



# ELK AND VEGETATION MANAGEMENT PLAN/ ENVIRONMENTAL IMPACT STATEMENT

## SUMMARY OF PUBLIC SCOPING COMMENTS AND THE DEVELOPMENT OF DRAFT MANAGEMENT ALTERNATIVES

### Summer 2004

I would like to update you on the Elk and Vegetation Management Plan / Environmental Impact Statement (EIS) efforts at Rocky Mountain National Park. As noted in the first newsletter, the elk population has more than tripled since 1969, and concentrations and migration patterns are also outside the range of variation under natural conditions. As a result, willow and aspen stands no longer regenerate effectively, depriving other wildlife of the food and habitat they need to survive. In addition, the increasing numbers of elk are causing property damage and safety concerns in Estes Park.

Recovering, to the extent possible, the natural range of variability in the elk population and affected plant communities requires identifying and implementing measures to maintain, restore, and protect the inherent integrity of natural resources. As lead agency, the National Park Service is cooperating with the Town of Estes Park, the Estes Valley Recreation and Park District, the Colorado Division of Wildlife, Grand County, Larimer County, the Town of Grand Lake, the U.S. Bureau of Reclamation, and the U.S. Forest Service to develop a 20 year plan to achieve this end. An Interagency EIS Team has defined the purpose, need, and objectives of the elk and vegetation management plan; formulated the issues involved in meeting the objectives, and developed a list of potential management tools that could be incorporated into the plan alternatives.

In summer and fall 2003, the National Park Service and partners released a newsletter and held a series of public workshops in Estes Park, Loveland, Boulder, and Grand Lake to determine the issues and concerns associated with managing elk and vegetation in and around the park. We have received over 1,100 comments from you, in writing or recorded at the workshops. We are grateful for your input, and took your comments into consideration in developing a reasonable range of alternatives to manage elk and vegetation. The team has developed five draft alternative concepts to meet the project objectives; this newsletter presents these concepts and one alternative that would continue the current management of elk and vegetation (No Action Alternative).

We would like your input on the five alternatives presented in this newsletter. To facilitate this process, four public workshops will be held in communities near the park. You can find specific dates and locations of these meetings on page 10 of this newsletter. Following this public scoping period, the alternatives will be further developed. With your comments, we can reevaluate the direction and scope of each alternative, modifying them as necessary. Next, all alternatives, including any modifications, will be presented and fully analyzed in a draft Environmental Impact Statement, which you will have an opportunity to review in the winter of 2005.

Again, I thank you for your contributions to date and for your interest in Rocky Mountain National Park. I encourage your continued involvement during the EIS process and look forward to your feedback on the draft alternatives presented in this newsletter and on the draft EIS when it becomes available for public review. Understanding the interests and priorities of you, the public, is an important part of the planning and environmental impact statement process. Your participation helps us produce an EIS that is complete, factual, and focused.

Vaughn L. Baker, Superintendent  
Rocky Mountain National Park

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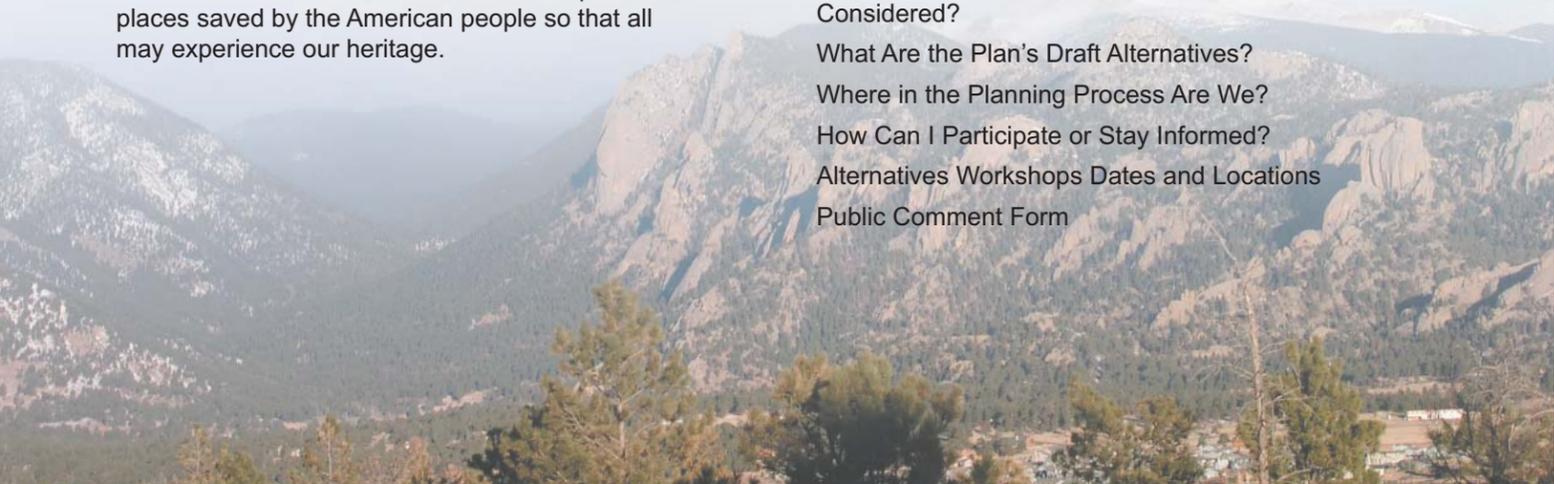
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The National Park Service cares for the special places saved by the American people so that all may experience our heritage.

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# What Were the Results of the Initial Phase of Public Scoping?

During the first phase of public scoping, which ended on October 10, 2003, we solicited your comments regarding the issues and potential management tools. Comments were received by letter, fax, and electronic mail; through the Internet; from public workshop results; on comment forms distributed via postal mail, and at visitor centers in the park. Collectively, they contained 1,137 comments.

The majority of the public agreed that there is a need for action regarding the management of elk and vegetation. However, there was a diversity of opinions expressed on how to achieve the management objectives.

The summer 2003 newsletter and the public scoping meetings in September 2003 presented a list of potential management tools (also presented in the alternatives section of this newsletter). Of the 1,137 comments received, 860 addressed some aspect of the potential management tools, including expressions of support or opposition for particular tools or actions. Figure 1 illustrates the distribution of comments across a range of topics. Figure 2 shows the relative degree of support and opposition for the potential management tools.



Goals of the scoping process included learning your issues and thoughts on the potential management tools and discovering tools that we had not previously considered. Most comments presented perspectives or approaches already identified, or discussed variations to previously identified issues and management tools. The following summary of your comments includes example comments received from the public.

*"The elk population needs to be controlled, please do something."*

*"Why don't you just let nature take its course?"*

*"In the absence of natural predators, measures must be taken to reduce the elk population."*

*"Educate people to understand that this area is habitat for elk and other animals."*

*"There has been strong scientific and visible evidence for many years that the population of elk in RMNP is too high."*

*"Elk are causing severe damage and change to the stream ecosystems, to the detriment of many songbirds and other species of plants and animals."*

*"Elk moving through our Estes Park neighborhood is one of the reasons we like living here. Residents have learned to live with the elk."*

*"I am concerned that high elk densities and, probably more importantly, altered movement patterns and unnatural concentrations are negatively affecting vegetation condition in RMNP. The altered habitat could have negative consequences on other species and ecological functions. I believe effective elk herd management is a critical need."*

*"I believe any elk or vegetation management should take a holistic approach to restoring an intact ecosystem within the park. I am interested in seeing more than a healthy elk herd and willow community. I would also like to see riparian habitat restored for beaver, birds, insects, etc. as the willow are critical in multiple food webs."*

*"Herding or hazing is unacceptable. We do not need to harass our wildlife - this seems to be a negative, not positive solution."*

*"Hazing should be available to field staff when they feel it's necessary and justified in managing the herds, vegetation, and citizen complaints."*

*"Use NPS staff and CDOW staff to cull elk, with meat being processed for needy people."*

*"Last resort: ranger-conducted hunting."*

*"Culling in or outside RMNP is not acceptable."*

*"The Park Service's mantra is predicated on natural or hands-off management style which, among other things, prohibits hunting in the Park."*

*"I think it would be good to open RMNP up to limited hunting during the regular Colorado hunting season."*

*"It has become obvious that wolf introduction and the sterilization of animals will cause problems and are not acceptable."*

*"The reintroduction of wolves in the park is both a sustainable option and one which restores the park to a more natural state."*

*"Do not introduce wolves! The impacts out of the park would destroy any credibility the Park Service has with residents of Estes Park, Allenspark and Larimer and Grand County. "*

*"Use fertility control methods."*

*"I hate the idea of putting up fences."*

*"I would emphasize and encourage use of selective fencing on key riparian and meadow habitats to hasten vegetation recovery as a key strategy."*

*"Reintroduction of beaver and beaver habitat will help the plant community."*



# Results of Initial Public Scoping

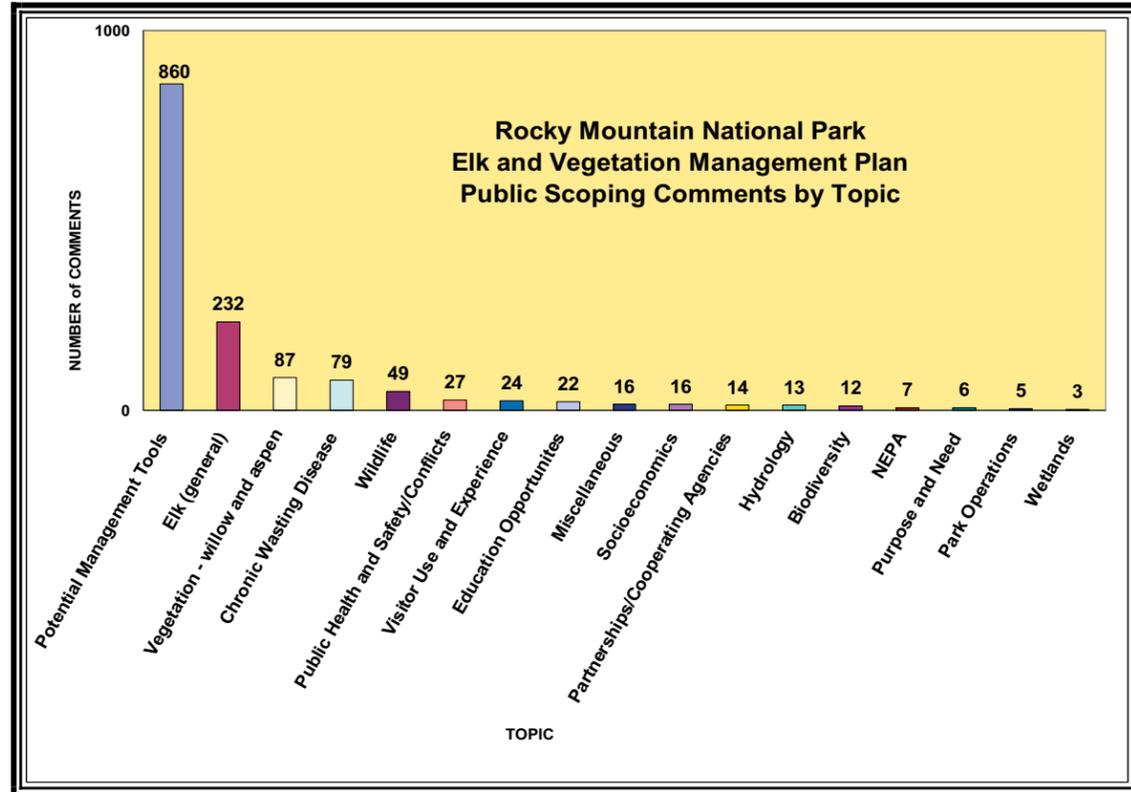


Figure 1: Distribution of public scoping comments across a range of topics.

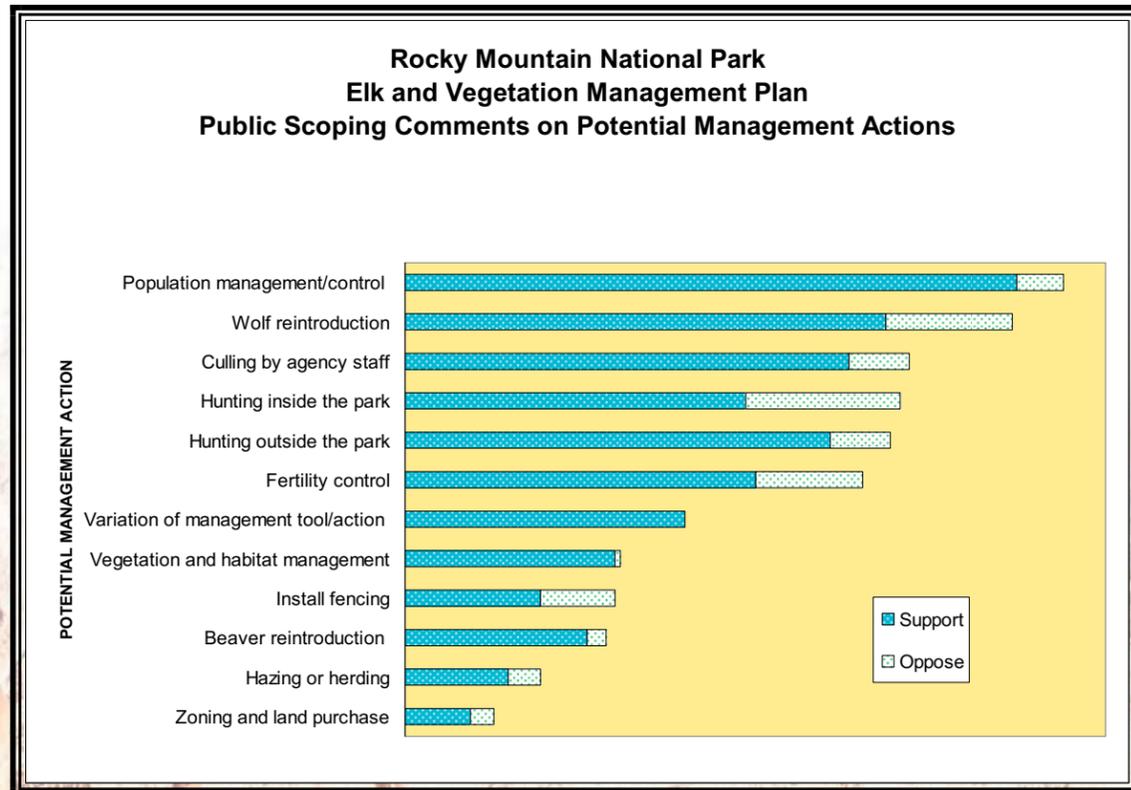


Figure 2: Relative degree of support and opposition for the potential management tools/actions.

# What Are the Plan's Objectives?

The plan's objectives form the basis for the development of alternatives to manage elk and vegetation. The objectives crafted by the Interagency EIS Team for this plan are as follows:

1. Address size and distribution of elk population.
  - a. Maintain a wild and free-roaming elk population.
  - b. Restore natural range of variability to the extent possible.
  - c. Develop specific commitments related to population size.
  - d. Reduce density and redistribute elk to reflect a more natural state, to the extent possible.
2. Restore the range of variation in vegetation conditions that would be expected under natural conditions in the park and at select sites outside the park, to the extent possible.
  - a. Make specific commitments regarding levels of herbivory.
  - b. Prevent loss of aspen clones from the core winter range until more information on the establishment of those clones is available.
3. Ensure that strategies and objectives of this plan/EIS are not in conflict with those of chronic wasting disease (CWD) management.
4. Opportunistically collect information to understand CWD prevalence within the framework of the plan.
5. Recognize the natural, social, cultural, and economic significance of the elk herd.
6. Coordinate the management of natural, social, cultural, and economic values of the affected agencies and tribes to the extent possible.
7. Reduce the risk elk pose to public safety to the extent practicable.
8. Address the risk of damage to private property by elk.
9. Provide recreational opportunities associated with elk, such as viewing or hunting.
- c. Restore and maintain sustainable willow stands, increasing willow cover within suitable willow habitat on the core winter range.
- d. Maintain sustainable upland shrub communities on the core winter range.

# What's New with the Plan's Objectives?

At the time public scoping was conducted during summer and fall 2003, the park planned to consider options for determining the prevalence of CWD in elk in Rocky Mountain National Park in a separate planning effort. Since that time, the Interagency EIS Team has decided to incorporate a new management objective into this plan to opportunistically collect information during elk population management efforts to contribute

to understanding CWD prevalence within the park. However, this plan will not evaluate alternatives for managing CWD. Instead, these opportunities to collect information on CWD prevalence in the park will complement the Colorado Division of Wildlife's efforts outside the park and, ultimately, give researchers and managers a better understanding of the distribution and extent of the disease.

# What Are the Possible Management Tools?

The management tools are the elements that comprise the alternatives. Initially, the Interagency EIS Team identified a set of management tools that could be used to manage elk and vegetation. From this set, different combinations of tools were chosen to form the draft alternatives. The set of management tools included:

1. Install fencing or other barriers.
2. Use herding or hazing or other aversion techniques to keep elk in or away from specified areas.
3. Use hunting outside of the park to reduce elk numbers and density.
4. Use culling by National Park Service (NPS) personnel inside the park and/or by Colorado Division of Wildlife (CDOW) personnel outside the park.
5. Use fertility control methods (contraceptives).
6. Reintroduce wolves to Rocky Mountain National Park.
7. Use vegetation and habitat management techniques such as prescribed burns, forest thinning, or planting willows.
8. Reintroduce beavers to elevate water tables and promote willow growth.
9. Use zoning and land use changes to help manage elk and vegetation outside the park.

Please consider these objectives and tools carefully, as we need you to be part of the informed public process that helps find the best ways to develop this plan.

## What Alternatives Will No Longer Be Considered?

During the development of the draft alternatives, three of the alternatives initially considered were not retained for further evaluation. These include: allowing traditional public hunting in the park, trapping and transplanting elk (translocation), and fencing large portions of the core winter range. The rationale for not further considering these alternatives is as follows:

**Hunting in the Park:** Federal law prohibits public hunting within the park. Allowing hunting in the park would therefore require authorization through congressional action.

If public hunting were to occur in the park, it would need to be safe for hunters and visitors, which would require limiting the use and access by the general public to areas open to hunting. A traditional public hunt could not be held for more than a short time, or over a large area of the park, without unduly restricting access for other visitors to the park. Such restricted access would be inconsistent with the Park's enabling legislation, which calls for the freest use for public recreation. The limited scope of hunting that could occur in the park would not reduce the elk population enough to fulfill the purpose and objectives of the plan.

Finally, public hunting duplicates other options. These options include shooting carried out by agency staff or by members of the public who qualify as proven marksmen and are accompanied by agency staff or contractors. These controlled culling operations would have safety elements built into the process, and would offer similar environmental advantages in restoring vegetation and returning the elk herd to a more natural size while minimizing the impacts on visitor use.

## What Are the Plan's Draft Alternatives?

Based on your input and considering the plan's objectives, the Interagency EIS Team has crafted a set of draft alternatives, presented here to solicit your review and comments. The Interagency EIS Team used information gathered during public scoping, data from past and ongoing research, and the input of numerous wildlife, natural, cultural, and social resource scientists and professionals to develop the draft alternatives. Please use the comment form included in this newsletter, or one of the other methods of commenting identified on page 10, to let us know how you feel about the draft alternatives that have been developed so far. Based on public input already received, we recognize that due to divergent views and opinions, it will be difficult to reach a consensus on how to manage elk and vegetation in and around the park.

The draft alternatives developed by the Interagency EIS Team include a description of current actions that are used to manage elk and vegetation in and out of

**Translocation:** This option to reduce the elk population would conflict with current NPS and state policies that prohibit exportation of elk from areas in which animals are known to be infected with CWD to areas not known to have animals infected with CWD. Although translocation has been used in the past by Rocky Mountain National Park and other NPS units to address elk overpopulation, the incidence of CWD in the elk herd makes "trapping and transporting" a potential hazard to wildlife, and public health and safety.

**Maximum Habitat Manipulation:** This alternative focused on fencing core winter range habitat in and out of the park. The goal was to eliminate large portions of the preferred elk foraging habitat to encourage elk to seek suitable forage in surrounding National Forest Service lands. Significant questions were raised about whether this alternative would successfully meet the objectives of the plan, as well as concerns that the problems and impacts associated with elk would be shifted to other areas (e.g., upland habitats in the park and other locations outside the park, including Carter Lake and Loveland). Specifically, questions about the desire or ability to fence the Estes Park 18 hole golf course and a lack of control over where elk would move limited this alternative's capability to achieve the plan's objectives. Elk displaced from habitat they currently use in and out of the park could intensify problems in areas that would remain unfenced. This alternative was not considered for further evaluation because it would likely shift the problem rather than solve it and not adequately achieve the plan's objectives.

the park (the No Action Alternative or Alternative A) and five action alternatives that use differing strategies involving different combinations of management tools to achieve the objectives of the elk and vegetation management plan.

*Please note that the numbers associated with population reductions presented in this document are the result of preliminary population modeling. They are presented here to illustrate the intensity of reduction that would need to occur inside and outside the park. These numbers are subject to change through additional modeling and scientific verification.*

### Alternative A – No Action or Continue Current Management

Under this alternative, the elk population would be expected to fluctuate between 2,200 and 3,100 elk. The No Action Alternative would continue to implement the following NPS management actions:

- Monitor elk population and vegetation conditions;
- Use repellents and/or fencing in selected locations;
- Conduct poaching patrols in the park; and
- Observe elk for signs of chronic wasting disease. Elk suspected of having contracted CWD would be selectively destroyed.

Continuing actions taken by other agencies would include:

- CDOW would manage elk outside the park in accordance with CWD policy;
- CDOW would manage elk outside the park consistent with CDOW herd management objectives as specified in individual herd management plans;
- Estes Valley Recreation and Park District would use aversion techniques and materials as needed;
- Local police would control people when elk are present in Estes Park;
- Larimer County would monitor and manage vegetation in coordination with the noxious weed program;
- Larimer County land-use zoning would help maintain elk migration corridors;
- Larimer County and the Town of Estes Park would enforce fencing ordinances to protect elk migration corridors;
- USFS would provide access to areas open to hunting in cooperation with the CDOW consistent with management objectives in the Forest Plan; and
- Vegetation management (prescribed burning and thinning) would be conducted on National Forest System lands under the USFS Accelerated Watershed/Vegetation Restoration Strategy now being implemented.

### Actions Common to All Action Alternatives (B through F)

Actions that would be common to all of the action alternatives (Alternatives B through F) would include:

- Adaptive Management: This approach would allow modification of management actions over time, within the framework of the selected alternative, and involves a cycle of monitoring, assessment, and decision making to allow managers to adjust strategies to better achieve the plan's objectives.
- Continued Hunting outside the Park: CDOW would use hunter harvest as much as possible to meet elk population objectives.
- Access Restriction: To protect public health and safety, public use may be restricted in selected locations within the park while management actions were occurring.
- Beaver Reintroduction: The beaver population in the park could be augmented after vegetation restoration was sufficient to support increased beaver herbivory.

- Monitoring: Elk population size, demographics, and distribution; vegetation conditions; visitor experience; beaver populations; and the potential for natural wolf recolonization would be monitored in addition to specific monitoring associated with particular alternatives.
- Enhanced Public Education: Public education efforts would increase to provide additional information about elk and their role in the ecosystem; how the management actions would affect elk, vegetation, other wildlife and visitors; and other topics relevant to the overall management of elk and vegetation.

### Alternative B – Maximum Lethal Reduction of Elk

Under this alternative, elk would be lethally removed by agency staff, with aggressive reduction targets initially, followed by less intensive reduction to maintain target populations.

- The targeted range of elk population for this alternative would be 1,200 to 1,700, comprised of 200 to 400 elk that winter in the park and 1,000 to 1,300 that winter outside the park.
- NPS staff would cull approximately 300 cow elk in the park each year for the first four years of the plan and 65 cow elk each year for the remaining 16 years of the plan, with a total of about 2,200 elk killed in the park over the life of the plan. Culling would occur in strategically selected locations to reduce elk densities and redistribute elk to protect vegetation.
- Outside the park, hunter harvest or additional CDOW actions such as culling would be used to achieve elk population objectives as necessary.
- Elk could be culled by shooting by agency staff, captured and euthanized, or transported to a slaughter facility. Agencies would cull elk between November and late February.

(Note: fencing to protect and restore large areas of vegetation would not be needed under this alternative.)

### Alternative C – Maximum Elk Fertility Control

This alternative involves the use of fertility control agents in the park to reduce the size of the elk herd to targeted levels, in combination with moderate levels of fencing to protect vegetation and promote restoration.

- The targeted range of population for this alternative would be 1,600 to 2,100, with 600 to 800 in the segment of the herd that winters in the park and 1,000 to 1,300 in the segment that winters outside the park.
- A multi-year reversible fertility control agent using a time-released compound to effectively inhibit reproduction in cow elk for multiple years (two, three, or possibly more years as formulations become available) would be used. Under this alternative option, approximately 400 elk would be

treated each year throughout the life of the plan. The treatment period would be mid-July to early September, when the majority of the elk are in the park. The control agent would require Federal Drug Administration (FDA) approval to allow consumption of the meat. Cow elk would need to be captured, treated, and permanently marked to avoid retreating previously treated cows.

- Up to 3,000 acres of fencing would be installed in the core winter range, Kawuneeche Valley, and alpine areas to protect aspen and willow. Fencing would remain in place for the life of the plan. Fencing could be applied outside the park to areas targeted for protection and restoration.
- Herding, hazing (e.g., rubber bullets, cracker shot, or other dispersal actions), and other aversion techniques would be used to ensure the movement of elk from the core winter range areas to traditional summer range areas in the park as needed, and to prevent excessive concentrations in unfenced areas.

**Alternative D – Wolf Reintroduction**

The NPS would reintroduce the gray wolf to Rocky Mountain National Park. This action would not entail a regional reintroduction; it would focus solely on reintroduction inside the park.

- Fourteen to 20 wolves would be reintroduced.
- Biologists believe that reintroduced wolves would disperse beyond the park boundaries.
- Conflicts between wolves and private land uses outside the park could occur. A fund to reimburse livestock owners for loss of livestock due to wolf predation could be established.
- At this time, it is uncertain how the elk population would respond to the presence of wolves. Further modeling and consultation with scientific experts is needed to estimate the effect of wolves on elk numbers and distribution. Full development and analysis of this alternative will be needed to predict the response of reintroduced wolves and corresponding response in elk.

(Note: fencing, herding, hazing, or other aversion techniques would not be used under this alternative.)

**Alternative E – Moderate Reduction of Elk Using Public Marksmen in the Park**

Alternative E relies on gradual lethal reduction over time to regulate the elk population and distribution. Inside the park, gradual reductions would be carried out under controlled conditions by members of the public who qualify as marksmen and are accompanied by NPS staff or contracted guides. Outside the park, hunter harvest and additional reductions implemented by CDOW, if needed, would be used to achieve the desired reduction target.

- The targeted range for the elk population would be

1,600 to 2,100, with 600 to 800 elk in the segment of the herd that winters in the park and 1,000 to 1,300 elk in the segment that winters outside the park.

- Members of the public could enter a drawing for the chance to remove elk from inside the park, accompanied by NPS staff or a contracted guide. These selected individuals would have to prove their ability to shoot at a defined “marksmen” level of skill.
- Approximately 70 cow elk would be removed in the park each year for 20 years. If the targeted number of elk are not removed by qualified public marksmen, NPS staff would shoot elk inside the park to reach the targeted population size.
- Outside the park, elk reductions would occur through hunter harvest and other CDOW actions, such as culling, as needed to reach target population levels.
- Culling activities would occur from November through February.
- Herding, hazing (e.g., rubber bullets, cracker shot, or other dispersal actions), and other aversion techniques would be used to ensure the movement of elk off the core winter range areas to traditional summer range areas in the park as needed, and to prevent excessive concentrations in unfenced areas.
- Up to 2,200 acres would be fenced to protect willow and aspen in the core winter range, the Kawuneeche Valley, and alpine areas. Fencing could be applied outside the park to areas targeted for protection and restoration of vegetation.

**Alternative F – Combination of Lethal Reduction and Fertility Control**

This alternative would focus on using a variety of management tools to meet the plan’s objectives and would maximize the flexibility to adjust the management methods used based on the results of monitoring. The agencies would cull a high number of elk in the first five years of the plan to reduce the population size and then use fertility control treatments inside the park to maintain the population size over the remaining years of the plan. If fertility control methods are not successful in maintaining the elk population (e.g., because of an inability to treat the necessary number of elk), the agencies would cull elk as needed. Elk redistribution techniques and herding would be emphasized in this alternative to reduce concentrations of elk on the core winter range and to provide further protection for vegetation. The use of fences would be minimized under this alternative to the extent possible.

- The targeted range of elk population under this alternative would be 1,400 to 1,900, with 400 to 600 in the segment of the herd that winters in the park and 1,000 to 1,300 in the segment that

winters outside the park.

- During the first five years of the plan, 140 elk would be shot each year by NPS staff inside the park (700 total over the life of the plan).
- Outside the park, elk reductions would occur through hunter harvest and other CDOW actions such as culling, as needed to reach target population levels.
- After the initial reduction phase, fertility control methods would be used inside the park to maintain the population level for the remaining 15 years of the plan. Fertility control options could include the use of a single-year or multi-year reversible control method. The treatment period would be mid-July to early September, when the majority of the population is inside the park.
- Herding, hazing (e.g., rubber bullets, cracker shot, or other dispersal actions), and other aversion techniques would be used to ensure the movement of elk off the core winter range areas to traditional summer range areas in the park as needed, and

to prevent excessive concentrations in unfenced areas.

If monitoring results indicate that objectives related to vegetation recovery are not being achieved, fences would be selectively installed on up to 2,200 acres on the core winter range, in the Kawuneeche Valley, and alpine areas. Fencing could be applied outside the park to areas targeted for protection and restoration of vegetation.

The planning team welcomes your suggestions regarding additional management approaches and alternatives. We will use your input to refine and fully develop the draft alternatives presented here. **Please focus on identifying approaches that would best meet the plan’s objectives (see page 5 for a list of the objectives), rather than describing why one or more of the alternatives or tools identified above would not be acceptable.**

## Where in the Planning Process Are We?

The table below summarizes the process for preparing the elk and vegetation management plan and your opportunities to participate. As you can see, we are making progress and welcome your participation and input.

You are invited to attend one of the public workshops that will be held in August. If you do not attend a meeting but want to contribute to scoping, you can send us written comments by September 13, 2004. You can also check for information and provide comments on our website at [www.nps.gov/romo/planning/elkvegetation](http://www.nps.gov/romo/planning/elkvegetation).

Planning Activity	Public Involvement Opportunity
FALL 2003 Initiate planning project and conduct scoping on issues and concerns.	Read the Summer 2003 newsletter and join the mailing list. Public meetings held in September 2003. Comments were solicited on the issues and concerns.
WINTER 2003/2004 SUMMER 2004 <b>WE ARE HERE</b> Develop draft alternatives. Conduct scoping on draft alternatives.	Review the draft alternatives presented in this newsletter. Review important background information on the Website. Attend public draft alternative workshops in August 2004. Provide comments on the draft alternatives.
WINTER 2004/2005 Publish the draft elk and vegetation management plan and EIS.	Become familiar with the draft plan by attending public meetings or by reading the draft plan or its summary. Provide oral or written comments at meetings, or comment via letter or our Website.
WINTER 2005/2006 Finalize plan and EIS.	

Based on your input and further discussions with the Interagency EIS Team, the alternatives for managing elk and vegetation inside and outside the park will be reevaluated and modified as necessary. The plan that is ultimately selected would be binding only on the National Park Service. Implementation of actions associated with the plan outside the park would be determined by the respective jurisdictional agencies. The alternatives, as modified by this segment of the planning process, will be presented and fully analyzed in a draft environmental impact statement (DEIS), which will be available in winter 2005. If you are on our mailing list, you will receive a copy of the DEIS, at which time we will ask for your input and invite you to attend public workshops to discuss the plan and DEIS.







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