



**Rob Edward, Director**  
Carnivore Recovery Program

January 28, 2009

Ken Salazar  
U.S. Secretary of the Interior  
1849 C. Street, NW  
Washington, DC 20240

Nancy Sutley, Chair  
Council on Environmental Quality  
730 Jackson Place, NW  
Washington, DC 20017-1659

Peter Orszag, Director  
Office of Management & Budget  
725 17th Street, NW  
Washington, DC 20503

**Re: Elk Culling in Rocky Mountain National Park**  
Sent also via electronic mail and fax

Dear Mr. Secretary, Madam Chair and Mr. Director:

I am writing to you today regarding the impending use of firearms within Rocky Mountain National Park to kill elk as part of a plan to rescue the Park's vegetation from overuse by elk. Although the management plan's goal is laudable, its implementation raises immediate concerns regarding the Bush Administration's last minute repeal of the 25-year ban on loaded and concealed firearms in national parks. In particular, the elk culling plan, set to be initiated as early as this week, will involve the use of civilian volunteers to shoot elk, under Park Service supervision. Moreover, implementation of the plan signals the beginning of a multi-decade, multi-million dollar boondoggle that flies in the face of National Park Service's mandate to restore natural ecological processes.

Notably, the National Park Service failed to adequately consider the need to restore wolves as part of the long-term solution to the elk over-browsing problem, despite published scientific reports indicating that the presence of wolves has fomented a profound (and sustainable) recovery of vegetation within Yellowstone National Park (a few hundred miles to the north of Rocky Mountain National Park). The National Park Service is currently in litigation over the elk management plan, but the culling could proceed in advance of a court ruling (expected this spring).

Given the urgency of this matter, I exhort you to call for an immediate moratorium on the culling program so that the Administration may thoughtfully consider the implications of the program in light of: 1) the firearms ban, and; 2) the economic implications of elk culling, inasmuch as culling will not address the root issue of the absence of wolves. A delay of this nature is appropriate, and will not result in any irreparable harm to Park resources.

For the Wild,

Rob Edward,  
Carnivore Recovery Director  
WildEarth Guardians

Cc. Rep. Raúl Grijalva (D-AZ), Chairman of the Subcommittee on National Parks, Forests and Public Lands