

July 28, 2020

**To: Wisconsin Natural Resources Board Members**

c/o Laurie J. Ross, Board Liaison  
Office of the Secretary, Wisconsin DNR  
PO Box 7921  
Madison WI 53707-7921

**Re: Special NRB Meeting Agenda Item 2.A – 2020 Antlerless Deer Quotas & Hunting Seasons**

Wisconsin's Green Fire (WGF) applauds your decision to hold a special NRB meeting to address public concerns that arose following the NRB action of June 24<sup>th</sup> establishing the 2020 antlerless deer quotas and hunting seasons. You are Wisconsin's most visible trustee of our natural resources and this action demonstrates that you have heard these concerns and want to take the time to discuss if further action is needed.

**WGF recommends that:**

- 1) NRB members vote to support reconsideration of the NRB's June 24th decision; and**
- 2) NRB members approve the Department's recommendations for the 2020 antlerless deer quotas and seasons.**

Reconsideration – We believe reconsideration of the NRB's June 24<sup>th</sup> action is warranted based upon the following:

- **There was inadequate time for all NRB members and Department staff to review the amendment and supporting analysis drafted by NRB member Kazmierski prior to the June 24<sup>th</sup> meeting.** NRB members Smith and Anderson, as well as Department staff did not receive these documents until the evening before the meeting. NRB member West did not receive the documents until the start of the meeting. This did not allow the impacted Board members and Department to conduct public consultation or analysis of the significant impacts that would result from these amendments.

- The 11 County Deer Advisory Councils (CDACs) affected by the amendment approved by the NRB did not have an opportunity to provide feedback to the Department or NRB regarding the proposed changes. The volunteer members of the CDACs spent many hours developing the recommendations and considering the public feedback on them. They deserve an opportunity to comment on the NRB's changes, just as they do when the Department proposes changes to CDAC recommendations.
- For several counties, the supporting analysis for the amendment incorrectly included public survey data from 2019 instead of 2020. For Douglas County, the 2020 public survey data actually showed support for the CDAC's recommendation to increase the quota and permit levels in their county. Reconsideration will allow the NRB to make a decision based on more accurate information.

**Holiday Hunt** – The Department's recommendations for the 2020 antlerless deer quotas and seasons mirrors those of Wisconsin's 72 CDACs with two exceptions. We believe they strike the right balance of honoring the local CDAC involvement and requesting modification only when they are justified. In fact, since 2015 when the current CDAC process was instituted, the Department has recommended only 9 changes to the approximately 1,000 CDAC recommendations on quotas, permits, and seasons. That is an astounding 99% percent level of agreement between the CDAC's and the Department.

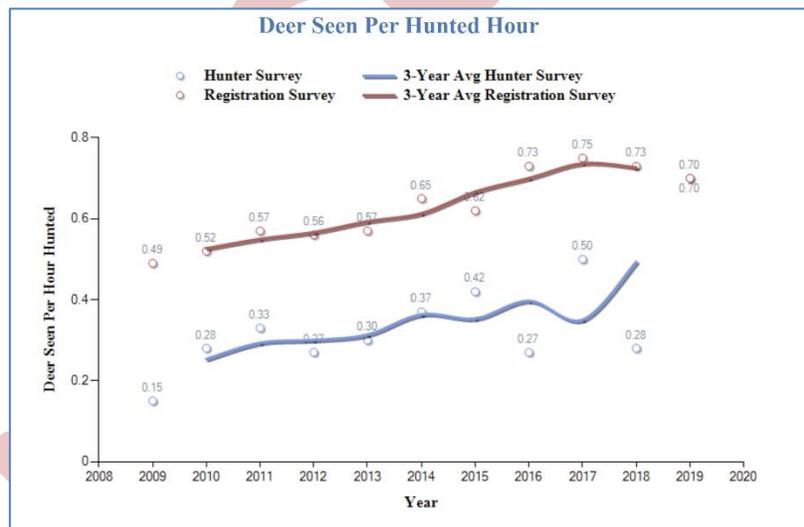
This year's requested modifications for adding a Holiday Hunt season in Grant and Marquette counties is well justified. In both counties, large deer herds are causing agricultural damage that exceeds the intolerable damage threshold established by the NRB in NR 1.15(2). The Department was directed to develop this standard by the legislature due to strong concerns about the impact of high levels of deer damage to Wisconsin's farmers. Farm bankruptcies have been at record levels in recent years due to a variety of market disruptions. **The NRB should strongly consider doing what it can to reduce the burden caused by overabundant deer populations.**

In both Grant and Marquette Counties, the antlerless deer harvests from recent deer seasons have fallen short of desired levels. Within current law, the only available option to increase antlerless harvests is to authorize a Holiday Hunt for these counties. Experience with Holiday Hunts from neighboring counties offer strong evidence that such a hunt will increase the antlerless deer harvest in these two counties as well. In addition, during years with adequate snow for snowmobiling, there have been no conflicts reported between Holiday Hunt deer hunters and snowmobilers. There is no need for CDACs or the NRB to choose one activity over another.

**Northern Forest Quotas/Permits** The 2020 deer quotas and permit levels recommended by the CDACs, and endorsed by the department, in Wisconsin’s northern forest counties should be supported. Public demand, as evidenced by the lack of leftover permits, shows there is a consistent desire by hunters for additional harvest opportunities. Further, **the northern forest CDACs together with department staff examined the deer herd population data and determined that their harvest recommendations were biologically sound and consistent with the established population objectives.** We support their conclusions.

Deer populations across these counties have been trending upward over the last 6 years. The decreased post-hunt

population estimates for 2020 are significantly impacted by the poor hunting conditions and late calendar of the 2019-gun deer season. Available evidence clearly suggests that the actual deer herd size is similar to 2019 levels. The CDACs have already taken a conservative approach to antlerless harvest recommendations and there is not a need for further



adjustment by the NRB. We also wanted to note, that like deer herd size, sighting of deer by hunters have also been trending upward in these same counties. The attached Marinette County graph, taken from DNR’s deer metrics webpages, shows this upward trend. While there is variation the slope of line among the counties, they all show an upward trend.

**Contrary to NRB member Kazmierski’s assertion that there is no hard data on the impact of deer browsing, published Wisconsin studies demonstrate there is ample and growing evidence that deer have, and are, negatively impacting the composition of tree species in our northern forest counties and are creating long term damage to forest productivity.** In addition to the undesirable ecological and economic consequences of high deer populations, the decreased availability of tree species that are preferred by deer spells long-term trouble for the next generation of northern forest deer hunters. As tree species shift to less palatable species, the ability of our northern forests to sustain deer herds through the winter decreases and negatively impacts annual fawn production.

I've included below an abstract from the 2016 research paper published by Lauren Bradshaw and Donald Waller that describes the systemic impacts deer are having in northern Wisconsin. They examined the data collected from 1983 through 2013 from over 13,000 forest inventory and analysis plots. We encourage the NRB to review this paper and perhaps schedule some informational briefings to further explore this issue.

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## Forest Ecology and Management

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### Impacts of white-tailed deer on regional patterns of forest tree recruitment

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#### ABSTRACT

Local, short- to medium-term studies make clear that white-tailed deer can greatly suppress tree growth and survival in palatable tree species. To assess how deer have broadly affected patterns of tree recruitment across northern Wisconsin, we analyzed recruitment success in 11 common tree species that vary in palatability across 13,105 USFS - FIA plots sampled between 1983 and 2013. We also examined how recruitment in these species covaried with estimated deer densities here. Saplings of five palatable species were scarce relative to less palatable species and showed highly skewed distributions. Scarcity and skew provide reliable signals of deer impacts even when deer have severely reduced recruitment and/or no reliable deer density data are available. Deer densities ranged from 2.3 to 23 deer per km<sup>2</sup> over a 30 year period. Sapling numbers in two maples (*Acer*) and aspen (*Populus*) with intermediate palatability declined sharply in apparent response to higher deer density. Path analysis also reveals that deer act to cumulatively depress sapling recruitment in these species over successive decades. Together, these approaches show that deer have strongly depressed sapling recruitment in all taxa except *Abies* and *Picea*. As these impacts are now propagating into larger sized trees, deer are also altering canopy composition and dynamics. The tools developed here provide efficient and reliable indicators for monitoring deer impacts on forest tree recruitment using consistent data collected by public agencies.

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## Preparing for the 2021 Seasons

Beyond the action in front of you this morning, we encourage you to consider the most critical issues facing our deer herd today.

From a historical perspective, Wisconsin's deer herd has grown significantly over the past 6 years and is at record levels, especially across the farmland deer management zones. As we have done in 2018 and 2019, we urge the Board and Department to enact herd control strategies that can be used a year from now. Additionally, we recommend working with the legislature to remove existing statutory constraints to season modifications that would allow moving herds to desired population objectives. **The slow, but steady, decline in deer hunter numbers as the baby boomer demographic ages out of active hunting also erodes our harvest capacity and will only make the already difficult job of deer management harder.** This adds emphasis on the need for effective season structures.

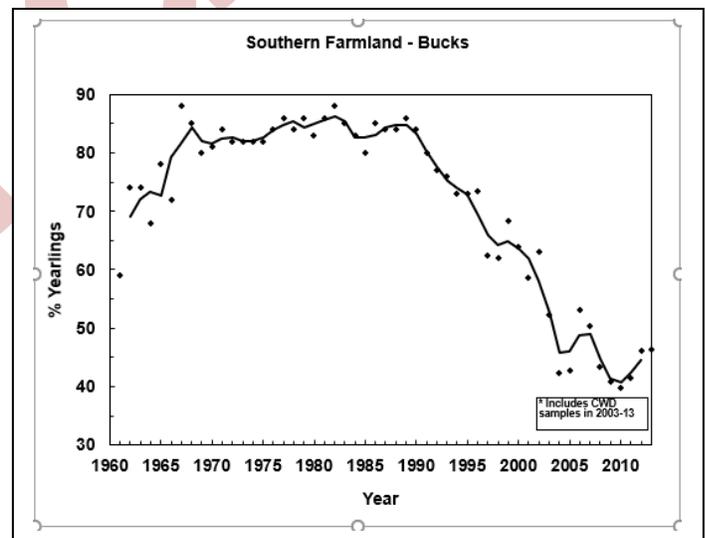
A profoundly serious concern is the relationship between large deer herds and Wisconsin's struggle with chronic wasting disease (CWD). CWD is now found, and steadily increasing in prevalence, in wild herds in 29 Wisconsin counties, and in captive herds in another 9 counties (for a total of 38 of 72 Wisconsin counties, or nearly 53%). It appears that CWD will ultimately infect deer herd statewide in 10-20 years unless further steps are taken. All indications are that even before that time, possibly within 3-5 years, negative population impacts will be documented in southwest Wisconsin. Beyond southwest Wisconsin, we are likely to see a steady progression of population impacts in other areas within 25 years following the first discovery of CWD in a county. Large deer herds make CWD management more challenging. Infected deer have a much greater likelihood of contacting uninfected deer and spreading the disease.

Managing CWD prevalence – There is no greater challenge to the health of Wisconsin's deer herd and deer hunting heritage than Chronic Wasting Disease. Wisconsin led the nation in CWD+ deer detections last year. The graphs on the following pages depict the change in CWD prevalence in northern Iowa County, southwest Sauk County and southeast Richland County. These graphs should be of great concern to everyone who cares about our deer resource whether hunters or non-hunters. Of further concern is the graphs from other areas of Wisconsin's CWD infected areas are all showing upward trends.

Wisconsin lacks a strategy for reducing CWD prevalence. Within DMUs with established CWD infections, our actions amount to taking the patient's temperature (CWD prevalence) without treating the underlying disease processes. The best management practices approved by the Association of Fish and Wildlife Agencies in 2018 include the following set of actions:

*Managing CWD Prevalence should include utilizing harvest, sharpshooters or other removal mechanisms combined with statistically appropriate sampling and testing to monitor changes in prevalence. Strategies may include: 1. Targeting the portion of the population most likely to have CWD. 2. Targeting animals in known CWD hotspots. 3. Adjusting timing to most effectively remove infected animals. 4. Reducing cervid density in CWD-positive areas with high animal density. 5. Eliminating practices that promote artificial cervid concentrations to minimize environmental contamination. 6. Utilizing a coordinated, adaptive management approach that allows evaluation of experimental CWD suppression strategies whereby the data gathered from these efforts would be used to develop improved strategies. 7. Restricting or prohibiting intact carcass and high-risk material transport out of CWD management zones.*

One strategy the NRB and department should consider is season changes that increase the rate of harvest of bucks in the heavily CWD infected areas. Adult and yearling bucks are the most heavily infected portion of the population. We also know that yearling bucks are the most likely class of the deer herd to disperse and spread CWD to uninfected areas. As the attached graph shows, yearling buck harvest is significantly lower today than in the past. Creating opportunities for hunters to increase their harvest of bucks in heavily infected areas is a best management practice Wisconsin should be implementing.



Wisconsin's Green Fire members have a significant amount of career experience in deer management and research in Wisconsin and we stand ready to provide more information or historical context to any of you as NRB members upon request. My contact information is below.

Thank you for consideration of our comments.

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Larry Bonde – Chair, Wisconsin Conservation Congress

**Wisconsin's Green Fire is a statewide organization dedicated to supporting our conservation legacy by promoting science-based management of natural resources. Our members include career natural resource professionals and scientists from a variety of disciplines throughout Wisconsin. For more information, visit <https://wigreenfire.org/>.**

