferation of invasive plants in the NCPE parks. Absent disclosure and analysis of that information, the DEA violates NEPA.

o The NPS claims that the overabundance of deer in NCPE is adversely impacting the habitat of small mammals and the small mammal species themselves. With the exception of identifying white-footed mice as a prominent small mammal species in the NCPE parks, the NPS does not identify what other small mammal species are found in the parks. Nor does it provide any evidence, including population demographic data, to demonstrate that any small mammal species is declining as a result of deer. Similarly, it fails to disclose the presence of any other threats that may be impacting small mammals including the presence of predators (particularly non-native predators including feral cats and dogs), disease, and/or habitat loss attributable to both natural occurring and anthropogenic factors. Instead the NPS relies entirely on speculation to "prove" that such damage is occurring. Unless the NPS publishes information about the small mammals found in the NCPE parks including population demographic data documenting the estimated abundance estimates for each species over time, the DEA violates NEPA.

o The NPS notes that 243 bird species have been found in the NCPE parks. While identifying some of the bird species, just as with small mammals, the NPS has failed to provide any estimated population abundances or demographic data for any of the bird species in NCPE parks. Of all of the birds species identified in the parks, the NPS claims that the ovenbird and eastern towhee have been harmed by deer but fail to provide any actual data to prove this assertion. Nor has the NPS provided any explanation of other threats that may be impacting birds and their habitats in NCPE parks including the direct and indirect impact of climate change, visitor activities, park service management activities, invasive plant and animals (including feral cats), disease, or, for migratory species, any of the myriad threats that may be adversely impacting the species along their migratory routes.

o The NPS claims that deer adversely affect insects in the NCPE parks which, in turn, negatively impacts birds and other wildlife that rely on insects as food. The NPS provides absolutely no proof that insect populations have declined in NCPE parks or that deer have caused such reported declines. Absent the presentation of such data, the NPS must remove such claims from the DEA. Should such claims be retained without proof, the DEA will violate NEPA.

o The NPS identifies several imperiled/sensitive species found in NCPE parks and suggests, without any data or proof, that deer adversely impact these species. I am not suggesting that deer may not impact such species but the NPS must provide proof of such harm - instead of simply speculating as to what impacts may occur.

o The NPS identifies the presence of a number of cultural resources/landscapes in each of the NCPE parks based on cultural resources surveys. The NPS appears convince that it has a legal mandate to preserve such cultural resources/landscapes to reflect a specific time period or appearance when, in fact, no such mandate exists. While the NPS may prefer to protect certain "snapshots in time," this is a

difficult undertaking given nature's desire for succession. Indeed, attempting to maintain such landscapes, features, or appearances can often result in greater environmental impacts than permitting natural succession to proceed. Indeed, there are other ways to tell the story of historically or culturally important lands and landscapes including through film, photographs, public displays, educational curricula, and through the information/stories communicated by NPS naturalists to park visitors. The NPS should have made the cultural resource surveys available to the public and provided a far more detailed analysis, based on credible data and not speculation, as the impact of deer on cultural resources/landscapes in NCPE parks.

o The NPS claims that deer adversely impact human health and safety as hosts for ticks and due to deer-vehicle collisions. While the NPS admits that other wildlife species harbor ticks, its analysis of the role deer in contributing to the transmission of tick related illness is much more complex than reported by the NPS and it entirely fails to even begin to capture that complexity in its summary. While the NPS claims that the public and park staff have reported high tick abundance in Greenbelt and Piscataway Parks, it provides no data on tick densities or on cases of tick diseases in humans visiting or living near those parks, or any discussion of the efforts it undertakes to educate park visitors and neighbors about ticks and how to protect themselves from tick borne diseases. Instead, it expects the public to believe its claims absent any credible proof. As to deer-vehicle collisions, there is no question that they occur, but the NPS, again, fails to provide any data on such accidents in or adjacent to NCPE parks, the severity of such collisions, whether any humans were harmed or died as a result, and the monetary damages accrued. Nor does the NPS disclose what, if any actions it has employed, to reduce such accidents including by installing permanent/temporary warning signs, establish slower speed zone in known collision hotspots, or by educating drivers as to the steps they can take to reduce the likelihood of such accidents.

- The NPS indicates that it and other agencies conduct deer population surveys in some of the NCPE parks and that deer population densities exceed that density that the NPS claims is necessary to protect park vegetation, promote forest regeneration, and mitigate impacts to cultural resources/landscapes. The NPS discloses limited deer population data for Greenbelt, Piscataway, Fort Washington, and Anacostia Park but it fails to actually disclose all relevant data collected over the years from these and any other parks within NCPE. Based on what is disclosed, it appears that the NPS has no deer abundance data for many of the parks where the NPS has proposed to engage in lethal deer control. Of the data that is disclosed, deer densities have declined significantly since 2010 in Greenbelt and Fort Washington Parks yet the NPS neither admits to such a reduction in density or explains what factors may be contributing to the decline. In addition, other than indicating that it uses spotlight surveys, distance sampling, and wildlife cameras to estimate deer abundance/density, the NPS fails to explain the methodologies used in conducting the counts. Information about where the surveys are conducted, when, by whom, whether and how the NPS extrapolates collected data to develop park-specific density estimates, what assumptions underlie the interpretation or calculation of the abundance data, and if the NPS uses any type of double-count system to ensure the accuracy of the collected data. Without such information it is impossible to assess the suitability of the deer abundance methodology being used or to determine the accuracy of the resulting data. Such information, including all deer population abundance estimate data collected over time in the NCPE parks, must be disclosed and objectively analyzed in order for the NPS to comply with NEPA.

- Considering that the NPS must demonstrate that deer are detrimental to the public use of the NCPE parks in order to have the legal authority to implement its planned deer slaughter, the NPS should have disclosed visitor use data for each of the NCPE parks as well as any surveys done (by the NPS or third parties) to assess visitor use and enjoyment of the parks. Other parks have conducted such surveys to obtain a profile of park visitors, what parks attractions were visited, the money spend for the visit, and to determine what they liked (and didn't like) from their visit. If such surveys/data exist for NCPE parks, the NPS was obligated to disclose it and analyze it particularly in regard to visitor perceptions of deer in

the parks. If such data does not exist, the NPS should collect it to improve park management.

- The literature cited in the DEA reveals the inadequacy of the document and lack of transparency by the NPS. Of the approximately 40 documents cited in DEA, only four were published in the peer-reviewed literature and the NPS provided a URL to access only five of the document. The Bates (2018) deer report, which the NPS extensively cites to support many of its claims, could not be found online preventing a review of the report, its methodologies, and conclusions. The public must be provided access to the evidence that the NPS relies on to substantiate its claims. In this case, if the documents are available online, the NPS should have created a website where the public could access the document. Such secrecy in a NEPA document is not consistent with the intent of NEPA.

The NPS has failed to adequately consider the cumulative impact of its actions:

NEPA requires federal agencies to consider the cumulative impacts of their actions. "Cumulative impacts" is defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 CFR §1508.27. The DEA contains no assessment of the cumulative impacts of the proposed lethal deer management plan and, therefore, violates NEPA.

The NPS must prepare an EIS:

The regulations implementing NEPA contain ten significance factors that agencies are required to consider in determining if an action requires analysis in the EIS. In this case, the proposed action satisfies XX of the ten factors; satisfying even one warrants the preparation of the EIS. In this case, the action meets or exceeds the following significance factors:

- (1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.
- (3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.
- (4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.
- (5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.
- (6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.
- (7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.
- (8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

Conclusion:

For the reasons articulated in this letter, the NPS has no choice but to terminate the DEA and current planning process. The NPS has failed to identify the legal authority under which it claims it can conduct a wholesale slaughter of deer within the NCPE parks and it has ignored its own management policies in failing to engage in the hierarchical planning process to provide the requisite foundation for the proposed

lethal deer management plan. Furthermore, it has grossly failed to comply with NEPA as the DEA does not contain anywhere near the level of analysis required in such a document. Fundamentally, and EIS is not only clearly required for this action but it will lead to a more informed decision if the analysis is comprehensive and unbiased.

Thank you in advance for considering this comment letter and please add me to your electronic distribution list so that I may have an opportunity to participate in the development of the various planning documents, including a revised Foundation Document and General Management Plan for all of the parks managed by NCPE.

Sincerely,

DJ Schubert
Wildlife Biologist

PEPC Project ID: 102432, DocumentID: 115847

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Scientists have long had consensus that many if not most animals are sentient, conscious and self aware.

"In 2012, a group of neuroscientists signed the Cambridge Declaration on Consciousness, which "unequivocally" asserted that "humans are not unique in possessing the neurological substrates that generate consciousness. Non-human animals, including all mammals and birds, and many other creatures, including octopuses, also possess these neural substrates." "

Link for citation:

https://en.m.wikipedia.org/wiki/Animal_consciousness#Cambridge_Declaration_on_Consciousness

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I urge you to PLEASE consider alternatives to killing the deer. I am not a scientist. I am a lover of nature, of parks, of animals. The deer are one of the best things about Rock Creek Park. Contraceptives are a better, more humane alternative. They should be given the time to work. Thank you.

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This document is filled with lies and was clearly a slapdash effort to take old data from previous lies told about Rock Creek Park deer control and use it in the new killing effort at NCP-E. Reprehensible.

1. There is no Chronic Wasting Disease among the deer and to suggest there is, is irresponsible. The mere mention puts the idea in people's heads but it's not true. NPS seeks to confuse and misinform the public.
2. "No effective reproductive control agents are available that meet NPS-established criteria." What a lie. NPS deliberately establishes criteria that excludes reasonable and effective solutions. There are fertility control methods that can be used that are effective and most importantly humane, that don't destabilize a population.
3. The tick population is actually worse if you kill the deer. The deer help reduce the tick population by ingesting them. The ticks remain on mice and birds and are transmitted that way, not through the deer. To suggest otherwise is misrepresentation and lying to the public.
4. There is no proof deer are "degrading vegetation and the habitats of other native wildlife." Where is the proof that deer "overbrowsing" is causing "unsustainable degradation of the parks' forests and natural resources"? The National Park Service and Rock Creek Park Management have lied about this for years in Rock Creek Park. This is exactly what they're doing in National Capital Parks - East too.
5. Where is the proof that "Deer overabundance is affecting forest regeneration at National Capital Parks - East and is compromising efforts to restore the abundance, distribution, structure, and composition of native plant communities."

The National Park Service has not established a need to kill deer in any park in DC or MD. NPS has

offered no scientific evidence deer are killing seedlings in any parks. The Park Service is well aware that reports have shown that invasive plants are doing the damage in Rock Creek Park, and in all the parks for the last 30 years, not the native deer. Invasive plants are causing all the tree regeneration and seedling problems, not the deer. This is true in the entire National Capital Parks East region.

Killing deer has only increased the population. This increase will now happen across the DC and MD region if NPS begins killing deer in all of these parks. What a disgusting display of ignorance.

NPS refuses to consider non-lethal alternatives even after creating population increases because of the "rebound effect."

Rock Creek Park is a perfect example of how NPS has lied about what's happened there. NPS falsely claims that killing native deer in Rock Creek Park will "protect and restore native plants and promote healthy and diverse forests." Yet the agency has **no** scientific evidence white-tailed deer are the principal cause of any decline in forest regeneration in Rock Creek Park. Instead, NPS has a multitude of evidence, cited in reports from 1996, 2000, 2004, 2005 and 2008, the real culprit for any decline in native vegetation is the pervasive presence of aggressive, non-native plant species that have invaded the park from neighboring properties, and are overgrowing and choking out the natural forest. In fact, for decades, invasive plants, not deer, have been the single most significant threat to the Park and to the forest as a whole.

This is true in the National Capital Parks - East areas as well. Where is the proof that killing deer does anything to improve the situation. Removing the invasive plants is the solution, not removing the deer!

In 2013 when NPS began killing deer for the first time in Rock Creek Park's 123-year history, the population of about 300 had been stable for at least ten years. The deer were not in crisis. If this population had needed any reduction, the only effective way to do so was to have used a non-violent, safe, cost-effective, immunocontraception fertility control vaccine or contraceptive agent that NPS had used successfully in other parts of the country on deer, horses and elk.

Instead, NPS went against the advice of humane officials, wildlife biologists, wildlife fertility experts and the public, to needlessly kill hundreds of deer in the Park and thus begin the process of destabilizing the population. Nine years later, healthy, disease-free deer are born in the spring, only to be killed in the fall and winter. In fact, more deer are born and killed in Rock Creek Park than ever before. This will also happen in every single NCP-E park they want to kill deer in if this plan to kill across the DC and MD region is approved.

Without lethal interference, deer populations are self-regulating and stable, as Rock Creek Park's was for decades. But when large numbers are suddenly killed year after year, "the rebound effect" kicks in, causing the remaining deer to produce twins at a younger age due to the enhanced food supply. This increases the birth rate and the population. Deer from neighboring communities also move into areas that open up after deer are killed. By increasing the killing of deer, NCP - E will be creating an overpopulation problem and destabilizing the population of deer.

Instead of reducing the deer population, killing actually increases and destabilizes it. For example, density surveys in the fall of 2016 in Rock Creek Park determined there were 19 deer per square mile in the Park - a goal NPS had set for itself after three years of killing. But instead of moving to non-lethal management as it said it would, NPS continued killing, and a year later in 2017, surveys determined density had nearly tripled to 55 deer per square mile.

I am one of several people affiliated with the organization "Save the Rock Creek Park Deer" who successfully sued the US Geological Survey and the US Department of Interior to obtain the 2015 updated Draft and Final Reports for the study on which NPS based its decision to kill the deer: "Impacts of Deer Herbivory on Vegetation in Rock Creek Park, 2001-2014" by Krafft & Hatfield. We began asking for the information in 2016, filed suit for it in 2017, and in May 2018 finally received the reports after the government relented and produced them. **Not surprisingly, the scientific results the government went to such great lengths to hide confirmed that deer were *not* interfering with forest regeneration in the Park. Thus the National Park Service's stated reason for killing deer had evaporated.

The studies compared plots to which deer had access, to similar plots from which they were excluded. The study concluded: The "stocking rate [for native vegetation] did not show any significant differences between fenced and unfenced plots." Simply put, the deer were *not* having an effect on forest regeneration in the Park despite what NPS has said and continues to say.

Dr. Oswald J. Schmitz came to this same conclusion in 2013. He's the Director of Yale University's Institute for Biospheric Studies and an expert on white-tailed deer in forest ecosystems. He has studied their impact on vegetation and forest regeneration, and concluded after thoroughly reviewing the earlier two studies relied upon by NPS to justify the killing: "There is no evidence presented that deer are impairing the forest regeneration in Rock Creek Park or that deer are facilitating the rise of invasive non-native vegetation" - two principal reasons cited by the Park Service as a basis for killing the deer. "Although the 2009 Hatfield study demonstrated changes in vegetation in Rock Creek Park over time, it did not show that deer had any negative effect on plant abundance or diversity or on forest regeneration."

He added: "Significantly, the 2011 Krafft & Hatfield study provides no evidence the Park would function differently if deer populations are reduced, or that the minute changes that have been observed between fenced and unfenced plots would in any way diminish the value of wildlife habitat. The study does not show that deer are having any impact on upland deciduous forests or riparian deciduous forests, or that their presence is affecting rare plant communities, or that deer are disturbing deciduous forests on slopes. Nor do any of the data demonstrate that deer are converting upland or riparian areas to or from vegetation types dominated by invasive or non-native species. Whether deer are present or not, these non-native species will continue to flourish in this park unless they are managed by some other means. The site-specific data here show that deer are not damaging the plant resources of Rock Creek Park."

So instead of focusing on the massive, documented problem of invasive plants in the Park, NPS instead began killing deer in 2013 - - without scientific evidence of any problem - - and has now destabilized the population. Meanwhile, exotic, invasive plant species have continued to flourish uncontrollably in the Park and damage native plant regeneration year after year, while NPS does little more than supervise volunteers who physically remove the plants.

It is time for Congress to investigate the environmental impact of the nine-year deer killing operation in Rock Creek National Park, the destabilization of the Park's deer population, the decades-old invasive species problem there, NPS's refusal to consider non-lethal management as it said it would and NPS's refusal to conduct a required supplemental National Environmental Policy Act (NEPA) review in the face of overwhelming evidence that exotic and invasive plant species - - not the native deer - - appear to be the real cause of any decline in forest regeneration.

NPS: Where is the proof that killing deer does anything to help restore native species to any park? The burden is on your agency to show scientific evidence that killing deer does anything but destabilize the

population and create a rebound effect.

STOP KILLING DEER IN ROCK CREEK PARK and NCP-E.

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We appreciate the opportunity to provide comments on the National Capital Parks- East Deer Management Plan / Environmental Assessment, a plan that when implemented will guide NPSs management approach to 20 or more units of this park region for an expected period of 20 years or more.

Our mission at the Humane Society of the United States is to better engage federal land managers to find humane and effective solutions to complex wildlife conflicts. We agree that seedling regeneration within the park system is essential to natural communities which in turn provides valuable habitats for native species. And we agree that it is both critical and required by NPS management policies that natural resources be protected.

However, it is our view that the EA / Deer Management Plan and its proposed actions are missing important considerations, data and information that will mislead park managers to only consider lethal actions. This plan, once implemented, will remain in effect for 20 years- a significant period of time for the application of this lethal-only management approach. Further, the plan provides no interval for evaluation, assessment or reconsideration based on goal or goals achieved that might include population reduction milestones, seedling regeneration, or the disclosure or revelation of additional non-lethal ways to reduce stressor impacts to seedling regrowth. And since this plan is predisposed to a narrow view of factors leading to outcomes that will include unnecessary killing, the plan significantly excludes the public's wishes for non-lethal management approaches to conflicts with wildlife within our national parks.

We believe that this plan will also obstruct the development of a comprehensive management strategy that supports long-term protection, preservation, and restoration of native plant and cultural landscapes throughout these park units. We urge that a more comprehensive and robust accounting for the factors that affect seedling regeneration be conducted, and that assumption that deer are overabundant in the

whole park region also be supported by data and analysis that is accessible and available to all stakeholders. In the plan, only a binary view and plant-browse relationship is presented, and it excludes the impact of habitat fragmentation, changing climate, anthropogenic factors as well as impacts from other species that browse. We urge that at a minimum, the broad assumption that deer are the primary factor impacting seedling regeneration as well as the only factor that can be managed or mitigated be supported. These broad assumptions are made in the absence of analyses of these varied range of park resources that consist of natural areas, trails both marked and unmarked, recreation areas, cultural landscapes, historic homes, parkways, farms, archaeological sites, historic forts, environmental clean-up sites and scenic easements.

These park units not only differ from one another in many ways, but they also engage a broad spectrum of the public. Due to the complexity of the many park units and the comprehensive analysis that must be conducted in order to understand these systems and how they relate to the presence of deer we believe that this EA is insufficient in its analysis.

An additional concern is regarding the reference material on which a number of assertions are predicated including overabundance, seedling browse, and importantly, population estimates of deer in the national park region. The 2018 National Capital Region Deer Report to DOEE by Bates, Scott does not seem to be readily available for review on DOEE or NPS websites. During the scoping phase it was stated that this and other data and information from population reduction and assessments in other park units would be shared and made available prior to the EA. We would also request the inclusion and consideration of any peer-review public, reports, summary of monitoring having identified the need for action and any other efforts, or other data and documentation that would help clarify the justification, objectives and status of the proposed deer management program.

Deer are a native species whose continuance the National Park Service (NPS) is also mandated to ensure, consistent with the General Principles for Managing Biological Resources articulated in NPS Management Policies (2006) and pursuant to the Services Organic Act of 1916. We appreciate the challenges faced in managing deer-plant relationships in these park units, but in order to justify lethal control approaches the following questions must be considered and endeavored to be answered in order to appropriately inform the development of the proposed management plan (and remain only partially or wholly unanswered by the EA):

" How will NPS measure deer density each year and how will this method(s) be applied to the park units that differ considerably from one another in size, vegetative makeup and use.

" What type of data collection and analysis has NPS produced related to the Rock Creek Park case study and Catocin Mountain Park case study? Or any of the park units where management actions are taking place including Antietam National Battlefield, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Monocacy National Battlefield or Manassas National Battlefield Park. Where can these data sets be found?

" How can the public know that lethal management and removal of deer from other parks are relevant to the conditions that exist in the National Parks-East units? Any data, study, or other evidence used to claim that deer are causing one or more impacts any of these park units should be from studies conducted within those units.

" What is the plan to provide data or make it accessible to the public from case studies along with any related analysis used to support the proposed deer management approach (and ongoing management) in these park units and when and in what form will it be available to the public?

" What will the target for satisfying the parks management objective be in each park or unit? Will it be a certain deer density, a certain level of vegetative recovery (and or a certain species mix) or something

else?

" How often will the objective population target be assessed and evaluated for each park unit? And how and when will it be established? For instance, will there be population estimates done each year in each park unit? What method will be used and where will this information be published or posted?

" Will or has the park been engaged in any research activities to evaluate the population reduction effort in any of the parks cited in the EA as evidence for deer population reduction via lethal control? And if so, have there been publications in peer-review journals or other places that you can direct the public to so that they can better understand how population reduction methods are implemented and evaluated by the NPS?

Aside from lacking sufficient information to justify the broad application of lethal control across these 20 park units, it is our view that this EA and planning process is lacking in the presentation of information and consideration of the technologies and methodologies related to non-lethal approaches. That includes current research that is available and emerging in terms of fertility control technologies as well as silviculture management that includes strategic planting efforts, fencing, and other non-lethal tactics to address any legitimate plant or forest regeneration management concern.

If the science dictates that the deer must be managed in terms of population control and management is to be consistent with NPS statutes, regulations, and policies, then the management actions should utilize humane, non-lethal means. We do not agree with NPS's statement that there are no non-lethal deer management population control methods that are effective in an open, free-ranging population. That is not an accurate statement. There has been and there is emerging evidence that immunocontraception can be effective in reducing population in open systems and NPS should consider this non-lethal option. At the very least a pilot program to better understand these technologies and the implementation of them is warranted to trial within the agency. But this control action should be justified in the same way that we have called for lethal control actions to be justified - through the process of collecting baseline data regarding impact for each park unit and setting achievable goals for a program that can be monitored and evaluated for success on an ongoing basis.

This EA notes the NPS determined criteria of reproductive control and it also states that NPS would review the status of ongoing reproductive control research on a periodic basis through consultation with subject matter experts and review of new publications. How, when and to what extent is this occurring? What process is in place for this review and what information can be supplied regarding that consultation?

Resistance to implementation of fertility control technology seems to be a dominant position within the NPS. Investigation of the research, establishment of a pilot project, development of delivery infrastructure, training of staff and understanding and even innovation in application has been resisted. Many of the remarks in the scoping presentation and in the EA regarding approaches to fertility control were missing additional context and information. Furthermore, the NPS criteria describing the threshold needed to utilize a fertility control method are not also applied to lethal control programs. In the past, NPS has actively opposed fertility control of deer in highly urbanized areas like Rock Creek Park in Washington DC and consistently resisted integration of this technology into wildlife management approaches within park systems. This position needs to be reconsidered.

The efficacy and remote delivery of immunocontraceptives have been demonstrated in deer in both closed and open systems. The capacity of native PZP and PZP-22 to stabilize and reduce white-tailed deer populations in some suburban environments has been well established (Rutberg and Naugle 2008; Rutberg et al. 2013), and active research taken on by scientists aimed at increasing the practical use of

PZP and PZP-22 as part of a fertility control program are underway.

These vaccines have proved to be a successful contraceptive in wildlife and have other desirable attributes: (1) they prevent pregnancy an average of 90% of the time in treated animals, (2) they can be delivered remotely by dart, (3) the contraceptive effects are reversible, (4) they are effective across many species, (5) there are no debilitating health side-effects even after long-term use, (6) they have almost no effect on social behaviors, (7) the vaccine cannot pass through the food chain (it is safe to consume treated animals that have been harvested) and (8) they are safe to give to pregnant animals.

The PZP vaccine has been shown to be an effective contraceptive management tool on island populations of white-tailed deer as early as 1990. Since that time, numerous projects have been mounted with both island populations and open systems in MD, NJ, NY, CT, WA, VA, SC and OH. The two largest long-term deer fertility control research projects involving the use of immunocontraceptives were on Fire Island National Seashore (FINS), NY, where a project was begun in 1993 and extended through 2009 and on the campus of the National Institute of Standards and Technology (NIST) in MD, where immunocontraceptive treatment of deer began in 1994 and continued for 20 years. In both these programs the deer population was decreased significantly.

On behalf of the HSUS, we appreciate your consideration of our comments and would be happy to provide additional information or input into the process of developing a more comprehensive and humane management approach.

Respectfully submitted,

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Correspondence Text

Hi,

I am writing to request that you cease lethal population control of deer, as it is both cruel and ineffective. It is cruel in that quick kills are rare, and many animals suffer to death over long periods of time, when hunters severely injure them, without killing them. It is ineffective for a variety of reasons. One reason is that even if the number of deer is lowered temporarily, it will quickly bounce back. This is a result of what is known as "compensatory rebound", where more twins and triplets are born. The sudden reduction in population causes more food and resources to be available, thereby increasing the birth rate.

Please consider other methods, such as immunocontraception, which is much more effective and humane. Several scientific articles have demonstrated successful reductions in deer populations through contraceptives.

Thank you,
Moshe Eckmann

ATTACHMENT C: AGENCY CONSULTATION DOCUMENTATION



REPLY REFER TO:
I.A.2. (NCA-NACE)

United States Department of the Interior

National Capital Parks-East
NATIONAL PARK SERVICE
Interior Region 1- National Capital Area
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

April 27, 2021

Mr. David Maloney
State Historic Preservation Officer
Historic Preservation Office
D.C. Office of Planning
1100 4th Street, S.W., Suite E650
Washington, D.C. 20024

Dear Mr. Maloney:

National Capital Parks-East (NACE), an administrative unit of the National Park Service (NPS), proposes to develop a Deer Management Plan for various parks in Washington, DC, as well as Prince George's and Charles Counties in Maryland. NACE is writing to formally initiate consultation with both the District of Columbia State Historic Preservation Office (DC SHPO) and the Maryland Historical Trust (MD SHPO) in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR § 800). The NACE parks being considered as implementation areas for the management plan include the following located within Washington, D.C.:

- Anacostia Park and Kenilworth Park and Aquatic Gardens
- Civil War Defenses of Washington Parks: Fort Mahan, Fort Dupont, Fort Davis, Fort Chaplin, Fort Stanton, Fort Ricketts, Fort Greble, Battery Carroll, and Shepherd Parkway

Proposed implementation areas include the following NACE parks located within Maryland:

- Fort Washington Park
- Civil War Defenses of Washington Parks: Fort Foote
- Piscataway Park, including Marshall Hall
- Oxon Cove Park, including Oxon Hill Farm and Oxon Run Parkway
- Harmony Hall
- Greenbelt Park
- Baltimore-Washington Parkway
- Suitland Parkway

INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS,
NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, VERMONT,
VIRGINIA, WEST VIRGINIA

USGS topographic maps of the above parks are attached to this letter as Figures 1 through 6. More detailed maps of the parks are provided as Figures 7 through 23.

An overabundance of deer in these parks is negatively impacting various natural and cultural resources. The grazing is detrimental to environmental factors including vegetation, habitats of other terrestrial wildlife, and public health and safety. Over browsing is causing degradation of natural resources that are important character-defining elements of the cultural landscapes of NACE. Landscape degradation from the overpopulation of deer can also affect character-defining features of historic districts with NACE. The Deer Management Plan seeks to minimize these impacts to natural and cultural resources.

The proposed action includes the continuation of current management activities such as deer population density surveys, the use of forest health survey plots to assess the effects of over browsing, and surveillance and sampling for chronic wasting disease. In addition, the proposed action includes using lethal deer management controls, in the form of culling, to reduce the deer population to an acceptable level, ensuring that the deer population becomes a balanced component of a functioning ecosystem with the primary goal of restoring vegetation, including cultural landscapes, within the identified implementation areas. Currently, the NPS is not aware of effective non-lethal deer management controls that would control the free-ranging deer populations at NACE. The NPS would consider implementing non-lethal controls in the future that are deemed effective and feasible in combination with lethal controls or as part of a deer population density maintenance strategy.

The number of deer to be removed annually will be based on recent population surveys and the Plan will strive for a deer density goal of 15 to 20 deer per square mile. It is estimated that the desired deer density goal could be reached at NACE in approximately 5 years, though the timeframe would likely vary depending on the implementation areas. Removal could proceed more rapidly based on factors such as removal and population regeneration rates.

To prepare for the Section 106 consultation process, NACE has prepared maps of the parks identified as proposed deer management plan implementation areas depicting the draft Areas of Potential Effect (APE) for each park (see Figures 7 through 23). The draft APE for both direct and indirect effects are limited to the boundaries of each park. A preliminary list of historic resources within the draft APE organized by park is enclosed in this letter. NACE will work with the DC SHPO, the MD SHPO, and other consulting parties to finalize a formal determination of effect through the Section 106 consultation process. NACE has also developed the enclosed list of potential consulting parties.

In accordance with the National Environmental Policy Act (NEPA), NACE will prepare an Environmental Assessment (EA) to document the analysis of potential impacts of the proposed Deer Management Plan. NACE plans to coordinate the Section 106 and NEPA processes per the implementing regulations (36 CFR § 800.8) of the NHPA. NACE will also develop an Assessment of Effect for this project as a separate, but parallel, process to the EA.

We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, please contact Michael Commisso, Chief of Resource Management, at michael_commisso@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara D. Morrison".

Tara D. Morrison
Superintendent

Enclosures:

Deer Management Plan Implementation Area Maps (Figures 1-23)

Preliminary Inventory of Historic Properties

List of Potential Consulting Parties

cc:

Andrew Lewis, DC SHPO

Dr. Ruth Trocolli, DC SHPO

Tammy Stidham, NPS, NCA

Michael Commisso, NPS, NACE

Joel Gorder, NPS, NCA



DC STATE HISTORIC PRESERVATION OFFICE FEDERAL AGENCY SECTION 106 REVIEW FORM

TO: Daniel Weldon, NPS, National Capital Parks-East

ADDRESS: Via email to: daniel_weldon@nps.gov

PROJECT NAME/DESCRIPTION: Implementation of the White-Tailed Deer Management Plan

PROJECT ADDRESS/LOCATION DESCRIPTION: National Capital Parks-East

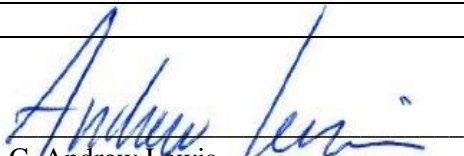
DC SHPO PROJECT NUMBER: 21-0491

The DC State Historic Preservation Office (DC SHPO) has reviewed the above-referenced federal undertaking(s) in accordance with Section 106 of the National Historic Preservation Act and has determined:

<input type="checkbox"/>	This project will have no effect on historic properties. No further DC SHPO review or comment will be necessary.
<input type="checkbox"/>	There are no historic properties that will be affected by this project. No further DC SHPO review or comment will be necessary.
<input checked="" type="checkbox"/>	This project will have no adverse effect on historic properties. No further DC SHPO review or comment will be necessary.
<input type="checkbox"/>	This project will have no adverse effect on historic properties conditioned upon fulfillment of the measures stipulated below.
<input type="checkbox"/>	Other Comments / Additional Comments (see below):

We have reviewed the Assessment of Effects report for the above-referenced undertaking, which we received on September 16, 2021, and understand that the NPS proposes to use lethal methods (i.e. sharpshooters) to reduce the deer population within NACE parks to a level that will avoid grazing-related damage to trees and other plants. None of the proposed management methods will directly alter historic fabric. Effects will be temporary and indirect. Therefore, we concur with the NPS determination that this undertaking will have "no adverse effect" on historic properties.

BY:


C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

DATE: October 4, 2021



United States Department of the Interior

National Capital Parks-East
NATIONAL PARK SERVICE
Interior Region 1- National Capital Area
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

IN REPLY REFER TO:
I.A.2. (NCA-NACE)

April 27, 2021

Ms. Elizabeth Hughes
Director/ State Historic Preservation Officer
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, Maryland 21032-2023

Dear Ms. Hughes:

National Capital Parks-East (NACE), an administrative unit of the National Park Service (NPS), proposes to develop a Deer Management Plan for various parks in Washington, DC, as well as Prince George's and Charles Counties in Maryland. NACE is writing to formally initiate consultation with both the Maryland Historical Trust (MD SHPO) and the District of Columbia State Historic Preservation Office (DC SHPO) in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR § 800). The NACE parks being considered as implementation areas for the management plan include the following located within Washington, D.C.:

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INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

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The proposed action includes the continuation of current management activities such as deer population density surveys, the use of forest health survey plots to assess the effects of over browsing, and surveillance and sampling for chronic wasting disease. In addition, the proposed action includes using lethal deer management controls, in the form of culling, to reduce the deer population to an acceptable level, ensuring that the deer population becomes a balanced component of a functioning ecosystem with the primary goal of restoring vegetation, including cultural landscapes, within the identified implementation areas. Currently, the NPS is not aware of effective non-lethal deer management controls that would control the free-ranging deer populations at NACE. The NPS would consider implementing non-lethal controls in the future that are deemed effective and feasible in combination with lethal controls or as part of a deer population density maintenance strategy.

The number of deer to be removed annually will be based on recent population surveys and the Plan will strive for a deer density goal of 15 to 20 deer per square mile. It is estimated that the desired deer density goal could be reached at NACE in approximately 5 years, though the timeframe would likely vary depending on the implementation areas. Removal could proceed more rapidly based on factors such as removal and population regeneration rates.

To prepare for the Section 106 consultation process, NACE has prepared maps of the parks identified as proposed deer management plan implementation areas depicting the draft Areas of Potential Effect (APE) for each park (see Figures 7 through 23). The draft APE for both direct and indirect effects are limited to the boundaries of each park. A preliminary list of historic resources within the draft APE organized by park is enclosed in this letter. NACE will work with the MD SHPO, the DC SHPO, and other consulting parties to finalize a formal determination of effect through the Section 106 consultation process. NACE has also developed the enclosed list of potential consulting parties.

In accordance with the National Environmental Policy Act (NEPA), NACE will prepare an Environmental Assessment (EA) to document the analysis of potential impacts of the proposed Deer Management Plan. NACE plans to coordinate the Section 106 and NEPA processes per the implementing regulations (36 CFR § 800.8) of the NHPA. NACE will also develop an Assessment of Effect for this project as a separate, but parallel, process to the EA.

We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, please contact Michael Commisso, Chief of Resource Management, at michael_commisso@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara D. Morrison".

Tara D. Morrison
Superintendent

Enclosure:

Deer Management Plan Implementation Area Maps (Figures 1-23)

Preliminary Inventory of Historic Properties

List of Potential Consulting Parties

cc:

Elizabeth Hughes, MD SHPO

Beth Cole, MD SHPO

Tammy Stidham, NPS, NCA

Michael Commisso, NPS, NACE

Joel Gorder, NPS, NCA

2021 03789

F/NPS

ETC



United States Department of the Interior

National Capital Parks-East
NATIONAL PARK SERVICE
Interior Region 1- National Capital Area
1900 Anacostia Drive, S.E.
Washington, D.C. 20020



IN REPLY REFER TO:

1. A.2. (NCA-NACE)

September 1, 2021

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
Division of Historical & Cultural Programs
100 Community Place
Crownsville, Maryland 21032

Dear Ms. Hughes:

In accordance with Section 106 of the National Historic Preservation Act, National Capital Parks-East (NACE), a unit of the National Park Service (NPS), submits for your review and concurrence this finding of No Adverse Effect for the NACE Deer Management Plan/Environmental Assessment (the Plan). A formal Assessment of Effects (AOE) is attached for your review.

Management Summary

As noted in our letter dated April 27, 2021, NPS, in cooperation with the District of Columbia Department of Energy and Environment (DOEE), proposes to implement a White-tailed Deer Management Plan for several parks administered by NACE in Washington, DC, as well as Anne Arundel, Prince George's, and Charles Counties in Maryland. The Plan would guide future actions to manage white-tailed deer (*Odocoileus virginianus*) populations within NACE for at least the next 15 to 20 years. Implementation of the Plan would manage deer populations to promote natural regeneration of forest vegetation and the restoration of cultural landscapes that have been detrimentally affected by deer overbrowsing within the parks.

Description of the Undertaking Relevant to Section 106 of the National Historic Preservation Act and Potential Effects to Historic Properties

The Plan includes using lethal deer management actions to reduce the deer population at NACE park units to an acceptable level with the primary goal of promoting forest regeneration in support of natural ecosystems and cultural landscapes. As described in the AOE, lethal reduction of the deer population would be accomplished by sharpshooting using highly trained firearms experts experienced in conducting

INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS,
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VIRGINIA, WEST VIRGINIA

#dna bc 9/28/2021

wildlife reduction operations. NPS may donate deer meat to local charitable organizations or deer carcasses may be placed in remote portions of the parks away from roads and trails to naturally decompose or to be scavenged. Any deer carcasses that are not suitable for consumption or for surface disposal would be disposed of at an approved local landfill or other disposal facility that accepts deer carcasses. In addition, the Plan includes the continuation of the current management actions to document deer population density and the effects of overbrowsing on forest regeneration and cultural landscapes. Cameras and spotlights used for ongoing deer monitoring surveys would not be mounted on buildings or structures and would be temporary. Bait stations, which consist of automated corn feeders or piles of corn on the ground, would be temporary and located away from areas frequented by visitors. Sharpshooters used to manage deer populations would be made aware of any historic structures or features within the landscape and would position themselves to avoid shooting in the direction of any structures, park buildings, and neighboring properties.

NACE and National Capital Area (NCA) personnel would determine the number of deer to be removed annually within the parks based on recent population surveys and an initial deer density goal of 15 to 20 deer per square mile, as well as past and current experience of other deer management programs, technical feasibility, and success of forest regeneration in later years of plan implementation. It is estimated that the desired deer density goal could be reached at NACE park units in approximately 5 years, though the timeframe would likely vary depending on the implementation area(s), and maintenance would continue thereafter depending on deer densities. Implementation areas could occur in the following parks within NACE:

- Anacostia Park and Kenilworth Park and Aquatic Gardens
- Civil War Defenses of Washington
 - Ft. Mahan
 - Ft. Chaplin
 - Ft. Dupont/Ft. Davis
 - Ft. Staunton/Ft. Ricketts
 - Battery Carroll
 - Ft. Greble
 - Shepherd Parkway
 - Ft. Foote (in Maryland)
- Oxon Run Parkway
- Baltimore-Washington Parkway
- Greenbelt Park
- Suitland Parkway
- Oxon Cove Park, including Oxon Hill Farm and Bald Eagle Hill (note portions of Oxon Cove Park including Bald Eagle Hill are located in Washington, DC)
- Harmony Hall
- Fort Washington Park
- Piscataway Park, including Marshall Hall

Consultation with Native American Groups

On April 27, 2021, consultation initiation letters were sent to the following Federally-recognized Tribes: Delaware Nation, Pamunkey Indian Tribe, Catawba Indian Nation, Eastern Shawnee Tribe of Oklahoma, and Shawnee Tribe of Oklahoma; and the following Tribes recognized by the State of Maryland:

Piscataway Indian Nation, Piscataway Conoy Tribe, Cedarville Band of Piscataway Indians. No comments were received from any of the Tribes.

Finding of Effects

The NPS has evaluated the implementation of the NACE Deer Management Plan and has made the determination that the proposed activities would not change or diminish the character-defining features of historic structures or districts in the APE. Implementing the Plan would not result in ground disturbance or require construction activities that would potentially uncover significant archaeological resources. The Plan would result in improvements to contributing features of some cultural landscapes by promoting forest regeneration and reducing damage to vegetation.

In accordance with 36 CFR Part 800.5, NACE has determined that implementing the Plan would have **No Adverse Effect** on historic structures or districts, cultural landscapes, or archeological sites.

The NPS respectfully requests your concurrence with this determination within 30 days of receiving this letter. If you have any additional questions concerning this matter, please contact Mr. Daniel Weldon, Cultural Resources Program Manager, at daniel_weldon@nps.gov or (202) 465 5176.

Sincerely,

Michael Commisso

On behalf of
Tara D. Morrison
Superintendent

Enclosure

cc: Beth Cole, MHT

I concur that the planned installation of the signs and guardrails does not reflect an adverse effect on historic properties.

Beth Cole
Maryland Historical Trust (SHPO)

9/28/2021
Date



United States Department of the Interior

National Capital Parks-East
NATIONAL PARK SERVICE
Interior Region 1- National Capital Area
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

IN REPLY REFER TO:
1.A.2. (NCA-NACE)

April 27, 2021

Ms. Erin Paden
Tribal Historic Preservation Officer
Delaware Nation
P.O. Box 825
Anadarko, Oklahoma 73005

Dear Ms. Paden:

National Capital Parks-East (NACE), an administrative unit of the National Park Service (NPS), proposes to develop a Deer Management Plan for various parks in Washington, DC, as well as Prince George's and Charles Counties in Maryland. NACE is writing to formally initiate consultation with the District of Columbia State Historic Preservation Office (DC SHPO) and the Maryland Historical Trust (MD SHPO) in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR § 800). The NACE parks being considered as implementation areas for the management plan include the following located within Washington, D.C.:

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INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

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The proposed action includes the continuation of current management activities such as deer population density surveys, the use of forest health survey plots to assess the effects of over browsing, and surveillance and sampling for chronic wasting disease. In addition, the proposed action includes using lethal deer management controls, in the form of culling, to reduce the deer population to an acceptable level, ensuring that the deer population becomes a balanced component of a functioning ecosystem with the primary goal of restoring vegetation, including cultural landscapes, within the identified implementation areas. Currently, the NPS is not aware of effective non-lethal deer management controls that would control the free-ranging deer populations at NACE. The NPS would consider implementing non-lethal controls in the future that are deemed effective and feasible in combination with lethal controls or as part of a deer population density maintenance strategy.

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To prepare for the Section 106 consultation process, NACE has prepared maps of the parks identified as proposed deer management plan implementation areas depicting the draft Areas of Potential Effect (APE) for each park (see Figures 7 through 23). The draft APE for both direct and indirect effects are limited to the boundaries of each park. A preliminary list of historic resources within the draft APE organized by park is enclosed in this letter. NACE will work with the DC SHPO, the MD SHPO, and other consulting parties to finalize a formal determination of effect through the Section 106 consultation process. NACE has also developed the enclosed list of potential consulting parties.

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We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, please contact Michael Commisso, Chief of Resource Management, at michael_commisso@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara D. Morrison".

Tara D. Morrison
Superintendent

Enclosure:

Deer Management Plan Implementation Area Maps (Figures 1-23)

Preliminary Inventory of Historic Properties

List of Potential Consulting Parties

cc:

Deborah Dotson, President, Delaware Nation

Tammy Stidham, NPS, NCA

Michael Commisso, NPS, NACE

Joel Gorder, NPS, NCA

Noel Lopez, NPS, NCA



IN REPLY REFER TO:
1.A.2. (NCA-NACE)

United States Department of the Interior

National Capital Parks-East
NATIONAL PARK SERVICE
Interior Region 1- National Capital Area
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

April 27, 2021

Ms. Glenna J. Wallace
Chief
Eastern Shawnee Tribe of Oklahoma
P.O. Box 350
Seneca, Missouri 64865

Dear Chief Wallace:

National Capital Parks-East (NACE), an administrative unit of the National Park Service (NPS), proposes to develop a Deer Management Plan for various parks in Washington, DC, as well as Prince George's and Charles Counties in Maryland. NACE is writing to formally initiate consultation with the District of Columbia State Historic Preservation Office (DC SHPO) and the Maryland Historical Trust (MD SHPO) in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR § 800). The NACE parks being considered as implementation areas for the management plan include the following located within Washington, D.C.:

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Sincerely,

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Tara D. Morrison
Superintendent

Enclosures:

Deer Management Plan Implementation Area Maps (Figures 1-23)

Preliminary Inventory of Historic Properties

List of Potential Consulting Parties

cc:

Tammy Stidham, NPS, NCA

Michael Commisso, NPS, NACE

Joel Gorder, NPS, NCA

Noel Lopez, NPS, NCA



IN REPLY REFER TO:
I.A.2. (NCA-NACE)

United States Department of the Interior

National Capital Parks-East
NATIONAL PARK SERVICE
Interior Region 1- National Capital Area
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

April 27, 2021

Ms. Natalie Proctor
Chair
Cedarville Band of Piscataway Indians
16816 Country Lane
Waldorf, Maryland 20601

Dear Ms. Proctor:

National Capital Parks-East (NACE), an administrative unit of the National Park Service (NPS), proposes to develop a Deer Management Plan for various parks in Washington, DC, as well as Prince George's and Charles Counties in Maryland. NACE is writing to formally initiate consultation with the District of Columbia State Historic Preservation Office (DC SHPO) and the Maryland Historical Trust (MD SHPO) in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR § 800). The NACE parks being considered as implementation areas for the management plan include the following located within Washington, D.C.:

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- Suitland Parkway

INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS,
NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, VERMONT,
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The proposed action includes the continuation of current management activities such as deer population density surveys, the use of forest health survey plots to assess the effects of over browsing, and surveillance and sampling for chronic wasting disease. In addition, the proposed action includes using lethal deer management controls, in the form of culling, to reduce the deer population to an acceptable level, ensuring that the deer population becomes a balanced component of a functioning ecosystem with the primary goal of restoring vegetation, including cultural landscapes, within the identified implementation areas. Currently, the NPS is not aware of effective non-lethal deer management controls that would control the free-ranging deer populations at NACE. The NPS would consider implementing non-lethal controls in the future that are deemed effective and feasible in combination with lethal controls or as part of a deer population density maintenance strategy.

The number of deer to be removed annually will be based on recent population surveys and the Plan will strive for a deer density goal of 15 to 20 deer per square mile. It is estimated that the desired deer density goal could be reached at NACE in approximately 5 years, though the timeframe would likely vary depending on the implementation areas. Removal could proceed more rapidly based on factors such as removal and population regeneration rates.

To prepare for the Section 106 consultation process, NACE has prepared maps of the parks identified as proposed deer management plan implementation areas depicting the draft Areas of Potential Effect (APE) for each park (see Figures 7 through 23). The draft APE for both direct and indirect effects are limited to the boundaries of each park. A preliminary list of historic resources within the draft APE organized by park is enclosed in this letter. NACE will work with the DC SHPO, the MD SHPO, and other consulting parties to finalize a formal determination of effect through the Section 106 consultation process. NACE has also developed the enclosed list of potential consulting parties.

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We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, please contact Michael Commisso, Chief of Resource Management, at michael_commisso@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara D. Morrison".

Tara D. Morrison
Superintendent

Enclosures:

Deer Management Plan Implementation Area Maps (Figures 1-23)

Preliminary Inventory of Historic Properties

List of Potential Consulting Parties

cc:

Tammy Stidham, NPS, NCA

Michael Commisso, NPS, NACE

Joel Gorder, NPS, NCA

Noel Lopez, NPS, NCA



United States Department of the Interior

National Capital Parks-East
NATIONAL PARK SERVICE
Interior Region 1- National Capital Area
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

IN REPLY REFER TO:
1.A.2. (NCA-NACE)

April 27, 2021

Francis Gray, Chair
Piscataway Conoy Tribe
P.O. Box 287
Pomfret, Maryland 20675

Dear Chair Gray:

National Capital Parks-East (NACE), an administrative unit of the National Park Service (NPS), proposes to develop a Deer Management Plan for various parks in Washington, DC, as well as Prince George's and Charles Counties in Maryland. NACE is writing to formally initiate consultation with the District of Columbia State Historic Preservation Office (DC SHPO) and the Maryland Historical Trust (MD SHPO) in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR § 800). The NACE parks being considered as implementation areas for the management plan include the following located within Washington, D.C.:

- Anacostia Park and Kenilworth Park and Aquatic Gardens
- Civil War Defenses of Washington Parks: Fort Mahan, Fort Dupont, Fort Davis, Fort Chaplin, Fort Stanton, Fort Ricketts, Fort Greble, Battery Carroll, and Shepherd Parkway

Proposed implementation areas include the following NACE parks located within Maryland:

- Fort Washington Park
- Civil War Defenses of Washington Parks: Fort Foote
- Piscataway Park, including Marshall Hall
- Oxon Cove Park, including Oxon Hill Farm and Oxon Run Parkway
- Harmony Hall
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INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

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The proposed action includes the continuation of current management activities such as deer population density surveys, the use of forest health survey plots to assess the effects of over browsing, and surveillance and sampling for chronic wasting disease. In addition, the proposed action includes using lethal deer management controls, in the form of culling, to reduce the deer population to an acceptable level, ensuring that the deer population becomes a balanced component of a functioning ecosystem with the primary goal of restoring vegetation, including cultural landscapes, within the identified implementation areas. Currently, the NPS is not aware of effective non-lethal deer management controls that would control the free-ranging deer populations at NACE. The NPS would consider implementing non-lethal controls in the future that are deemed effective and feasible in combination with lethal controls or as part of a deer population density maintenance strategy.

The number of deer to be removed annually will be based on recent population surveys and the Plan will strive for a deer density goal of 15 to 20 deer per square mile. It is estimated that the desired deer density goal could be reached at NACE in approximately 5 years, though the timeframe would likely vary depending on the implementation areas. Removal could proceed more rapidly based on factors such as removal and population regeneration rates.

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Tara D. Morrison
Superintendent

Enclosure:

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Preliminary Inventory of Historic Properties

List of Potential Consulting Parties

cc:

Mario Harley, Vice Chair, Piscataway Conoy Tribe

Tammy Stidham, NPS, NCA

Michael Commisso, NPS, NACE

Joel Gorder, NPS, NCA

Noel Lopez, NPS, NCA



United States Department of the Interior

National Capital Parks-East
NATIONAL PARK SERVICE
Interior Region 1- National Capital Area
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

IN REPLY REFER TO:
1.A.2. (NCA-NACE)

April 27, 2021

Mr. Billy Tayac
Piscataway Indian Nation
8105 Zachary Road
Port Tobacco, Maryland 20677

Dear Mr. Tayac:

National Capital Parks-East (NACE), an administrative unit of the National Park Service (NPS), proposes to develop a Deer Management Plan for various parks in Washington, DC, as well as Prince George's and Charles Counties in Maryland. NACE is writing to formally initiate consultation with the District of Columbia State Historic Preservation Office (DC SHPO) and the Maryland Historical Trust (MD SHPO) in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR § 800). The NACE parks being considered as implementation areas for the management plan include the following located within Washington, D.C.:

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INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

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Tara D. Morrison
Superintendent

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cc:

Mark Tayac, Piscataway Indian Nation

Tammy Stidham, NPS, NCA

Michael Commisso, NPS, NACE

Joel Gorder, NPS, NCA

Noel Lopez, NPS, NCA



United States Department of the Interior

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1900 Anacostia Drive, S.E.
Washington, D.C. 20020

IN REPLY REFER TO:
1.A.2. (NCA-NACE)

April 27, 2021

Ben Barnes, Chief
Shawnee Tribe of Oklahoma
29 South Highway 69A
Miami, Oklahoma 74354

Dear Chief Barnes:

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Tara D. Morrison
Superintendent

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List of Potential Consulting Parties

cc:

Tonya Tipton, Director of Enrollment, Shawnee Tribe of Oklahoma

Tammy Stidham, NPS, NCA

Michael Commisso, NPS, NACE

Joel Gorder, NPS, NCA

Noel Lopez, NPS, NCA