June 30, 2016

The Honorable Sally Jewell
Secretary of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Jewell:

The Wildlife and Hunting Heritage Conservation Council (Council) was recently made aware of a National Park Service (NPS) report entitled “Elk Management in the National Park Service – Two Case Studies in the Use of Public Volunteers” (Natural Resource Report NPS/NRSS/BRD/NRR – 2016/1119). As noted in its title, this peer reviewed report, produced by the Natural Resource Stewardship and Science Office, describes the positive outcomes associated with using public volunteers to address unnaturally concentrated elk populations in two national parks where hunting is not authorized.

First and foremost, we would like to applaud the NPS for their efforts to undertake a comprehensive analysis of the agency’s efforts to address locally high elk densities in Rocky Mountain and Theodore Roosevelt National Parks. Based on past briefings provided to the Council by the NPS along with the collective experience of those on the Council, we are familiar with the challenges associated with effectively managing ungulate populations in NPS units where the agency is unable to utilize hunting as a management tool due to statutory mandate (16 USC §26) and Federal regulations (36 CFR §2.2). Consequently, we were pleased to see that the NPS has identified, implemented and critically evaluated alternative strategies that fit within this legal framework to address these challenges in cooperation with state fish and wildlife managers, volunteers from the sportsmen’s community and tribal nations.

Specifically, we would like to highlight the following findings that were included in the report:

- State fish and wildlife managers and NPS employees recognize elk as shared resources that are subject to joint management responsibility;

- The concept of using volunteers to manage ungulate populations met the fundamental NPS need to stay consistent with its mandate to prohibit hunting in national parks and met the states’ need to be consistent with many of the principles described in the North American Model of Wildlife Management;

- As part of the NEPA process, the inclusion of public volunteers was included in the preferred alternative at each park and served as an avenue to meet the needs of both the parks and state wildlife agencies involved;
Despite strong reservations initially, NPS personnel at both parks found that the elk management volunteers they recruited, trained and worked alongside were tremendously valuable assets to the programs. State fish and wildlife managers echoed these sentiments and noted that the volunteer programs provided a positive alternative to traditional hunting;

The estimated value of volunteer hours spent at both parks in concert with the elk removal programs totaled $280,000. At Rocky Mountain National Park, public volunteers have been retained and continue to assist with elk ground count surveys, vegetation monitoring and elk exclosure monitoring;

Elk management population goals were achieved at both parks within three years of initiating the programs that included public volunteers;

Rocky Mountain and Theodore Roosevelt National Parks demonstrated that with appropriate supervision and training, volunteers can safely and successfully remove large numbers of ungulates from the landscape and can do so in a safe, efficient and cost effective manner when compared to using solely agency personnel. The experience gained through these two parks is potentially applicable to other overabundant ungulate situations, including white-tail deer and management, within the National Park System.

The release of this report is very timely as its findings should be applied to the Bison Herd Reduction Environmental Assessment (EA) for Grand Canyon National Park. The 2016 Public Scoping Newsletter regarding the development of an EA on a bison reduction plan listed management tools under consideration such as capture/removal, sharpshooting and localized fencing of sensitive park resources. The list did not include the use of citizen volunteers as agents to achieve the desired population level despite the fact that a separate NPS report entitled “Grand Canyon Bison Nativity, Genetics, and Ecology – Looking Forward” (Natural Resource Report NPS/NRSS/BRD/NRR – 2016/1226), noted that initial population reduction to reach objectives would best be achieved through an approach that includes lethal removal conducted by skilled volunteers.

Even though the newsletter was released before the findings of the report were made public, the NPS already had available the experiences of staff in the use of volunteers in wildlife population reduction plans, specifically the elk reduction plans for Rocky Mountain and Theodore Roosevelt National Parks. The report confirmed that using volunteers, rather than contracting professional sharpshooters in these two national parks had a number of benefits, including cost effectiveness and safety. The Council strongly encourages the Grand Canyon National Park to include the use of volunteers as the preferred alternative for the proposed management action in the EA.

The newsletter noted that the NPS would be collaborating with state and federal partners on the EA. The Arizona Game and Fish Commission submitted comments stating that the bison plan should have included the most “cost-effective solution that would utilize the state’s sportsmen and women.” In this regard, we believe that the Arizona Game and Fish Department would be an enthusiastic partner in ensuring the success of using volunteers for the bison plan. We also believe that Colorado Parks and Wildlife and North Dakota Game and Fish Department would be willing to share their experiences in the selection, training, and management of volunteers for the bison plan.

The Council recommends the use of skilled volunteers be made a required consideration for all units of the National Park System where overpopulation of wildlife is or could become a concern and where hunting, which would be the most cost effective and efficient management tool, is not allowed. All such units should, in collaboration with the respective state fish and wildlife agencies, give serious consideration to using citizen volunteers in addressing wildlife overpopulations.
The Council also recommends that the NPS issue another newsletter regarding planning for Grand Canyon National Park Bison management, advising the public of the report. The Council further recommends that citizen volunteers be included in the suite of management tools proposed as the preferred alternative in the draft EA, allowing the public to further comment on this approach. The Council also requests that this letter be included in the record of public comment associated with the 2016 Public Scoping Newsletter.

Sincerely,

[Signature]

John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council