

**Testimony by National Parks Conservation Association to the  
House Committee on Natural Resources and Outdoor Recreation Regarding the  
resolution to encourage the National Park Service to establish a moose tag lottery hunt to  
assist in controlling the moose population on Isle Royale, HR 154.**

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Members of the Committee. Thank you for the opportunity to provide written testimony about one of our nation's most prized treasures – Isle Royale National Park. This testimony is submitted on behalf of the National Parks Conservation Association (NPCA) and our 1.4 million members and supporters, including more than 38,000 here in Michigan. NPCA asks you to oppose HR 154, the resolution to encourage the National Park Service to establish a lottery hunt at Isle Royale, because the resolution is based on rationale that is either no longer valid or incorrect.

Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, including Michigan's five national parks, which collectively drive more than \$237 million in visitor spending and support nearly 3,400 jobs in the state.

We appreciate the intent behind this resolution and the support that its sponsors have of ensuring that Isle Royale National Park has a healthy landscape. NPCA shares this goal. That's why we have been a long-time advocate of restoring the wolf population at this iconic national park. The wolves at Isle Royale play a critical role as apex predator and are important in helping support a healthy ecosystem by keeping the moose population in check.

We are grateful to Governor Rick Snyder for initiating a partnership with the National Park Service that resulted in Michigan wolves being relocated to Isle Royale, and we are grateful to Governor Gretchen Whitmer for continuing that important partnership.

**Wolves ARE preying on moose:**

In the summer of 2019, as this resolution was being drafted, there was speculation about whether or not the relocated wolves were preying on moose and the resolution says that "...attempts to introduce additional wolves to balance out the moose-to-wolf ration have not resulted in a long-term sustainable balance of predator and prey." But we have proof since the resolution was introduced that wolves are indeed preying on moose.

Just last month, the Park Service and the State University of New York – College of Environmental Science and Forestry released a study that confirmed the new wolves are playing their role as predator. Using collar data, researchers found the remains of 60 prey, which included moose, beavers and snowshoe hares, but over half of the prey were moose. This confirms what scientists predicted — the new wolves are adjusting well and feeding on the moose. The research also found that the introduced wolves are hunting and traveling together, and they are forming groups, which will eventually lead to the formation of "wolf packs" once breeding begins. Researchers believe that wolves will continue to prey on more moose in the coming months.

**Hunting is not legal at Isle Royale National Park:**

The resolution's sponsors suggest that a moose tag lottery hunt would restore the ecological balance at Isle Royale. Although the resolution also suggests that hunting is practiced at

“approximately 40 other national parks,” it is prohibited by law at Isle Royale National Park and other National Parks. This is not the case at National Lakeshores, and indeed hunting is managed at Sleeping Bear Dunes National Lakeshore in accordance with state regulations.

In a few National Parks, there are instances where a managed cull takes place in order to control a species of wildlife. A cull occurs infrequently and generally involves a very small group of specialized sharpshooters managed by the National Park Service, and the culled animal is distributed through food banks or other channels determined by the Park Service.

#### **Culling was considered by the Park Service:**

The National Park Service undertook a thorough planning process starting in the summer of 2015 via an Environmental Impact Statement (EIS) to address the imbalance between the wolf and moose populations at the park.

The plan that was developed over several years used a thorough environmental analysis reliant on numerous internal and external experts in the fields of wildlife biology, plant life and natural resource management. Public input was considered at four different times during the process and hunting was suggested by some members of the public.

After careful consideration, the Park Service ruled out both public hunting and culling as options and said in their final Environmental Impact Statement: “During public scoping, some commenters advocated the use of hunting in the park to reduce the moose population... Public hunting would be inconsistent with existing laws, policies, and regulations for the park because *public hunting is not allowed by federal statutory law at the park*. The NPS is not considering a managed harvest because of *the difficulty related to logistics, increased staffing requirements, removal of carcasses from the landscape, and the impacts to wilderness character*... As a result, hunting and managed culling is dismissed from further consideration.”

#### **Conclusion:**

We acknowledge that the resolution’s sponsors clearly value Isle Royale and we are not opposed to hunting in the State of Michigan. It is just an inappropriate solution for a problem that is already being solved. In June 2018, after the Park Service adopted the final plan to introduce 20-30 wolves over a three-year period, they started the relocation efforts right away and now that plan is about halfway through implementation. It’s showing signs of success as the wolves are forming groups and preying on moose.

Isle Royale National Park is a special place, and an asset to the people of Michigan and to all Americans. We all want to ensure this national park stays healthy and its wildlife thrives. That’s why it is critical that we step back and allow the current wolf restoration plan to be fully implemented before we consider any other measures. Let the wolves do what they do best – hunt moose – and recognize that it will take some time for the wolf population to become sustainable and moose predation rates to increase.