

THE WILDLIFE SOCIETY

5410 Grosvenor Lane • Bethesda, MD 20814-2144

Tel: (301) 897-9770 • Fax: (301) 530-2471

E-mail: tws@wildlife.org

8 September 2009

Valerie Naylor, Superintendent
Attn: Elk Management Plan
Theodore Roosevelt National Park
P.O. Box 7
Medora, North Dakota 58645

via email to: thro_forum@nps.gov

Dear Superintendent Naylor:

The Wildlife Society appreciates the opportunity to provide comments on the preferred alternatives selected for the Draft Environmental Impact Statement (DEIS) for the management of elk within the south unit of Theodore Roosevelt National Park (TRNP). The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association representing over 8,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

The Wildlife Society supports the Park Service's efforts to manage the elk population at TRNP in a manner that is compatible with its other natural and cultural resources. Both The Wildlife Society and our North Dakota Chapter reviewed the DEIS and the alternatives selected for elk herd management, and provided comments in March. With the identification of a preferred alternative, we offer the following comments.

The proposed desired condition of a "lightly grazed system" in TRNP recognizes the need to balance use by all animal groups using the grassland ecosystem. Since the proposed elk herd goals are predictive and the resulting impacts need to be ratified by experience and testing the results, we believe that the studies and discussion presented support the conservative goals of 100 minimum to 400 maximum set out in the DEIS, and are suitable for testing this management plan during the proposed project plan life of 15 years.

In our March 2009 comments, we recommended that the park adopt Alternative C (Roundup and Euthanasia) as the best alternative to accomplish the TRNP elk management objective. We selected this option because the Park Service has experience in conducting this type of operation, it is the most efficient and timely of all the alternatives, and it minimizes complications with the unknowns associated with other alternatives such as weather delays, carcass removal issues, access to elk in badlands topography, adjacent land owner acceptance, and length of time to accomplish the desired outcome. Further, it allows the most precision in selecting which

individual animals will be retained or removed from the herd to meet population management goals.

We noted that the methods called for by Alternative B (Direct Reduction with Firearms) and Alternative C (Roundup and Euthanasia) have proven track records at the park and in other circumstances, giving credibility as realistic alternatives. Therefore, we support the inclusion of elements from both of these alternatives in the preferred alternative. A timely and efficient initial reduction in elk numbers will lessen the chance of elk dispersing on to private land and causing problems for neighboring ranchers. To the extent it is compatible with the stated goals, bulls should not be put down, but released back into the park. By focusing the reduction on the female segment of the population, excess satellite bulls will likely continue to wander out of the park, thereby giving hunters the opportunity to have access to harvest these animals.

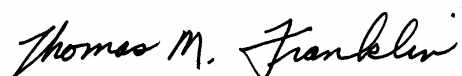
However, we still have concerns about translocation (Alternative D) as a viable option because there is currently no definitive live test for Chronic Wasting Disease (CWD) in elk. Therefore, adherence to the federal moratorium on transporting live elk outside the TRNP for release should be maintained. Translocation of native and exotic wildlife, captive propagation of wildlife, and high fence enclosures have been identified as three of the top five risk factors associated with the spread of diseases such as CWD and tuberculosis in wildlife, and therefore must be carefully regulated. Because of these concerns about the effects of translocation, we do not agree that Alternative D is the environmentally preferred alternative.

We support the exclusion of Alternatives E and F from the preferred alternative. Alternative E (Hunting outside the Park) does not seem practical due to the difficulties in obtaining landowner and agency acceptance, and the lack of experience in accomplishing this type of action. In Alternative F, fertility control agents would be used for maintenance of the elk herd once the initial herd reduction has been accomplished, if and only when suitable agents are developed that meet the criteria detailed in the DEIS. Currently the use of immunocontraceptives is not a viable option for use on the elk herd and until research proves that acceptable agents and efficient and effective delivery systems are available, the Park Service should not consider this Alternative as a management tool.

We commend the Park Service on its flexibility and recognition of the need for Adaptive Management, which allows managers to adapt to changing conditions and new information. In summary, we support the Park Service's goal to maintain a population of 100-400 individuals within the herd and encourage the implementation of Alternatives B and C for management. Incorporating elements from both in the preferred alternative will provide the optimum, most efficient management solution. We maintain that Alternatives D, E and F should be excluded from the preferred alternative due to the associated risks and constraints. Adherence to these principles will lead to the most effective management of elk in the TRNP.

Thank you for considering the views of wildlife professionals.

Sincerely,

Handwritten signature of Thomas M. Franklin in cursive script.

Thomas M. Franklin
President