

NATIONAL RIFLE ASSOCIATION OF AMERICA

INSTITUTE FOR LEGISLATIVE ACTION

11250 WAPLES MILL ROAD

FAIRFAX, VIRGINIA 22030



NRA

March 13, 2009

Superintendent Valerie Naylor
Theodore Roosevelt National Park
Box 7
Medora, ND 58645-0007
RE: Draft Elk Management Plan

Dear Superintendent Naylor:

The National Rifle Association (NRA) appreciates the opportunity to comment on the Draft Elk Management Plan (Plan) that examines several alternatives for addressing the rapid increase in the Park's elk population. The NRA is a 138-year-old organization with nearly 4 million members whose primary mission is to defend the Constitutional right to own and use firearms; to lead the field in firearms education and training; and to promote hunting and the management of wildlife based upon the principles of the North American Model of Wildlife Management.

The NRA recommends that the National Park Service adopt an approach, with modifications, that combines Alternative B, the direct reduction of elk using firearms, and Alternative E, increasing hunting opportunities outside the Park in coordination with state actions to reduce and maintain the elk population in the Park. The requested modifications relate to several issues.

First, Alternative B states that the reduction would be carried out by qualified federal employees and authorized agents that would include, but not be limited to, other agency and tribal personnel, contractors, or skilled volunteers. The NRA strongly encourages the Park to use federal employees in combination with hunters. We do not see any need for the expenditure of taxpayers' dollars to hire contract shooters when there is likely to be a pool of skilled volunteers in the hunting community of North Dakota.

It would have been helpful if the Plan had explained how Alternative B compares to the lethal reduction alternative adopted by the Rocky Mountain National Park, and provided an explanation of the differences between the two approaches.

Second, Alternative B uses the term "elk management teams" but does not identify who will participate on these teams, only that qualified skilled volunteers would become part of a pool of available personnel that may supplement elk management teams. It also does not explain what kind of a system the Park will develop to identify skilled volunteers.

We highly recommend that the Park work closely with the North Dakota Game and Fish Department (NDGF) in identifying volunteers within the hunting community.

Third, the NRA is adamantly opposed to the requirement in Alternative B that only non-lead bullets be used. Just this week, the Service announced its intent to eliminate the use of lead ammunition and lead fishing tackle by the end of next year. This policy announcement was made without any communication having been conducted with the affected publics. No supporting documentation or scientific evidence was provided. This policy mirrors what Alternative B is seeking to put into place. It would suggest that the lead ammunition ban called for in Alternative B was a springboard for the Service's newly announced policy.

There is a substantial body of scientific evidence that shows that lead ammunition does not pose health risks to humans, or wildlife populations as a whole. Certainly, there is no information to suggest that using lead ammunition in an elk culling operation will pose a risk to the health of Park staff and visitors or a threat to other Park wildlife.

Rather than address the science behind lead ammunition in comments to this Plan, the NRA strongly recommends that the lead ammunition ban be removed from Alternative B and that the discussion on this issue be elevated to the national level to engage the Service and national hunting, fishing, shooting, and wildlife conservation organizations.

The lead ammunition ban proposed in Alternative B will be seen as the first ban on lead ammunition following the Service's policy announcement. Rocky Mountain National Park did not require the use of non-lead ammunition in its elk management plan so it begs the question as to the motivation to apply it here. Further, while Alternative B would not be implemented as a hunt, the NDGF are the wildlife professionals who determine what firearms and ammunition are appropriate for killing big game animals. If the NDGF does not require non-lead ammunition for taking elk, the Park should not put itself in the position of dictating otherwise.

In combination with a modified Alternative B, the NRA supports the approach of Alternative E that calls for the Park to work with the NDGF to identify supporting landowners who are willing to have elk dispersed on their land and open it to hunting. On the assumption that there will be adequate acreage to implement this Alternative given the number of landowners willing to participate in Alternative B, it would increase public hunting opportunities on the perimeter of the Park since hunting is not an option to maintain ecologically balanced elk numbers inside the Park.

Thank you for the opportunity to comment on the elk management plan.

Sincerely,



Susan Recce

Director

Conservation, Wildlife and Natural Resources