March 12, 2009

E-19J

Superintendent Constantine Dillon
United States Department of the Interior
National Park Service
Indiana Dunes National Lakeshore
1100 North Mineral Springs Road
Porter, Indiana 45304

Re: Draft White-tailed Deer Management Plan (Plan)/Draft Environmental Impact Statement (EIS), Indiana Dunes National Lakeshore, Lake, Porter, and LaPorte Counties, Indiana
EIS No. 20090028

Dear Superintendent Dillon:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Draft EIS and Plan for proposed white-tailed deer management in the Indiana Dunes National Lakeshore (National Lakeshore). Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Plan/Draft EIS indicates that a management plan for white-tailed deer is needed to ensure that the local deer population does not become a dominant force within the National Lakeshore, negatively influencing ecosystem components, particularly sensitive vegetation and other wildlife. Impacts to these resources would compromise the National Lakeshore's mandate to preserve the exceptional biodiversity found within its boundaries. Preservation of biodiversity within the National Lakeshore is critical, given that public lands are increasingly important as refuges for sensitive species.

The Plan/Draft EIS identifies several negative effects on ecosystem diversity from a large deer population in the National Lakeshore. Many avian species, particularly ground and intermediate canopy nesters, and a variety of other wildlife are negatively affected by the impacts of deer browsing on herbaceous and woody vegetation of the forest understory. Numerous studies have shown that white-tailed deer browsing can negatively influence the reproductive success of plants and the long-term population stability of certain plants within a plant community. Soils are affected primarily by erosion resulting from loss of vegetative ground cover due to excessive deer browsing. Water quality is affected primarily by the associated sedimentation due to increased erosion and by increases in *E. coli* levels associated with deer scat from greater deer densities. Disturbance to vegetation from excessive deer browsing could also create opportunities for non-native invasive plant species to become established or spread across more acres of the National Lakeshore. Residential areas, resource conservation areas, and local farms also experience pressures from deer browsing. A large deer population also increases the risk of deer-vehicle accidents on roadways in and around the National Lakeshore.

In addition to the no-action alternative (Alternative A), the Plan/Draft EIS describes three action alternatives to manage deer as well as the impacts resulting from each alternative. Alternative B would include the actions currently undertaken as part of Alternative A – limited fencing, limited use of repellents, and inventorying and monitoring – and incorporate non-lethal actions to reduce deer population numbers. Alternative C would include all actions described under Alternative A as well as a direct reduction of deer through sharpshooting and capture/euthanasia, where appropriate. Alternative D would include all actions described under Alternative A with a combination of specific lethal and non-lethal actions taken from Alternatives B and C. These specific actions include sharpshooting, capture/euthanasia and phasing in of non-surgical reproductive control of does for longer-term maintenance of lower deer population numbers. The impact analysis for all alternatives is based on the principles of adaptive management, allowing the NPS to change management actions when information emerges from monitoring results and ongoing research throughout the life of the proposed 15-year plan.

The Plan/Draft EIS indicates that Alternative D is the preferred alternative to manage deer population numbers. This alternative was selected as the best measure to protect the biological and physical environment by ensuring an immediate reduction in deer population numbers. Reduced deer population numbers will allow revegetation to occur more quickly throughout the National Lakeshore because browsing pressure would be decreased. Rapid deer population decreases would provide the National Lakeshore's habitats the opportunity to recover, improving habitat for wildlife and beneficial impacts to water quality.

Based on the information contained in the Plan/Draft EIS, we believe the preferred alternative best addresses the purpose and need as stated within the document. Therefore, we rate this project as *Lack of Objections (LO)*. A summary of the rating system used in the evaluation of these documents is enclosed for your reference.

Thank you for the opportunity to review and comment on proposed management actions in the National Lakeshore. If you have any questions regarding the contents of this letter, please contact Kathleen Kowal of my staff at (312) 353-5206 or via email at kowal.kathleen@epa.gov.

Sincerely,

/s/ Kenneth A. Wetlake

Kenneth A. Westlake, Supervisor
NEPA Implementation
Office of Enforcement and Compliance Assurance