

Quality Deer Management Assoc.
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10 October 2006

Ms. Kristina Heister
Natural Resource Manager
Valley Forge National Historic Park
1400 North Outer Line Drive
King of Prussia, PA 19406

Dear Ms. Heister,

On behalf of the Quality Deer Management Association (QDMA), I am writing to provide input on the Valley Forge National Historic Park Deer Management Plan. The QDMA is a national nonprofit wildlife conservation organization dedicated to ethical hunting, sound deer management and preservation of the deer-hunting heritage. The QDMA has over 40,000 members nationwide, including more than 3,000 of the nation's leading deer biologists, researchers and managers. As such, QDMA is widely regarded as the most respected whitetail organization in the United States.

There is a need for a white-tailed deer management plan for the Park that supports long-term protection, preservation and restoration of native species and other park resources. A successful deer management program will balance the deer herd with the available habitat, keep deer from adversely impacting forest regeneration, sensitive vegetation and other wildlife species. The current deer density is above the carrying capacity of the habitat and the habitat shows clear signs of being negatively impacted by the deer herd.

The public scoping brochure lists the following five preliminary management strategies.

Existing Management Continue

This approach does not target the deer abundance problem. The current deer population is negatively impacting the Park's native vegetation and other wildlife species. An aggressive, active deer management program should be implemented to improve the health of the deer herd and minimize the negative impacts on other plant and animal species. This approach will not meet those objectives.

Reproductive Control

This approach involves using fertility control to limit or prevent new animals from being born in to the population but it does not address the current overabundance issue. Much research has been conducted over the past four decades to develop an effective contraceptive that can be used on free-ranging herds. Unfortunately much confusion surrounds the status of fertility control agents. The perception that overabundant deer herds can be controlled solely with fertility drugs is false. Successful fertility control may limit population growth but it does little to reduce the existing population. In small, isolated areas inaccessible to hunting or sharpshooting programs, this alternative may be useful at maintaining deer densities at acceptable levels following a herd

reduction. However, this alternative does not reduce deer populations, it is expensive and retreatment of does is necessary. There also may be unknown long-term effects on deer behavior. This approach will not solve the Park's deer problem.

Lethal Reduction with Firearms by Specially Trained Professionals

Sharpshooting is considered the most humane method of reducing a deer herd by the American Veterinary Association. Sharpshooting programs have been successfully employed in many communities across the country by private consultants, local police authorities and federal agency personnel. This approach is proven to be successful at reducing deer populations and the meat can be donated to food banks. Deer populations can be reduced quickly and this is the preferred removal technique in areas inaccessible to hunting. However, this approach is expensive relative to hunting and it is a controversial technique if hunting is an option. This is a viable alternative in areas inaccessible to hunting and it should be incorporated in to the Park's deer management program.

Lethal Reduction without Firearms by Specially Trained Professionals (Archery and Capture and Euthanasia)

Sharpshooting programs using archery equipment are generally less efficient than programs using firearms. However, this method is preferred over approaches that do not target the deer abundance problem.

Capture and euthanasia is a variation of a trap and transfer program. This alternative is labor intensive, expensive, impractical and stressful to deer before they are euthanized. This alternative is not a viable option for a long-term successful deer management program.

Fencing of Vegetation Communities

This approach does not target the deer abundance problem. Fencing can be effective at reducing deer damage or conflicts but the relief is temporary and should not be confused with solving the problem. Fencing is a reliable method for addressing site-specific areas but is prohibitively expensive for large-scale use. Fencing also moves the problem elsewhere or further increases the impacts in the unfenced adjacent areas. This approach should not be used alone but could be part of a successful deer management program.

Additionally, we request that you consider regulated hunting as another management strategy. Regulated hunting has been proven to be an effective deer population management tool, it is cost effective, it results in immediate removal of animals from the population, and it is the principal management tool used by state agencies to manage free-ranging deer. Wildlife management agencies recognize this approach as the only effective, practical and flexible method available for regional deer population management. By using regulated hunting, biologists can maintain deer populations at desirable levels or adjust them in accordance with local biological and/or social needs by manipulating the size and sex composition of the harvest; season type, timing and length; and by the number of permits.

Safety is paramount when using regulated hunting as a management tool. Fortunately, research clearly shows hunting is safe. American Sports Data, Inc. conducted an extensive study in 2002 that examined more than 100 sports and activities. Twenty-eight activities, including cheerleading and aerobics, had higher injury rates than hunting. Safety concerns with hunting can be minimized by having potential hunters pass written exams and weapon proficiency tests. Written exams can identify hunters who possess an acceptable level of knowledge on deer

biology, management and shot placement. Weapon proficiency tests identify hunters who handle weapons safely and have the ability to consistently achieve proper shot placement. Hunters can even be required to hunt from elevated stands so all shots are directed at the ground and weapon type can be regulated to maximize public safety. Where rifles, shotguns and muzzleloaders are not permitted, archery equipment can be used. Archery hunting has the advantage of being a relatively discreet and silent activity. These attributes and the limited shooting range make archery hunting a safe and nondisruptive removal technique.

In addition to safety concerns, we understand that many segments of the public enjoy watching this highly visible deer population. However, when deer densities surpass the carrying capacity of the habitat, deer and habitat health decline. This situation is neither good for the deer population nor for the habitat or other wildlife species. We feel it is important for the Park administration and the public to be aware of this when considering management options.

We realize some National Park administrations do not favor hunting as a viable alternative. However, many National Parks utilize hunters to meet their deer management objectives. Regulated hunting may not be applicable throughout the Park but there are many areas where this alternative could be used. Regulated hunting is a proven approach and it is the most efficient and least expensive option for removing deer. It results in immediate removal of animals and the meat can be used by hunters or donated to food banks.

We request you include regulated hunting as a viable alternative for the Park's deer management program. A combination of alternatives including regulated hunting, sharpshooting and fencing in isolated areas will likely provide the most successful results. We appreciate the opportunity to provide input regarding the deer situation at Valley Forge National Historic Park. Please contact me with any questions/comments, or if I can provide additional information.

Respectfully,

Kip P. Adams
Certified Wildlife Biologist,
Director of Education & Outreach