



Uniting Citizens to Conserve, Protect and Enhance Michigan's Natural Resources and Outdoor Heritage  
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Good afternoon, Commissioners,

I was fortunate to have served on the Upper Peninsula DMI, and our CEO Amy Trotter on the Lower Peninsula DMI representing Michigan United Conservation Clubs, our 40,000 members and 200 member clubs. I would like to begin with comments on the process.

The presentations provided by the DNR were exceptional, providing a solid common knowledge base to begin our work. The members and department worked together extremely well, everyone participated and were largely respectful of the process and one another.

My only criticism was the timeframe that the work was squished into. We were working to solve big issues on an extremely tight deadline that was too fast to get the information we wanted and too fast to do the process and the proposals justice.

I feel, given more time and with a little more patience, the DMI could have provided a more robust cohesive regulatory proposal, and that the process was rushed to give the appearance of “doing something” ahead of this coming deer season.

Now onto the actual regulatory items.

First, Lower Peninsula Item #2, reinstating baiting in counties where disease has not been detected.

MUCC, through our member's grassroots policies, opposes the baiting of deer in the lower peninsula because of the concern for disease transmission. This has been the consistent position of our membership since 2007.

This is not an ethical or fair chase dilemma for MUCC's membership, in fact we fully support bear baiting as a method of take. This is simply about mitigating, to whatever extent possible, human facilitated transmission of bTB and CWD.

While there have been many opportunities over the last 17 years to reconsider this position, it has not been done because the health of the deer herd is important to MUCC members and have decided that the risk outweighs the benefit.

Our members oppose these additional items as well:

#### UP Item 4: Deer Management Assistance Permits Only Available in Southern DMUs

MUCC has a policy allowing a landowner to seek additional means of harvesting excess deer when causing crop damage. The policy reads: MUCC will seek landowner permits or other means of increasing deer harvest in areas where surplus deer population has caused crop damage to private property.

The DMAP applications are vetted by the department and factored into the management plan.

MUCC would prefer a method where licensed hunters could be the facilitators of harvest on private land, and we are still open to looking for those opportunities, but to-date, no such matchmaking program has ever proven successful.

#### UP Item 7: Bear Season Date Changes.

MUCC holds the position that a more appropriate recommendation may be to request a representative of deer hunting join the bear forum as a member, and the DMI requests that the bear forum revisit the bear management plan in the UP with deer management as a consideration.

MUCC has a policy to seek consensus at the bear forum. Should the bear forum and department adopt these proposals, MUCC would have no issue supporting them.

#### LP Item 4: One Antlered Deer Limit

MUCC has concerns about this regulation as a standalone item. Our policy is to support the current flexibility on a combination tag that allows 2 bucks, 2 does or a combination.

Our policy reads: MUCC will work with the DNR and NRC to change the following: 1) The current definition of a combo tag to read valid for the take of one buck and one doe or two bucks with any legal method; 2) To continue to allow a combo buck tag option in areas that would otherwise not allow the take of a doe with any means (such as archery); 3) To make available in all other areas either the new combo or single buck tag; 4) To maintain hunter-supported additional requirements in DMUs that have supported such (such as APRs); 5) In areas of special management needs such as disease or high-density areas additional tags can be made available per DNR recommendations or mandates.

We support keeping the current combination tag and suggest reconsidering this change with Earn-A-Second buck, after legislative authority is gained, as a more comprehensive regulatory package. MUCC would likely be neutral. But as it stands this regulation constitutes a restriction of opportunity and takes flexibility away from hunters.

#### UP Item 6 & LP Item 6: Antlerless bag limits

The proposal to lower the bag limits for universal antlerless tags from ten to five in certain parts of the state represents a restriction of opportunity and unnecessary complexity of regulation for no significant biological impact. Based on 2023 data provided by the department, the number of hunters registering six or more deer was only 606 across the entire state.

So long as the department's data continues to show no evidence of a declining deer herd, we should retain the liberal antlerless harvest structure we have in the lower peninsula and southern parts of the upper.

Lowering the bag limits across large swathes of the state takes away a valuable tool to individuals who live in pockets of the state where doe reduction may be necessary.

MUCC and our members support the following proposals.

UP Item 1: Year-round coyote season.

Our support for this proposal is well noted.

UP Item 8: UP Wide Wolf Hunting and Trapping Season when available.

It continues to be MUCC's policy that, upon return of state management, the commission should authorize a UP wide hunting and trapping season.

UP Item 9: Revisit Regulations Every Three Years

This is our traditional regulatory cycle. Aside from certain emergency situations, there needs to be some consistency in regulations.

UP Item 10: Promote Hunters Safety in Schools.

Hunters and firearms safety programs provide safe, controlled introductions to Michigan's outdoor heritage and create the next generation of conservationists. This item is not under NRC authority but should be supported by the DNR and NRC and implemented to continue Michigan's outdoor heritage.

LP Item 1: Early and Late Antlerless Firearm Seasons Open to Public and Private Land

MUCC has policy supporting increased doe harvest using methods including later seasons. This proposal constitutes an expansion of opportunity with no added cost to the resource.

LP Item 5: Expand the urban archery deer season to include Huron, Kent, Lapeer, Sanilac, St. Clair, Tuscola, and Washtenaw Counties.

MUCC conceptually supports the expansion of the urban deer management hunt. Our grassroots policy is to adopt a statewide Urban Deer Management Plan emphasizing archery hunting and venison donation. Our policy does not dictate specific counties or municipalities. We should note that there will be concern by some hunters over continuing to expand deer hunting seasons into what is traditionally small game and predator hunting season as there is the potential for the loss of access to private lands for those other pursuits.

LP Item 10: Promote and Expand the Hunting Access Program.

This item is also not under NRC purview; however, it is important to mention as a significant barrier to entry for potential hunters is adequate land access.

Lacking specific policy on the remainder of proposals MUCC remains neutral. But a couple are worth addressing specifically.

APRs and Earn-A-Second Buck have never achieved the 2/3 threshold for adoption of any position at our convention. Lacking this vote, we remain neutral.

On the continuation of mandatory harvest reporting, we remain neutral on its implementation but recognize that many of the regulatory proposals up for discussion today require harvest reporting to remain mandatory and believe the changes that have already been implemented for mandatory reporting are positive.

Yours in conservation,



Justin Tomei, Policy & Government Affairs Manager