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April 8, 2005

Mr. Don Neubacher, Superintendent
Point Reyes National Seashore
Point Reyes Station, California 94956

**Re: National Park Service Non-Native Management Plan/Draft
Environmental Impact Statement – Point Reyes National Seashore**

Dear Superintendent Neubacher:

On behalf of the Marin Conservation League's Board of Directors, I am writing to voice MCL's strong support for the National Park Service's Preferred Alternative which would eradicate both species of non-native deer from the Point Reyes National Seashore by 2020 in the December 2004 Non-Native Management Plan/Draft Environmental Impact Statement - Point Reyes National Seashore (hereinafter Draft Plan). The League, whose mission is to preserve, protect and enhance the natural assets of Marin County, is deeply concerned about the significant impacts that exotic species are having on biological diversity and our ecosystems – both locally and worldwide.

The presence of hundreds of Axis deer (*Axis axis*) and Fallow deer (*Dama dama*), both non-native cervids introduced decades ago into what is now the Point Reyes National Seashore, not only are competing directly with native species for food and cover, but are also degrading their habitats by adversely impacting the area's soils, vegetation and water. Failing to address these problems through a scientifically-based deer management plan will only perpetuate and amplify these impacts within the National Park boundaries and eventually throughout Marin County.

MCL has carefully reviewed the Draft Plan alternatives and believes that the Service compellingly demonstrates that Alternatives B and C, which call for controlling non-native deer numbers for both species at a pre-determined level, are biologically and scientifically misguided and uneconomic. If adopted, these actions would result in thousands of animals being killed in perpetuity, millions of dollars in public funds being expended, and valuable staff time being diverted, with only limited benefit to the National Seashore's ecosystems. It is clear that

Marin County's Environmental Watchdog

A nonprofit corporation founded in 1934 to preserve, protect and enhance the natural assets of Marin County

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the most environmentally responsible alternative must include complete eradication of both Axis and Fallow deer, as proposed in Alternative E.

The Draft Plan reviews the current state of contraceptive technology and argues convincingly that contraception alone will not remove all the non-native deer from the National Seashore. Although lethal removal is clearly the most effective and economical method for management and removal of non-native deer populations, the Service needs to develop contraceptive methodology for potential application to other federal lands and so includes the use of limited contraception in its Preferred Alternative. That said, the Service's overriding management goal must be the timely removal of both Axis and Fallow deer and eliminating the environmental impacts these non-native species are having on the Seashore's ecosystems.

While there are those who oppose the use of lethal means for removing Axis and Fallow deer, these concerns should not override critical management decisions made by park professionals charged with overseeing the protection and restoration of federal lands. The Service's mandate is to protect and restore native wildlife and plant life on its lands. For this reason MCL believes that preserving an introduced invasive species at the expense of the health of an entire ecosystem would be unjustified and a poor use of American taxpayers' money.

Thank you for the opportunity to comment on this important matter and we look forward to reviewing the Final Environmental Impact Statement in the coming weeks.

Sincerely,



Jana Haehl
President