

Chapter 5 – Consultation and Coordination
Response to Comments

UNIVERSITY OF CALIFORNIA, BERKELEY

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28 March 2005

Mr. Don Neubacher, Superintendent
Attention: Non-Native Deer Plan
Point Reyes National Seashore
Point Reyes Station CA 94956

Re: Exotic Deer Control Plan

Dear Mr. Neubacher:

I want to express my support for the Exotic Deer Management Plan currently open for comment, and endorse the preferred alternative.

I had been a professor of wildlife biology and management for 40 year until my retirement last fall, but still remain active in research and management issues. I spent most of my career studying the ecology and behavior of large mammals and, in fact, did much of the basic work supporting the models used in this report. I have had a long involvement with wildlife policies at Point Reyes National Seashore, having visited there before its establishment, and served on a number of formal and informal reviews of issues. Therefore, I feel qualified to make professional judgments concerning the exotic deer report.

First of all, technical matters. I think the report is strongly supported by the science available now, and it is more than adequate to the purpose. Yes, some things will prove to be a bit in error, but the essential facts are well founded on objectively pursued research, both at Point Reyes and elsewhere. It further should be noted that because of its inherent natural values, Point Reyes National Seashore has been blessed with an inordinate amount of large mammal research. On-site documentation is available, and has been for a long time.

The two modelers (Barrett and Hobbs) who submitted analysis of the impacts are well known to me (literally since they were students), and both are excellent at this work. The results are as close to accurate as can be had, firstly because the basic principles underlying the models have withstood the test of time, and secondly because of the rich body of information specifically from Point Reyes peninsula. Although no rational scientist would claim that the results are exact, the predictions are almost certainly within 5-10% of the correct ones, and this degree of accuracy is far more than need to support

the management actions being proposed. In general, the report is modest in its claims, and gives a conservative evaluation, given the abundance of data and length of time things have been studied at Point Reyes.

Second, I will address the emotional issues. I am well aware that animal protection groups will find the use of lethal means objectionable on moral grounds, and this is a position with which I sympathize. I too regret that such an approach is necessary, especially in a National Seashore, and wish it was not. Still, these objections must be balanced against countervailing moral issues, and must take into account the practical consequences of what needs to be done.

Thus, the need for lethal control of exotic deer at Point Reyes must be weighed against the imperative that we stop and, to the extent possible, reverse the effects of wholesale transporting of exotic species about the globe by humans. The devastating ecological effects of so-called “invasive species”, which label masks that most of them are not “invasive” having been put there against their will by humans, is one of the moral outrages of our time. These deer simply should not have been put at Point Reyes in the first place. What about our moral obligation to native species? Just because it takes more diligence to see the losses due to exotics do we claim ignorance, and give greater weight to exotics and less to native species? That the exotic deer were introduced through ignorance in the past only heightens the moral obligation for us to avoid further ignorance now. Yes, it is easy to sympathize with the exotic deer. But we should not use that as a façade to hide our even greater moral obligation to native species.

In many cases it is impossible to correct the consequences of unwise introductions. That it is possible to do so in the case of exotic deer on Point Reyes, however, places a heavy moral burden on us to act responsibly to protect native species from the impacts of exotics. And, we must do it sooner rather than later. Fallow deer are now spreading eastward rapidly, as I have seen myself, and we will soon lose the containment that, fortunately, we have had up to this time. I do not want to repeat my regret that the eastern fox squirrel, once found solely on the Berkeley campus (and fed by well-meaning people), could have been eradicated easily in the 1960s. Now, it has not spread throughout the East Bay and is moving into the Central Valley, displacing the native gray squirrel along the way. It is too late to eradicate them now. I sincerely hope we do not make the same mistake with fallow deer.

This brings me to means. It would be wonderful if reproductive intervention was magic, but it is not. The methods available to date are far from perfect, which is why so few of them are approved for use. In situations where animals can be captured and handled easily, they work fairly well, but not without trauma. These are wild animals, and all of their stress responses are triggered by capture, predation-like events. They simply can not know that we are subduing them with such noble and caring intentions, and hope to release them without harm. Still, the big problem is that we do not have the means to deliver the contraceptives or surgical alterations to a sufficient proportion of the population to achieve the goal—either control or eradication in most cases in the wild.

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I think the preferred alternative in the plan presents a balanced application of contraceptive and lethal methods to the exotic deer problem. In essence, contraception is used to the extent it can be applied successfully, and that, in turn, reduces the need to use lethal means. It is impossible to know in advance the optimum mix of the two approached to minimize the total mortality. This depends on how contraception works out. To the extent contraceptive fails to meet the objective, however, lethal means will have to be employed.

Sincerely,

A handwritten signature in black ink that reads "Dale R. McCullough". The signature is written in a cursive, flowing style.

Dale R. McCullough
Emeritus Professor of Wildlife Biology