



Uniting Citizens to Conserve, Protect and Enhance Michigan's Natural Resources and Outdoor Heritage
PO Box 30235 Lansing, MI 48909 | 800.777.6720 P | www.mucc.org

July 8, 2020

RE: Deer Regulations & NRC Transparency

Dear DNR Director Eichinger & Natural Resource Commissioners,

Michigan United Conservation Clubs (MUCC) is a 501(c)3 conservation organization representing more than 200 affiliate clubs and 40,000 members in Michigan. Founded in 1937, our mission is to unite citizens to conserve, protect and enhance Michigan's natural resources and outdoor heritage. MUCC's membership is a diverse collection of organizations and individual members whose passions involve conservation of fisheries, wildlife and natural resources, as well as the promotion of hunting, fishing and trapping activities.

I am writing to you today on behalf of MUCC and its members to express our concerns with the method by which deer hunting regulations and other Natural Resource Commission (NRC) matters have been facilitated. MUCC is concerned with the lack of transparency and inability for public comment on a number of regulations that may be acted upon at the July NRC meeting.

At the June 2020 NRC meeting, three commissioners proposed amendments to the DNR recommendations for the Wildlife Conservation Order (WCO) Amendment No. 6 of 2020 (deer regulations). As MUCC understands it, these commissioners requested to receive feedback from the department and incorporate possible changes to the WCO before acting on these amendments in July. While one of these changes was made via a formal motion and was incorporated into the July meeting agenda (removing hunter orange requirements on occupied ground blinds; Nyberg), a number of changes requested by commissioners Tracy and Creagh were not incorporated into the WCO memo for public review, scrutiny and comment. Importantly, it is a very real possibility that these suggestions could be acted upon at next week's meeting without formal review by the department or the chance for members of the public to weigh in.

These suggested, verbal amendments to the WCO were offered at the June meeting:

- Revising combination license rules statewide (except for Drummond Island), to allow any legal buck to be harvested with the unrestricted tag and a consistent antler point restriction (APR) on the restricted tag (Tracy);
- (If the first amendment doesn't pass) Removing the APR on the unrestricted tag of the combination license in the Upper Peninsula (Tracy);
- (If the first amendment doesn't pass) Removing the four-point antler point restriction on the restricted tag of the combination license in the CWD management zone (Tracy);
- Allowing baiting prior to the start of the Independence Hunt and only during this select season, consistent with the rules for the Liberty Hunt (Tracy)
- Allowing the use of crossbows in December in the UP (Tracy)
- Addressing carcass movement restrictions per recommendations from Erik Schnelle of QDMA (Tracy);
- Suspending changes to APRs until the current APR study is complete (resolution; Tracy)
- Clarifying muzzleloader season restrictions to have a season in all areas of the state where hunters may exclusively use muzzleloaders (Creagh)

While a citizen could listen to a recording of the meeting to find these amendments, it is MUCC's understanding that they are only compiled in writing within our own internal report on the June NRC meeting. MUCC believes the state has an obligation to provide these amendments to its citizens in writing.

To make this process more transparent, MUCC would request that draft minutes from previous NRC meetings be available to members of the public prior to the following month's meeting as an attachment (link) within the agenda for said meeting (e.g. the July NRC agenda would include draft meeting minutes from the June NRC meeting). This would allow individuals to see what motions and amendments might be made to a WCO.

In the same vein, commissioners requesting that the department provide information on, or "look into" amendments to, a WCO should do so in the form of a formal motion so that it is reflected in the minutes. Suggested amendments could then be included in a WCO memo as "alternative options" so that they might be reviewed by both the department and the public prior to a formal vote before the NRC.

We would also like to formally request the information, be it internal DNR reports or the scientific literature, used to formulate the DNR recommendations be cited in the WCO. This memo should include more comprehensive scientific data regarding Deer Management Unit (DMU) level population dynamics, special permit trends, deer-vehicle collisions, habitat conditions and the forecasted impacts of regulation or quota changes. It would also be helpful to publish the results of the deer hunter survey that was conducted regarding these deer regulations and ensure that these results are received by all relevant parties. We would request the same be done with the complete annual deer survey, parts of which were presented at the June NRC meeting.

Finally, we support the recording of the minutes of the NRC Policy Committee on Wildlife and Fisheries when motions are made and that they be provided to the full board of the NRC as a further measure towards greater public transparency.

It is our belief that the addition of these few simple processes would greatly clarify the regulation process and increase trust and communication between stakeholders, the NRC and the DNR. Michigan hunters and anglers are entitled to a transparent view of the processes that govern them. When amendments are presented and acted upon in the eleventh hour, the public trust in this process wanes.

We look forward to working with the DNR and the NRC moving forward to continue to improve the processes by which we incorporate the best available science into wildlife management and improve government transparency.



Amy Trotter, Executive Director

CC:

Michigan Department of Natural Resources Deputy Director Shannon Hanna

Michigan Department of Natural Resources Legislative and Legal Affairs Director Trevor VanDyke