

April 6, 2015

Wildlife Division  
N.H. Fish and Game Department  
11 Hazen Drive  
Concord, NH 03301

Re: Comment on 2015 Draft Game Management Plan - White-Tailed Deer

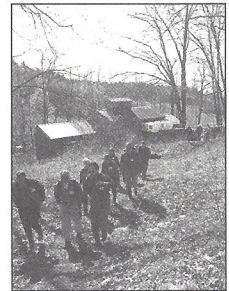
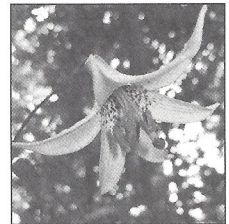
Dear Friends:

The Upper Valley Land Trust has reviewed the species assessments and draft game management plans prepared by NHFG for the ten year period beginning 2015. We ask you to consider our comments herein.

**General Comments:**

The Upper Valley Land Trust is a non-profit land conservancy working in 45 towns in the Connecticut River Valley of New Hampshire and Vermont. We hold conservation easements encompassing over 45,000 acres of forest and farmland and natural areas, much of it privately-owned land. Because our conservation easements are intended to offer permanent protection of land resources, we think of stewardship in a very long-term context. We understand that the draft plan you have created is intended to cover only ten years. We also realize that some of the goals and strategies within your plan will have the potential to shape the health of our landscape in very profound ways, for years to come.

For instance, the species assessment for white-tailed deer includes a reference to climate change impacts on deer habitat, noting that the impacts during the ten year period are projected to be minimal and are thus not a significant consideration in the plan. However, the impacts of climate change are already being seen in frequency of severe weather events, and in indicators of forest health including pests and invasive species. Though these changes may have minimal impact on deer in the short-term, the fact that deer may be more resilient than other species must be considered, because as the ability of the landscape to support other species becomes compromised, deer will have an outsized impact. Over a longer period of years, as forest composition shifts in response to climate change, what role will white-tailed deer play in steering forest regeneration? Are there parts of the state where deer populations will negatively impact successful adaptation?



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19 Buck Road  
Hanover, NH 03755  
603.643.6626  
[www.UVLT.org](http://www.UVLT.org)

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The species assessment considers highly fragmented, suburbanizing land as unsuitable deer habitat. However, it is those very areas in other parts of New England that have extraordinary deer densities that are damaging the forest and are now hard to reduce by any method. While severe winters may have some mitigating effect in New Hampshire, more integration between managing hunting, assessing habitat conversion and accounting for deer populations in suburban areas could help our state develop approaches that are effective in a fragmenting landscape and avoid some of the problems other areas have experienced.

We do understand that the purpose of the game management plan is to establish parameters for managing hunting based on desired populations of game species; it's not intended to be a statewide habitat stewardship plan. However, because hunting is really the only way that deer populations are controlled, and because deer have such a significant role in the environment, we think it is appropriate that the plan should identify some of the areas of long-term risk, and support programs and policies that more closely integrate game management with forest health and habitat stewardship.

Finally, we would like to offer perspective on the concerns you have heard expressed from Hanover residents. We realize that there have been some areas in Hanover where deer hunting has not been allowed and that has contributed to some serious problems which are now difficult to address. The public meeting in Claremont was attended by a number of Hanover residents. Deer impacts in the Upper Valley are being seen in many other towns and in places where hunting has traditionally been allowed: Lebanon and Lyme, New Hampshire and Bradford, Vermont. On conserved lands throughout our region, landowners are confronted by deer impacts following timber harvests. Foresters share photos and anecdotes about how heavy populations of deer are affecting regeneration. We hope that you will take these concerns seriously and support efforts to comprehensively monitor deer impacts.

**Goal One: NH will regionally manage white-tailed deer populations by balancing and incorporating social, economic, ecological and public safety factors using the best available science/knowledge.**

*UVLT comment:* We agree with this goal statement, but would like to see the strategy for implementation explained more explicitly. For instance, healthy forests are a vital part of the New Hampshire's economy. It is troubling to observe that there are areas in our region where dominance by invasive species like buckthorn is now the norm following timber harvest, and this is changing the calculus of forest stewardship. The structure of our forests could potentially be lost. Interrupting and changing forest cycles introduces greater risk to systems that are already at stress from climate change and fragmentation. We see no evidence that the plan contemplates monitoring forest health and regeneration as a component in setting regional rules.

Generally, in UVLT's service area (the Connecticut River Valley and foothills) we believe that white-tail deer populations are already in excess of what is desirable based on economic, ecological and public safety considerations. Parts of this landscape have been substantially fragmented and now provide "refuges" for deer because human development precludes

hunting as a population management strategy. Deer are common in our villages and along roadways where safety zones protect them. Invasive species and pests are profoundly altering the remaining habitat.

How exactly will NHFG incorporate the “best available science/knowledge,” when its newly completed assessment (upon which these goals are based) states: “The detailed analyses associated with vegetative species composition, stand size class distribution, estimated browse productivity and associated impacts on habitat quality are beyond the scope of this effort.”

We would like to see the plan include a specific mandate for NHFG to seek and act on scientific information, and to respond swiftly, in concert with landowners and local officials, to reduce localized deer populations when evidence indicates that forest health, ecosystem functions or public health is negatively impacted.

**Goal Two: NH deer will be managed at levels within the carrying capacity of suitable habitat without supplemental feeding programs, while maintaining animal and plant biodiversity.**

*UVLT suggested revision:* NH deer will be managed ~~at levels within the carrying~~ to maintain the capacity of ~~suitable habitat~~ the landscape to support healthy, ~~while maintaining~~ animal and plant biodiversity without supplemental feeding programs.

*UVLT comment:* The species assessment considers habitat quantity rather than quality, explaining, “Quantitative assessment of deer habitat availability and quality in New Hampshire is rather difficult given the lack of good historical information and the fact that deer tend to be rather general in their habitat requirements...” In fact, the assessment characterizes approximately 90% of NH’s landscape as being suitable habitat for white-tailed deer.

The assessment also states: “As New Hampshire’s wildlife habitat is lost to development, the potential for deer overpopulation to occur becomes increasingly likely as regulated hunting becomes potentially less effective as a management tool due to decreasing participation and access. The long-term costs associated with deer overpopulation can be ecologically and economically expensive as habitat for a variety of species is degraded and the costs associated with nuisance issues and damage mitigation increase.”

Nevertheless, the NHFG estimate of the desired deer population as expressed in the management plan is based on our landscape’s biological carrying capacity for deer -- the amount of suitable habitat for deer. This is unwise. The assessment indicates that deer is a particularly adaptive species. The quality of habitat that is sustainable for deer may not be sustainable for other species (plants and animals).

Revising Goal Two as suggested makes explicit the State’s commitment to sustaining habitat quality, as determined by the health of a whole suite of species. Such a statement will be more clearly supportive of public and private efforts to assess ecological trends and develop programs and policies that integrate game management with habitat stewardship.

**Goal Three: The New Hampshire Fish and Game Department will work alone and in partnership with state, federal, and public and private partners to minimize the loss of important deer habitat.**

***UVLT Suggested revision:*** The New Hampshire Fish and Game Department, ~~will work alone and~~ in partnership with state, federal, and public and private partners, will support policies and practices, as well as work directly, to minimize the loss of important deer habitat, *maintain forest health and high quality habitat for biodiversity, and educate the public about ecological sustainability related to deer populations.*

***UVLT Comment:*** It has been stated that white-tailed deer have a special place in the hearts and minds of NH residents, and these human preferences drive a tendency for deer populations that are not biologically desirable. The well-being of the State of NH depends in large part on its landscape, especially its forests. The Game Management Plan has potentially serious implications for New Hampshire forests and wildlife habitat because of white-tail deer.

The plan recognizes that NH has lower overall densities of deer than many other parts of the United States, and attributes that to our inhospitable climate and soils. However, our State's relatively lower level of suburbanization could also be a contributing factor. Increasing fragmentation not only degrades habitat for all species, it also provides refuge for deer. It is crucial for the public to understand that the sole method of managing the deer population is hunting. NHFG must play a vital role in helping the public learn to recognize the signs and consequences of an unsustainable situation and how to respond to protect the environment we all depend on.

Thank you for your consideration,



Jeanie McIntyre  
President