

# Minnesota DNR Response to Public Comments: Draft Minnesota White-tailed Deer Management Plan

## Background

The draft Minnesota White-tailed Deer Management Plan was released for public comment on April 9, 2018. The comment period was open from April 9, 2018 to May 9, 2018. Online and hard copy questionnaires were used to collect public comment on the plan's goals, objectives, communications strategies, and deer management approaches. The comment period was publicized through a series of statewide, in-person open houses (n=37), as well as through a number of media channels. Respondents were self-selected, meaning the survey results cannot be considered representative of the state's deer management interests or of the general population. All survey responses were read by DNR staff and grouped by theme.

In this document, DNR developed responses to the major themes identified in public comments. Some comments also led to edits reflected in the final deer plan. This document does not respond to every public comment; however, many ideas were shared by the public that staff will consider as part of their ongoing deer management activities.

## Respondent Information

MN DNR received 1,042 online and 67 written responses to the deer plan questionnaire. Half of the respondents were 55 or over, and 91% were male. Residents from 81 counties responded, and half of the respondents resided in the following counties: St. Louis, Hennepin, Itasca, Dakota, Stearns, Anoka, Ramsey, Morrison, Olmsted, Scott, Wright, Aitkin, Carlton and Otter Tail. Hunters were the largest demographic: over 90% of respondents had hunted, almost 80% had hunted for over 20 years, and hunting was the predominant interest in deer selected by respondents (88%). However, other major interests were represented as well:

- General Wildlife Interest (68%)
- Wildlife Health (47%)
- I am a Recreational Landowner (41%)
- Ecological Impacts of Deer (28%)
- Other Deer-related Recreation (22%)
- I am an Agricultural Landowner (22%)
- Socio-economic Impacts of Deer (17%)
- Other (9%)

DNR also received several letters, primarily from organized groups (e.g., a local sporting group, Minnesota Deer Hunters Association, Quality Deer Management Association, The Nature Conservancy) and tribal agencies or communities (i.e., Leech Lake Band of Ojibwe, 1854 Treaty Authority, Shakopee Mdewakanton Sioux Community, Great Lakes Indian Fish & Wildlife Commission, Fond du Lac Division of Resource Management and the Grand Portage Band of Chippewa). Comments from tribal agencies or communities are summarized in the partner document, *“Minnesota DNR Response to Tribal Comments: Draft Minnesota White-tailed Deer Management Plan.”*

## Summary of Responses

DNR received public comments on a variety of topics. Feedback ranged from broad to very detailed, and from positive to negative. Overall, respondents to the online questionnaire were satisfied with the plan:

- Over two-thirds were “neutral,” “satisfied” or “very satisfied” with the deer plan’s purpose, mission, vision, guiding principles and values.
- Over half said the plan helps them “understand how you can influence deer management decisions.”
- On average, roughly half were “satisfied” or “very satisfied” with each of the plan’s goals. Less than 30% of respondents indicated dissatisfaction with most goals. Only the Population Management, Monitoring, and Research goal received a greater percentage of dissatisfaction (37%). Respondents ranked their satisfaction in the following order:
  - **Goal D: HEALTHY DEER:** Support deer herd health by monitoring and addressing disease. (58% satisfied/very satisfied)
  - **Goal A: COMMUNICATION, INFORMATION SHARING, AND PUBLIC INVOLVEMENT:** Foster trusting, respectful, and effective two-way communication between DNR and the public regarding deer management. (54% satisfied/very satisfied)
  - **Goal E: HEALTHY HABITAT:** Maintain natural wildlife habitat by protecting, enhancing, and restoring habitat and by managing for an appropriate number of deer. (52% satisfied/very satisfied)
  - **Goal G: DEER MANAGEMENT FUNDING:** Seek sufficient funding and promote cost-effective deer management. (44% satisfied/very satisfied)
  - **Goal H: DNR DEER MANAGEMENT:** Practice and ensure continuous improvement within DNR’s deer management program and supporting activities. (44% satisfied/very satisfied)
  - **Goal C: POPULATION MANAGEMENT, MONITORING, AND RESEARCH:** Manage deer adaptively, considering both biological and social information in decision-making. (40% satisfied/very satisfied)

- **Goal F: IMPACT OF DEER ON OTHER RESOURCES:** Reduce negative impacts of deer to the land; resources; and other species, including people. (39% satisfied/very satisfied)
- **Goal B: DEER STAKEHOLDER SATISFACTION:** Consider social dimensions of deer management decisions. (39% satisfied/very satisfied)

Responses to the deer plan questionnaire suggest that the goals represent public priorities for deer management, with greater stakeholder focus on and interest in specific strategies for implementation.

## Response to Open-ended Comments Resulting in Notable Plan Edits

### Length, clarity, overall content

#### *Public comments:*

Some commenters praised the plan as balanced, comprehensive and strategic. Others critiqued the plan as too long, complicated, or vague. There were concerns from some commenters about the challenges of balancing or prioritizing the goals listed in the plan, with some commenters specifically requesting numeric prioritization or weighting of goals and objectives. Overall, most appeared to believe the plan is a “good start” but there is a desire for greater specificity with many commenters feeling that “time will tell”.

#### *DNR response:*

The plan provides strategic goals (listed on pg. 2 above) and objectives to help direct deer management activities throughout the state over the next 10 years. Due to the range of stakeholder expectations regarding plan content and format, the overall structure will remain relatively unchanged. To provide additional clarity, the DNR reviewed the plan with a goal to remove excess language and jargon while balancing stakeholder desires for information. DNR considers all of the goals as equally important to address over the course of the 10-year timeline; however, priority actions will shift on an annual basis (e.g., to meet time-sensitive needs, address emerging issues, adjust management based on performance measure trends).

### Disease management

#### *Public comments:*

Chronic wasting disease (CWD) was a major concern among many respondents, who felt it should be the top deer management priority, either for its impacts on the health of the wild deer population and associated hunting opportunity or for its human health implications. These comments included suggestions for different management approaches including banning captive cervid farms; increasing/requiring farm inspections; banning/allowing deer baiting, recreational feeding, or emergency feeding; eliminating Antler Point Restrictions (APR); and removing more deer from the landscape. Commenters requested more information about DNR’s CWD strategy in the plan. A specific request was made to use the more directive language used in Appendix A and DMPAC’s recommendation (Appendix C) within the plan (e.g., “Pursue legislation...”). A few commenters specifically requested that DNR strengthen taxidermy regulations and raised concerns about the DNR disposition confiscated deer or deer acquired for disease sampling purposes.

### *DNR response:*

Due to the growing risk of CWD introduction and spread on the landscape, CWD response and management will be a top priority for at least the first few plan years. Plan revisions were made to better highlight CWD management as a top priority. With respect to interest in more detail about CWD management, the plan references the CWD management website<sup>1</sup>, where members of the public can review the CWD response plan and learn more about the disease, DNR management activities, and opportunities for public to participate in the CWD response. Minnesotans can expect to see additional information and outreach related to CWD as DNR begins to implement the deer plan. Many specific recommendations were likely raised by respondents due to the Office of the Legislative Auditor's recent report on the Board of Animal Health's Oversight of Deer and Elk Farms (released April 2018) and resulting media attention/public discussion; DNR will continue to work with the Board of Animal Health to address and minimize disease risk. Specific management strategies and disease management approaches will continue to be discussed by DNR and with our stakeholders.

## **Moose management**

### *Public comments:*

DNR received a number of comments on moose and moose management, with some references to DNR's Moose Research and Management Plan. Some respondents appeared to be unfamiliar with the moose plan, suggesting one should be developed. Some respondents were unclear on the relationship between density thresholds established in the 2011 moose plan and publicly established population goals set in 2015. Feedback included comments that DNR should manage for deer over moose, DNR should increase deer numbers in northeastern Minnesota, and stated that wolves have more of an impact on moose than deer. Others requested management in the primary moose range to decrease or exclude deer, noting that action is important to support and maintain moose as well as forest regeneration in moose range.

### *DNR response:*

Due to concern about big game priorities in moose range that were raised during the deer plan comment period, the plan has been revised to clarify that moose will be the big game priority in primary moose range for the foreseeable future. This management decision is based upon moose population declines and Special Concern status. Hunter and landowner survey results in 2015<sup>2</sup> indicated that non-hunting (i.e. those who do not hunt deer) landowners in the area would prioritize moose management over deer to benefit moose; hunters tended to be more diverse in their preferences, with most not wanting to prioritize one species over the other even if it would help the moose population.

The 2011 Minnesota Moose Management and Research Plan<sup>3</sup> calls for keeping deer numbers below 10 deer per square mile (dpsm). Direction from the moose plan was considered during the 2015 deer goal setting public process that resulted in population goals substantially lower than 10 dpsm. In addition to concerns about moose, the 2015 citizen advisory team considered multiple resource values in developing their final

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<sup>1</sup> <https://www.dnr.state.mn.us/cwd/index.html>

<sup>2</sup> [https://files.dnr.state.mn.us/wildlife/research/hd/deer/2015-gb1\\_hlsurvey.pdf](https://files.dnr.state.mn.us/wildlife/research/hd/deer/2015-gb1_hlsurvey.pdf); page 24

<sup>3</sup> MMRP - [https://files.dnr.state.mn.us/wildlife/moose/moose\\_plan.pdf](https://files.dnr.state.mn.us/wildlife/moose/moose_plan.pdf)

recommendations for deer populations within moose range (e.g. forest regeneration). Results from current research suggest that parasite transmission has continued to negatively impact moose populations in areas where deer densities have been well below 10 dpsm. As noted in the plan, from a moose management perspective, the most feasible and potentially effective strategy to reduce this negative impact is to maintain deer densities on moose range as low as practical. DNR will continue to work with stakeholders to establish deer population goals that are consistent with moose management but also maintain a presence of deer in northeastern Minnesota.

## **Population (age/sex) structure or quality management**

### *Public comments:*

Many comments focused on management of deer age and sex ratios, and on buck or quality deer management specifically. Comments and suggestions included concern that Minnesota is not competitive for large deer compared to other states; young bucks should be protected; the state should have more balanced age/sex ratios; age/sex metrics should be reported; the number of trophy bucks should be increased; building a quality herd should be a priority (rather than quantity); management should be in balance with habitat; and that antler point restrictions (APR) should be expanded. Other commenters suggested removing APR, mostly to increase deer available for hunting but also tied to CWD concerns. Some people referred to content in the Office of the Legislative Auditor's program evaluation report related to this topic.

### *DNR response:*

DNR has been surveying hunters about preferences related to deer management for almost two decades<sup>4</sup>. Over that time, a majority of hunters has consistently reported a preference for an increase in the proportion of antlered bucks; however, there has also been a fairly consistent lack of support for regulations that DNR could implement to achieve that objective. Based on a comparison of 2005-2007 versus 2015-2017 surveys, statewide hunter support for these regulations (e.g., APR, party hunting prohibitions, delayed season opening) has also decreased over time. Although not necessarily representative of all Minnesota deer hunters, public comments on this plan suggest a similar desire for more, older bucks but a lack of agreement on the means to accomplish this goal. Minnesota DNR will continue to monitor hunter preferences and work with hunters to identify preferred and supported management strategies. The risk of CWD also has implications for future discussions or decisions related to age ratios or sex ratios within the deer population, given higher infection rates among male deer and concern regarding potential transmission via dispersal and social interactions. Plan content was revised to clarify DNR's commitment to tracking hunter preferences, identifying preferred management strategies, working within legislative direction, and including other important deer values (e.g., deer health) in management decisions (e.g., pages 12-15).

## **Population: status and monitoring**

### *Public comments:*

In addition to suggesting management at the DPA or regional level, commenters sought clarity on how

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<sup>4</sup> <https://www.dnr.state.mn.us/wildlife/research/surveys/deer/index.html>

population estimates are developed per area. Some respondents noted differences (either higher or lower) between their observations and DNR's models or estimates – primarily with respect to season regulations that did not seem to align well with population levels and associated goals. There were also comments on the deer population status suggesting it was too high or too low in areas throughout the state. Some commenters suggested having people who spend substantial time outdoors, including landowners and hunters, help collect and report information on the deer population. Various additional monitoring approaches were suggested. Commenters also requested having deer population goals and management strategies explained and reported by DPA or region.

*DNR response:*

Minnesota DNR manages deer populations based on population goals established for each deer permit area (minus DPA 601 and 182) in the state and will continue to use a public goal setting process to revisit established goals. Although detailed DPA-level information is too specific to include in a statewide deer plan, additional references have been included on page 28 to direct readers to more local information. Of note, DPA detail reports are a good initial place to look for more local information, including population trends and goals, recent harvest data and habitat information; discussion with local area wildlife managers is also encouraged.

The plan was also revised to clarify that annual harvest regulations for each deer permit area will be set to meet publically established population goals; DNR will not be setting annual harvest regulations to meet a specific, consistent level of harvest (page 10).

As described in the plan (pages 24-25), DNR uses multiple indices to track population changes. Population modeling does provide density estimates, but the primary use of modeling is to look at population trends over time and compare them to other data that are indicative of population change. Often, individual observations of deer populations appear to be inconsistent with trends suggested by indices; this may also result in questions about the management strategy implemented by DNR. Sometimes the differences can be attributed to the scale of observation (e.g., average deer numbers will differ between that of the entire DPA and a more local observed area) and sometimes other factors may be involved (e.g., decisions about how quickly to meet population goals). DNR recognizes this is an area of high interest for many citizens and will work to improve our two-way communication by providing more formal opportunities for members of the public to share season and population observations as well as learn about the information used to establish deer seasons and manage populations. Similarly, DNR staff are continuously seeking opportunities to improve our population monitoring. Good examples of recent changes include the development and testing of a bowhunter observation survey as well as current research projects to improve information used in population models or methods to track population changes.

## **Harvest target**

*Public Comments:*

Some commenters stated that the harvest target (200,000 deer harvested on average per year) is too low and proposed 225,000 as an alternative. Some instead commented that 200,000 is too high. Additional discussion within the plan regarding how DNR arrived at the proposed level of 200,000 deer was also requested. Some felt that the harvest target was the only tangible or new metric being used by DNR and supported the new approach. Some commenters who support the harvest target as-is nonetheless were unclear on its purpose or

how a harvest target will be used when harvest is expected to fluctuate annually due to management toward population goals or uncontrollable factors such as winter severity or hunting season conditions. A suggestion was made to report a 5-year rolling average rather than one static number.

Those critical of the target cited perspectives that it is not rooted in scientific data or that using a statewide goal is not a good way of managing deer populations in an ecologically diverse state. Many noted a preference for more local management or goals. Some proposed instead that harvest goals be set per deer permit area (DPA), at the regional level, or based on local carrying capacity. Others expressed a desire for, or interest in, more clarity around ease of access to information on DPA, regional, or local management. Finally, there was also a suggestion to place the harvest objective under stakeholder satisfaction rather than population management.

*DNR response:*

Due to stakeholder interest, DNR agreed to develop a harvest target for the deer plan. The plan was revised to clarify that annual seasons (hunting regulations) will continue to be set to move deer populations toward established population goals (i.e., increase, maintain, decrease the population) for each DPA. DNR does expect that harvest will fluctuate over time as regulations are set to meet population goals. The harvest target, identified as a performance measure in the plan, will *not* be used to inform annual season decisions. Rather, the harvest target will be used over the course of the plan to track how well DNR is meeting population goals at a statewide level and demonstrate progress in providing consistent hunting opportunities over time (while recognizing factors beyond DNR control such as severe winters). Performance related to population management at the DPA-level will also be monitored over the course of the plan.

The harvest target of 200,000 deer per year was informed based on a combination of (1) staff analyses designed to identify a statewide harvest level anticipated to be achieved when population goals are met<sup>5</sup> and (2) the diversity of recommendations expressed by the Deer Management Plan Advisory Committee.

Because this is the first time a harvest target has been identified, DNR will review the specific target level at the mid-point of the plan to assess how well the 200,000 target aligns with success in meeting DPA-level population goals.

## **Response to Open-ended Comments (Relevant to Plan but No Substantive Plan Edits)**

### **Action items and metrics**

*Public comments:*

Some commenters requested clarity regarding why the plan does not address specific implementation activities and questioned how goals will get accomplished without specific action items. A few commenters desired specific metrics associated with goals; many felt the listed performance measures were not objective, concrete, or specific enough (e.g., how do you quantify “Deer habitat enhancement”). Some also commented that goals

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<sup>5</sup> [https://files.dnr.state.mn.us/wildlife/deer/plan/20171213\\_Harvestobj.pdf](https://files.dnr.state.mn.us/wildlife/deer/plan/20171213_Harvestobj.pdf)

and objectives should be listed in order of priority to clarify influence in decision making; another comment suggested new performance measures should be distinguished from existing performance measures. Comments also suggested a need for further clarification on the differences between plan performance measures and data collected to support general deer management and monitoring. Some commenters requested additional performance measures or data collection related to deer age and sex ratios, many of which referenced the OLA report language related to SAK model data.

*DNR response:*

The plan was purposely designed to provide high-level, strategic direction for deer management in Minnesota. Some near-term strategies and priority actions are identified in appendix A; additional actions will be identified and implemented over time as DNR works to address all deer plan goals. Performance measures will be used to monitor success in meeting and balancing all deer goals. It is important to note that DNR collects a substantial amount of other data and that information is used to help make management decisions. As noted above, DNR considers all of the goals as equally important to address over the course of the 10-year timeline; however, priority actions will shift on an annual basis (e.g., to meet time-sensitive needs, address emerging issues, adjust management based on performance measure trends).

Minnesota DNR does not use a SAK model to monitor deer populations; however DNR is actively addressing OLA recommendations to improve population monitoring (e.g., Strategy 2 under Goal C; Appendix A) and is considering the value of collecting additional age structure data (e.g., through the mandatory harvest registration system or some other means). Decisions to collect additional data will be based upon the value that those data will provide to inform management actions.

## **Public input and involvement**

*Public comments:*

Some comments called for more hunter input; some for more landowner, trapper or farmer input; and some for more input from general public or the non-hunting public. There were comments discouraging inclusion of special interest groups in deer management. There were suggestions about DNR's public engagement efforts related to the deer plan and overall, including calls for more hunter satisfaction surveys, more social media, and more local meetings. Commenters supported increasing interactions between DNR and stakeholders, and emphasized transparency. Some shared the perception that DNR does not listen and lacks public trust. Greater specificity on the role of public input in annual season setting as well as DNR "policy" or regulations was also requested.

*DNR response:*

Minnesota DNR manages wildlife as a public trust resource, which requires considering the interests of all stakeholders (including future generations). DNR is committed to working with all Minnesotans to support sustainable deer and natural resource management into the future. The deer plan demonstrates an increased emphasis on two-way communication with stakeholders and the use of social science methods to better understand current and changing public attitudes and satisfaction about deer management.

DNR recognizes the interest of some stakeholders to more actively inform annual hunting strategies. On an annual basis, DNR staff will continue to identify season regulations to achieve publicly established population



goals. The greatest opportunity for members of the public to inform deer population management will continue to be through active public participation in goal setting processes and responses to attitude surveys. More formal opportunities for members of the public to annually share observations on deer population status and season management desires will occur each winter/early spring (e.g., local area meetings) in order to inform staff discussions about upcoming season management. Opportunities to meet with local area staff and discuss/learn about season management rationale, as well as suggest potential regulatory changes/research needs, will also be provided prior to the hunting season.

## **Public Access:**

### *Public comments:*

Some comments suggested increasing access to hunting land, for example through acquiring more public lands, opening up landlocked public land or making changes to federal policy (e.g., to allow hunting on CRP land). A small number of comments encouraged making wildlife areas off limits to hunting.

### *DNR response:*

Minnesotans benefit from access to a substantial amount of public land, including lands administered by the federal government, the state, and county or local governmental units. Minnesota DNR administers more public land than most other states and has a strategic approach for future land protection<sup>6</sup>. DNR agrees that access to land is critical for the maintenance of hunting traditions (tribal and nontribal) and for deer population management. As noted in the plan, the Wildlife Management Area/Aquatic Management Area Acquisition and Strategic Plan will be finalized soon and will provide direction on priorities for land protection across the state. Performance measures in the deer plan identify plans to increase WMA acreage as well as Walk-in-Access to private lands. Strategies to identify priority deer habitat for protection and management are listed in appendix A, with an emphasis on winter habitat across the state.

## **Education and Outreach**

### *Public comments:*

Some commenters emphasized the importance of recruiting hunters, especially youth, through training and education. Others proposed that more information on the benefits of deer hunting or negative impacts of deer on people should be shared with the public.

### **DNR response:**

Hunter recruitment, retention, and reactivation is a high priority for DNR. More information on the DNR R3 program and training/mentoring opportunities is available on our website<sup>7</sup>. Improved communication is a deer plan goal. Although providing additional information about the range of values that are impacted by deer management decisions is a long-term strategy in the deer plan, our near-term focus on deer management communication and information will be focused on responding to chronic wasting disease, addressing public

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<sup>6</sup> [https://www.dnr.state.mn.us/lands\\_minerals/acquisitions.html](https://www.dnr.state.mn.us/lands_minerals/acquisitions.html)

<sup>7</sup> <https://www.dnr.state.mn.us/harr/index.html>

concerns about the use of public funds for deer management, and communicating the rationale for deer management decisions.

## **Habitat and relationship to herd health**

### *Public comments:*

Some commenters emphasized the importance of habitat and its relationship to deer herd health, suggesting a greater emphasis on habitat condition (quality) and habitat management activities (e.g., maintenance of forest winter habitat or food plot management in farmland). A number of comments suggested management to benefit habitat should be a higher priority than hunter success. Others suggested a more holistic approach to wildlife/ecological management, for example through a greater focus on multi-species management. A recommendation was made to more clearly state the need to manage deer populations at levels the habitat can support. A suggestion was made to add an objective that acknowledges the need for special hunts to reduce deer populations in areas where the health of the habitat is being compromised. Another comment suggested a stronger commitment to design and implement a habitat monitoring protocol. A suggestion was also made to acknowledge climate change as an important trend related to habitat impacts.

### *DNR response:*

Habitat management is a DNR priority and impacts of deer population management are an important consideration discussed during deer population goal setting processes. DNR commits substantial resources to habitat protection and management. Impacts that deer have on native plant communities are well documented and DNR recommends management of deer populations below levels where these impacts would be significant. DNR deer management will aim to balance all goals within the plan, including the intent to minimize negative impacts on other resources and promote healthy habitat. We agree, and have noted, that a performance measure related to habitat condition is missing; DNR will work to identify statewide data that can be monitored and reported as a measure of success in minimizing deer impacts on native plant communities and habitat. Although DNR considers climate change in all planning efforts, the topic is not specifically addressed in the deer plan because we do not anticipate climate change will substantially affect statewide deer management activities during the timeframe of this plan. In recent years, over 100 special deer hunts have been implemented annually in Minnesota, many of which are designed to address locally over-abundant deer populations; the percentage of special hunt requests satisfied is a performance measure within the plan. Near-term strategies associated with winter habitat needs and management of School Trust Lands are identified in appendix A. More direction on School Trust Land management is anticipated in the future.

## **Impacts to Other Values**

### *Public comments:*

Many comments focused on a desire to include more management activities that address human conflicts with the deer population in the plan. Some expressed concern that the deer plan was very focused on deer hunting and less about other deer and human interactions. This included concerns that deer cause damage to crops and livestock; gardens or landscaping; result in financial losses; are an urban nuisance; cause vehicle collisions; and damage the environment (e.g. native plant communities and forest regeneration). Commenters also mentioned Lyme disease as a public health concern. A desire to parse the range of negative impacts into more specific

categories (e.g., human impacts, ecological impacts) was expressed. It was also suggested that the DNR take a position on the use of non-toxic ammunition.

*DNR response:*

As noted above, DNR considers all of the goals – including impacts of deer on other resources – as equally important to address over the course of the 10-year timeline. Many of the concerns raised in public comments are acknowledged in the deer plan and will continue to be considered in making deer management decisions. While specific categories of negative impacts are not distinguished as separate goals in the deer plan, these issues will continue to be individually considered in deer management decisions. DNR encourages all hunters to consider using non-toxic alternatives for all of their hunting<sup>8</sup>, has conducted research related to the use of lead ammunition<sup>9</sup>, has actively proposed restrictions on ammunition<sup>10</sup>, and has included requirements for non-toxic ammunition use in shooting permits (permits designed to address crop depredation) due to associated donation requirements for venison.

## **License fees & funding**

*Public comments:*

Commenters requested additional clarification on funding sources and priorities. For example, they asked how license dollars are used, what percent of license fees are spent on deer management, and how the remaining funds are used. There was some confusion about how \$16 per license was determined, as well as concerns that the plan is an excuse to get more funds (specifically for administrative activities). A limited number of commenters weighed in that license fees are too high and may discourage new/young hunters as well as existing hunters, while some encouraged increasing fees to deal with priority issues like CWD.

*DNR response:*

DNR recognizes public interest in better tracking and documentation of deer license revenue spending and will be implementing accounting practices to better communicate how license dollars are used to benefit deer and deer hunters, including deer habitat, management, and research activities. The \$16 dollar value was based on discussions that occurred between DNR, hunting groups, and legislators during the 2017 legislative session. As noted in the plan, management activities that benefit deer are funded at levels that exceed deer license dollar revenues. More information about game and fish funding and expenses can be found on the *Game and Fish Fund* and *License Dollars at Work* pages of the DNR website<sup>11</sup>. Minnesota adult deer license dollars are at the mid- to low end of the range among Midwestern states, youth licenses are \$5.00 or less, and license dollars leverage substantial federal funding for additional wildlife management. Minnesota DNR is working to address

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<sup>8</sup> <https://www.dnr.state.mn.us/hunting/ammo/index.html>

<sup>9</sup> <https://www.dnr.state.mn.us/mcvmagazine/issues/2013/sep-oct/copper.html>;  
<https://files.dnr.state.mn.us/aboutdnr/reports/legislative/2018-lead-shot.pdf>

<sup>10</sup> <https://www.dnr.state.mn.us/hunting/ammo/nts.html>

<sup>11</sup> <https://www.dnr.state.mn.us/gamefishoversight/index.html>;  
<https://www.dnr.state.mn.us/licensedollarsatwork/index.html>

other, more substantial barriers to youth recruitment through our R3 program and wildlife management activities that maintain/enhance populations and provide hunting opportunities.

## Regulations

### *Public comments:*

Comments addressed a wide range of regulatory issues such as changing hunting season dates; implementing strategies to increase the proportion of mature bucks; increasing non-resident license fees; addressing poaching concerns; banning lead shot; and implementing various harvest options (e.g. antlerless permit allocation, cross-tagging, earn a buck, one deer per year per season). Many of these comments were DPA- or region-specific. A substantial number of regulation-related comments addressed antler point restrictions, with support for the regulation and expansion as well as opposition to the regulation. Some commenters representing tribal interests provided suggestions for methods to increase deer harvest in moose range, ban or limit deer feeding, and conduct additional bear management to benefit moose.

### *DNR response:*

Comments on specific management tools are beyond the scope of deer plan revisions but provide background information for future discussions (e.g., at local area meetings and with the statewide deer input committee) and attitude survey development.

## Wolf management

### *Public comments:*

Some commenters suggested the plan address wolf management and predator control, especially in northern Minnesota and in the primary moose range.

### *DNR response:*

Wolves are currently under the protection of the federal Endangered Species Act, and therefore DNR cannot manage the state's wolf population, except for providing funds to remove wolves that are verified to be preying upon livestock or pets. There are efforts in Congress to de-list the wolf and give management authority back to the state. Similarly, the U.S. Fish and Wildlife Service is planning to propose delisting of the wolf by the end of the calendar year. The DNR has demonstrated that the state can have a regulated wolf hunting season without diminishing the population, and it is likely a hunting season will be reinstated after delisting. Whether or not the state should use a wolf hunting season to actually reduce the wolf population for the sake of increasing deer or moose numbers is a question that would require additional public input and discussion. More information about wolves and wolf management, including the wolf management plan, is available on the DNR website<sup>12</sup>.

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<sup>12</sup> <https://www.dnr.state.mn.us/mammals/wolves/mgmt.html>