

Chapter 5 – Consultation and Coordination
Response to Comments

STATE OF CALIFORNIA—THE RESOURCES AGENCY

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200
FAX (415) 904-5400

ARNOLD SCHWARZENEGGER, GOVERNOR

Point Reyes
National Seashore

AUG 10 '05



August 5, 2005

Don L. Neubacher
Superintendent,
Point Reyes National Seashore
ATTN: Natalie Gates
Point Reyes, CA 94956

Subject: Negative Determination ND-078-05, Non-Native Deer Management Plan, Point Reyes
National Seashore, Marin County

Dear Mr. Neubacher:

The Coastal Commission staff has reviewed the above-referenced negative determination. The National Park Service (NPS) proposes to implement a management plan for the eradication of non-native axis and fallow deer from within Point Reyes National Seashore by the year 2020 through a combination of long-lasting contraceptives and lethal removal. Individuals of both species were purchased from the San Francisco Zoo in the 1940s and 1950s and released on the Point Reyes peninsula by a private landowner before the establishment of the Seashore. The NPS estimates that currently there are approximately 250 axis and 860 fallow deer within the Seashore. Populations of both species of deer have increased in recent years and the range of fallow deer appears to be expanding eastward, towards and beyond the seashore boundary.

Point Reyes National Seashore is comprised of land and water owned and controlled by the NPS. Section 304(1) of the Coastal Zone Management Act excludes from the coastal zone all lands held in trust by or whose uses are subject solely to the discretion of the federal government. Notwithstanding this exclusion, if proposed activities on excluded lands could affect land or water uses or natural resources of the coastal zone, those activities must be reviewed for consistency with the California Coastal Management Program. It is in this context that the proposed management plan for the removal of non-native deer within the Seashore is reviewed.

The Point Reyes National Seashore 1999 Resource Management Plan (RMP) states that:

Regardless of potential competition and disease issues, the presence of these non-native deer compromises the ecological integrity of the Seashore and the attempts to reestablish the native cervid fauna comprising tule elk and black-tailed deer.

The proposed management plan states that removal of non-native deer would assist the NPS in the restoration of soils, water quality, aquatic habitat, riparian vegetation, forest understories, and threatened and endangered species habitat for salmonids and red-legged frogs within the Seashore that have been and continue to be damaged by the presence of non-native deer. In

ASST. DIR.	
ASST. SUP.	
AD. PK. USES	
ENFORC.	
SCIENCE	
MANAGE. CONS.	
WILDLIFE	cc: WILDLIFE
RES.	AGT.
CONTRACTING	
PERSONNEL	
BUDGET	
CENTRAL FILES	

Chapter 5 – Consultation and Coordination
Response to Comments

ND-078-05 (National Park Service)
Page 2

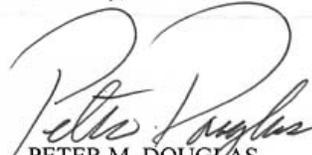
addition, the proposed activity would prevent the spread of non-native deer into surrounding private and public lands (including lands within the coastal zone) and the consequent spread of natural resource impacts, and would address adverse impacts to agricultural permittees by non-native deer within the Seashore.

The NPS proposes to eradicate all axis and fallow deer within the Seashore by 2020. A percentage of fallow deer would be treated with a long-acting contraceptive, and both axis and fallow deer would be removed by NPS staff trained in wildlife sharpshooting. The NPS reports that population modeling for fallow deer at the Seashore suggests that total numbers of both species of non-native deer removed by 2020 are projected to be at least 1,350 (800 axis and 550 fallow deer), while total numbers of fallow does treated by 2020 with a contraceptive could range from 100 to 150. The population and distribution of non-native deer within the Seashore would continue to be monitored throughout the 2005-2020 time period.

Temporary area closures (excluding beaches) may be required for the safe capture and culling of non-native deer and may temporarily inconvenience visitors to the Seashore. Increased noise from aircraft use or firearms may temporarily result in the loss of peace and quiet in the Seashore during periods of non-native deer management activities. Over the long term, however, removal of two invasive animal species will enhance the quality of the visitor experience by contributing to the restoration of damaged habitats within the Seashore and providing increased opportunities for viewing native deer and elk in the Seashore. In addition, the proposed action would keep non-native deer from migrating into the coastal zone and adversely affecting environmentally sensitive habitats.

In conclusion, the Commission staff **agrees** that implementing the non-native deer management plan within Point Reyes National Seashore will not adversely affect coastal zone resources. We therefore **concur** with your negative determination made pursuant to 15 CFR 930.35 of the NOAA implementing regulations. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,



PETER M. DOUGLAS
Executive Director

cc: North Central Coast District Office
California Department of Water Resources
Governor's Washington, D.C., Office