

Public Correspondence*

Adoption of Oregon Administrative Rules for the
Oregon Black-tail Deer Management Plan

From: ODFW Comments
Sent: Tuesday, September 23, 2008 4:35 PM
To: Peter Test; Liz Bueffel
Subject: FW: Blacktail Management Plan

From: Lewis Friend [mailto:LewisFriend@zcsengineering.com]
Sent: Tuesday, September 23, 2008 1:01 PM
To: ODFW Comments
Subject: Blacktail Management Plan

To Whom It May Concern:

I have reviewed the draft blacktail management plan and have a few comments. I generally hunt in the southwest part of the state mainly in the Dixon and Rogue units. I have historically hunted the High Cascade and general seasons and have had better than average success (46%). I have experienced the reduction in hunting days after the closing of Cascade Elk, and while I wish the late Oct/early Nov portion of the season was longer, I do understand that a large portion of the bucks taken are during those last few days when the conditions are typically at their best (moisture/pre-rut).

If hunter harvest is impacting the population during this time frame why not only have the general rifle tag open until Cascade Elk and then have a two week controlled hunt during late Oct/early Nov. This controlled hunt could either be centerfire or muzzleloader. This tag could be similar to the High Cascade, where it is valid for both seasons, or a separate tag altogether. This season would also benefit the LOP program, as these landowners would have an increased opportunity to manage the deer populations on their property, when densities are typically at their highest. By making this new controlled hunt the Department would also see an increase in controlled hunt applications. Another key point is that this would in turn become a highly sought 'trophy' type hunt that over a period of time would actually help the age class structure of the deer population.

I wish the department good luck in adopting this plan and attempting to increase the population of blacktail deer in Oregon.

Lewis Friend
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Michelle Tate

Subject: FW: Comments on the draft Black-tailed deer management plan

From: Charlie and Cindy Bruce [mailto:ccbruce@peak.org]
Sent: Monday, July 21, 2008 5:50 PM
To: ODFW Comments
Subject: Comments on the draft Black-tailed deer management plan

Dear Friends,

Here are a few overall comments on the draft BTM management plan. While on the right track, the plan needs to be more specific in the objectives, an implementation schedule is needed that included priorities, personnel and budget needs should be identified, and agency annual work plans will have to incorporate strategies at the field level. Annual reports should be developed and made available to the public and Commission to show how progress is being made. Nothing is said about how long this plan is for, adaptive management to changing conditions and lessons learned. Last nothing is said about the relationship of this plan and how it will be integrated with other species plans and the State Conservation Strategy. Single species management will not succeed given today's knowledge of ecosystems and inter-relationships among plants and animals.

FYI I have hunted black-tailed deer and eastern Oregon mule deer since 1968 so I am familiar with the species and habitat needed.

Comments by Page

1. Executive summary. The last paragraph should be deleted as it is both redundant (it's said earlier that BTM are difficult to survey) and does not provide anything about management direction.
2. Page iv. There are a number of other abbreviations or acronyms in the text of the plan that are not included in this table such as Wildlife Management Unit (WMU). Is there a standard for what's on the list or not?
3. Page 1. This is my biggest concern. The list of "objectives" are not properly objectives until they are quantified and time limited (i.e., they are just general goal statements). Unless you can measure whether you are meeting your objectives over time, you will never reach them. I can't tell what any of the objectives really mean or when they will be accomplished (the first one is a real mouthful to begin with). One can't develop strategies unless you know what the specific objective is.

Here is the type of language that comes to mind for some of the objectives:

Obj. 2. Develop written agreements with land managers over the next five years that identify BTM habitat management strategies for key habitats in each wildlife management unit (i.e., foraging habitat, wintering habitat, migration routes).

Obj 5. Address property damage through proactive education (publications, Extension Service, landowner associations) and daily response to damage complaints.

Obj. 6. Identify key data and research needs 2010.

4. Page 2. Nothing is said about the status of BTM in the remainder of its range nor what is being done by those states to address population concerns.

7/28/2008

5. Page 5 - Population estimates. Since techniques to sample BTB populations accurately do not exist, what are the confidence limits on the estimates listed? Based on reading the remainder of the document, there are no confidence limits so that should be clearly stated or the numbers are even more meaningless.
7. Page 7. Has AHD just appeared in Oregon given it was first confirmed in 2002 or is that a property of not looking and testing? What's going on in other states and how are they dealing with it?
8. Page 8 - Predation - this section doesn't really tell the reader if the Department feels that predators are a significant concern or that we need to find out because there is cause for concerns. Predator eat deer because they are supposed to. So, now what?
9. Page 10 - the statement is made that habitat and disease are believed to be the most significant factors contributing to the decline of deer populations, but that hunting is not. Given that, there should be key objectives to address those factors, but there are not or you can't tell.
10. Page 10-11. Neither Figure 5 or 6 are referenced in the text and value of Figure 5 is unknown.
12. Page 12, last para. The statement that there is no documented evidence that Roosevelt elk impact forage for BTB yet there are no references provided to show that the issue has ever been properly studied. Make it clear to the readers what you don't know about various facts.
15. Page 15. Deer harvest information - explain where these harvest data come from and what the confidence are on them. There should be no comparison between the quality of data collected in the 1960s vs. the 1990s (one would hope).
16. Page 16. Under 2005 reference is made to hunt series but there is not explanation as to what those are for the uninformed.
17. Page 21. Why is habitat condition or change part of management decisions if it one of the primary reasons for decline of the populations? Secondly, if hunting has not been determined to impact BTB populations in general, why are hunting seasons being reduced?
18. Page 21-24. Population monitoring. The relative costs of the various methods should be provided to understand what it takes to use the various methods.
19. Page 25. The SAK model. Why was this model selected over others and is it realistic given the need to understand mortality factors geographically, something that normally would require a long-term research project? Until a meaningful inventory method is developed, information collected using existing methods is not reliable. First things first.
20. Page 47. Literature Cited. This needs editing as at least one date is wrong (Connolly 1778) and there are redundant citations on page 51 for Pamplin. Back in the text a number of documents were not cited so that needs to be checked again (e.g., Northwest Forest Plan).

Good Luck! Charlie Bruce

DATE: July 18, 2008
TO: Michelle Dennehy
FROM: Richard Nash
RE: Black Tail Management

I would like to give you a brief history of my family history so you can see what I know from experience of being in this area for 55 years.

My great grandparents came to South Tillamook County in the late 1880's. My grandfather started a dairy farm in 1905. I was raised on that dairy farm until 1970 and in 1974 I started logging in Tillamook County. Besides spending Saturday and Sunday in the woods looking for animals, I have been logging for 35 years, so I am in the woods each and every day!

My daughter and son have hunted with me since each were 12 years old; which means my daughter has hunted for 15 years and my son has hunted for 12 years all within Tillamook County. I taught my kids to be horn hunters because we use to see 10-15 bucks a season. There has been a steady decline over the years because of over hunting. Now we are lucky to see 2-3 bucks a year and the quality of deer is just not there.

I usually start pre-scouting around Memorial weekend. This past year I spent two weekends, and six hours, in South Tillamook County spotting, covering about 30 miles of clear cuts and old reprod units. I saw 10 deer, 66 adult elk, and 10 calves. This past year I spent three weekends, and eight hours, on the Wilson River unit, covering about 51 miles. I saw 7 deer, 30 elk, and 3 bears. At this time of year, the deer and elk are with their babies and the bucks and bulls are growing horns and in their summer coats and they should be using the clear cuts all of the time. The deer population is so low, it will be hard to ever rebound.

Herman Beiderback is a biologist for ODFW here in Tillamook County. I have spent 12 years riding with him to do black tail counts after the hunting season. The numbers have slowly decreased each year. I don't know if he is a puppet for the Oregon Department of Fish and Wildlife, or if a lot of his opinions are his alone. His comments to me are "it will never be like it use to be". To me, that is the wrong attitude. Let's have the attitude of "let's make it like it use to be". I have an antler list tag harvest from the ODFW for 1998-2007 and it says there were almost 2700 does killed in the Trask and Wilson units. I don't know how they checked all of these tags, as I can't imagine they had a phone survey on all of them. Some years there were 2600 tags! What is bad is the people that have these doe tags usually hunt in pairs and they come in and kill the mother and yearling out of the same unit. If an adult doe would have survived for five years, she and her offspring would have been produced a total of five deer (estimating). At that rate, that means in the last ten years we have lost 13,000 deer! That doesn't count predator, hair loss, or winter kill. I would like to know what your ideas are on replacing these deer.

Since about 1980 the government has basically stopped logging around here and the habitat the logging use to create is totally gone. About 1993 the Oregon Department of Forestry started thinning the Tillamook Burn. I have been working on the thinning of this burn since the beginning. The last five or six years, the logging industry has switched to modify clear cuts, which leaves big buffer strips in the creeks. This opened up a lot of new habitat because the forest had chocked out a lot of the old due to the timber being too thick. Now the ODF is spraying all of the modified clear cuts. Some of the units are nuked so badly from the spray it is killing the leave trees that we left. Now the animals have less habitat than they had before. In the season of 2005, in the Wilson unit, we saw 15-25 deer every day that we hunted and 2-3 herds of elk within our ten day hunting period. And we saw approximately 15 bucks for the season. In the season of 2006, in the Wilson unit, they tore out Jones Creek Bridge, so we had to drive around taking another 45 minutes to get to the same unit, hunted five weekends and saw a total of 15-20 deer, 4 elk and 2 bucks. We didn't realize that they had sprayed that area until the season was over. These are the same Wilson units I am looking into this year and seeing low numbers of deer.

These units that are being logged now are anywhere from 800 to 1000 acres. Oregon Department of Forestry is suppose to be creating habitat, but they shouldn't be spraying the entire 1000 acres. I want the trees as bad as anybody else, but I also want habitat for the animals. One third of the area should not be sprayed.

I have been a Rocky Mountain Elk Committee Member for 18 years and an Oregon Hunters Association Committee Member for 15 years. We have been installing hunter gates off and on for the last 10 years; mainly to have walk in areas and to keep doe hunters out. This is before spraying started. If the spraying is going to continue, it doesn't do any good to put the gates in.

Because of the mismanagement between Oregon Department of Fish and Game and the Oregon Department of Forestry, habitat and wildlife are not there and you wonder why you are losing hunters. Recruiting new hunters is pretty hard when one only sees one or two deer in a days hunt. In 2006 it took us four days to find a buck for a new hunter, a college friend of my son's, and it ended up being a little fork. In 2007 we all drew Eastern Oregon deer tags for the Keenig unit and we killed 9 deer out of a hunting party of 11. We saw a lot of deer and a lot of bucks. The 2008 season looks pretty grim by what I have seen so far. My son-in-laws grandfather is coming from Kodiak, Alaska to kill a decent black tail to complete his grand slam of deer. It doesn't appear he is going to be able to find anything decent! We have great country and could have a lot of deer if it hadn't been mismanaged.

Now that my children have grown and moved on it is hard to get them to come back to hunt like we use to as there just isn't anything to hunt! I had more fun finding the kids bucks than actually killing one myself. We always passed up the little bucks hoping they would survive another year.

I am asking that we stop all doe hunting in the Wilson and Trask units for at least a five year period to make your study. If the tracks are not on the banks from every day use, as Herman Beiderback says they are, it means the animals are not there. What is happening now is not working and it is time for a change. I am an avid hunter and love to hunt in this area....please keep our hunting alive in Tillamook County.

If you would like to reply to this e-mail, I would love to hear from you.

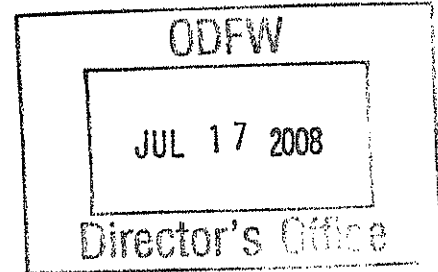
Richard Nash



OREGON HUNTERS ASSOCIATION

Helping Wildlife • Enhancing Habitat • Protecting Our Hunting Heritage

Oregon Department of Fish and Wildlife Commission
3406 Cherry Avenue, N.E.
Salem, Oregon 97303



July 14, 2008

Dear Oregon Department of Fish and Wildlife Commission:

This letter is a compilation of comments on the Oregon Black-tailed Deer Management plan from board members and members of the Oregon Hunters Association (OHA). First of all, we commend the committee that wrote this plan. The plan, the first long term, statewide management strategy for black-tailed deer is an ambitious one. OHA believes that within the framework of this plan, the department has put together a direction for five years that will emphasize good management practices and give us the data we need to determine the most effective way to manage Oregon's black-tailed deer population into the future.

The Oregon Hunters Association would like to submit the following comments to the Oregon Black-tailed Deer Management Plan:

1. **Hunter Recruitment:** Hunter recruitment is identified as a concern on page 19 under "Hunter Recruitment". Actions to address this concern are not identified in the "Issues and Strategies" section of the plan. OHA recommends the following to be added in the "Issues and Strategies" section of the plan.

- Objective: Increase youth hunting opportunities.
- Proposed Strategy: Continue to identify and implement opportunities for youth hunts.

2. **Land Owner Preference Tags:** The plan states LOP tags provide an opportunity for landowners to address property damage caused by deer on their property. The problem with this is that ODFW does not confirm crop damage on a consistent basis prior to issuing the LOP tag. The plan does not suggest that ODFW will evaluate all options to address the complaint prior to issuing an LOP tag. Actions to address these concerns are not identified in the "Issues and Strategies" section of the plan. OHA recommends the following to be added in the "Issues and Strategies" section of the plan.

- Objective: Ensure that LOP tags are issued for the intended purpose only.
- Strategy: ODFW will thoroughly evaluate and document each damage claim to determine eligibility for a LOP tag. Once a claim has been verified, ODFW shall then determine which management tool is the most effective to address the damage. (i.e., fencing, Master Hunter Hunt, Youth Hunt, etc.) Such evaluations will be available for public review.

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3. **Predator Control; Issue 4, Proposed Strategies, Item 1d:** The current language states "Coordinate predator management activities to be consistent with the Oregon Cougar Management Plan and the Oregon Black Bear Management Plan." The words "and implement" should be inserted after Coordinate.

4. **General Population Concerns.** While we have already addressed the issue of predator control in our comments we would like to add that somewhere in the plan we might want to address "an approach to limiting poachers". OHA believes that poachers are a big threat to our populations of deer and elk. We would like to see this concern addressed somewhere in the plan.

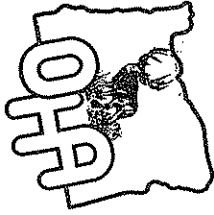
5. **Data Collection Methods: Issues and Strategies Section.** OHA agrees with the language in the plan that a consistent and reliable data collection method needs to be developed to help determine reliable herd compensation data. OHA asks that such a system be implemented.

This concludes our comments on the proposed Black-tailed Deer Management Plan. If you have any questions please contact Fred Walasavage at 541.980.2503 or our lobbyist Al Elkins at 503.780.6824.

Sincerely,



Fred Craig
President, Oregon Hunters Association



OREGON HUNTERS ASSOCIATION
P.O. BOX 1706
MEDFORD, OR 97501

EST. 1911. 2008

JUL 17 2008

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** CARRIER PERMIT NO. 603285 **
** OFFICE OF THE POSTMASTER GENERAL **
** ALBANY, NY 12242 **

THIS LETTER IS IN RESPONSE TO
YOUR BLACK-TAIL DEER MANAGEMENT
PLAN. I WOULD HOPE YOU WOULD LOOK
INTO THE POSSIBILITY OF THE EFFECT
OF HERBICIDES ON THE DOWN TURN
IN DEER NUMBERS. THERE WAS A
STUDY ON THE EFFECTS HERBICIDES
CAUSING WOMEN TO HAVE MIS-
CARRIAGES. AND I BELIEVE,
HERBICIDES ARE HAVING THIS SAME
EFFECT ON DEER AND THE LOSS OF
A LARGE AMOUNT OF THEIR BROODSE.

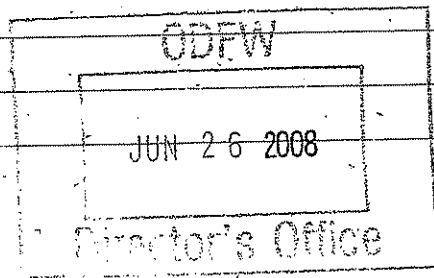
I HAVE NOTICE ON MY HUNTS
THAT IN SOME AREAS WHICH HAVE
BEEN CLEAR CUT, THAT THE VINE MAPLE
THAT IS ONE OF MAIN BRUSH THAT
COMES IN, IS NO LONGER IN AS
GREAT IN NUMBER AS IT BEEN IN
THE PAST. AND I BELIEVE IS
HURTING THE HEALTH OF DEER GETTING
POOR NUTRITION. AND I THINK
HERBICIDES ARE HAVING A CONSIDER

EFFECT ON NUMBERS OF DEER,
THESE HERBICIDES ARE BEING ABSORBED
INTO THEIR BODIES & ORGANS, THROUGH
WHAT REMAINS OF THEIR BROWSE AND
DRINKING WATER.

I WOULD HOPE THIS STUDY DOES NOT
OVERLOOK WHAT I BELIEVE, AND MANY
OF MY HUNTER FRIENDS, NOW BELIEVE
IS A SERIOUS CONCERN, BEING OVERLOOKED
MAYBE THE HAIRLOSS PROBLEM IN
LARGE IS BECAUSE ~~THE~~ THE
IMMUNE SYSTEM IS BEING HARMED BY POOR
NUTRITION.

THANK YOU.

James A. Billings



KAY VARUSKA
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June 25, 2008

To ODFW,

It seems odd to me that the declining blacktail deer population was noticed by ODFW in the mid 1980's and no solution was purposed then before the situation was in crises. Since I started hunting in the mid 50's I too saw the habitat decline, the Tillamook Burn for example, reforested it self. But as hunters became aware of the blacktail problem we asked ODFW to stop the doe hunting at least until the problem was addressed or solved , we were ignored.

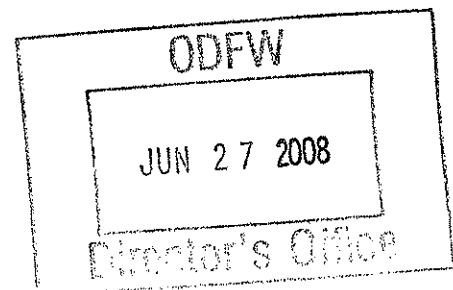
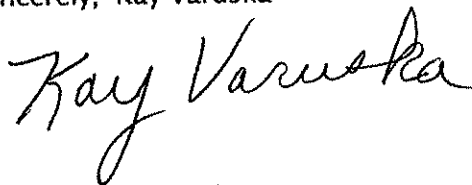
This June my hunting partner and I completed the Hunter Education Instructor's program and we learned about Carrying Capacity as did the young students.

The book we used (Today's in Oregon Hunters) and in it described the Carrying capacity as the number of animals the habitat can support all year long. The carrying capacity of certain tract of land can vary from year to year. It can be changed by nature or humans. If the conditions are balanced, game animals will produce a surplus, which can be harvested on an annual, sustainable basis.

We believe humans are more responsible than nature for the declining populations because of the doe hunts that are still to this day being allowed. Because of predators , poaching, doe hunts and disease our blacktail deer population will continue to decline. As I see it predation and disease are nature causes, poaching and doe hunts are human causes of blacktail deer decline.

In the recent past our blacktail season was shortened for the protection of the bucks. Time to protect our does with no hunting policy.
Lets discontinue the doe hunts for a 5 year period to see if there is an increase in the population.

Sincerely, Kay Varuska





OFIC

Oregon Forest Industries Council

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P.O. Box 12826 Salem, Oregon 97309 / Phone 503/371-2942 / Fax 503/371-6223

BlackTail

July 1, 2008

Ron Anglin - Wildlife Division Administrator
Larry Cooper - Deputy Wildlife Division Administrator
Tom Thornton - Game Program Manager
Pete Test - Deer/Elk, Cervid Holding & Propagation

Oregon Department of Fish & Wildlife
3406 Cherry Avenue N.E.
Salem, OR 97303-4924

Re: Black-tailed Deer Management Plan Comments

Gentlemen:

Thank you for the opportunity to submit comments on the Draft Black-tailed Deer Management Plan (Plan). We greatly appreciate the extension of time to allow us to coordinate comments from our members. OFIC members own, operate, and manage approximately 5 million acres of timberland almost exclusively within black-tailed deer habitat. This plan has created a great deal of interest and concern among our members. We will attempt to convey the sentiment shared by most of our members plus provide some specific commentary submitted by some reviewers.

The Plan has come a long way from the initial versions. ODF&W staff has worked with OFIC staff through three previous edits to date. We feel the current version has many significant improvements that convey a more balanced representation of the situation.

However, our members, as well as affiliated scientific community cooperators, have provided us consistent input that additional balance is needed in the Plan and that the lack of scientific evidence is still a major concern. In our opinion, the supporting evidence of the current status is weak and investigation that is presented into the potential causes is not persuasive. We do not feel the plan should be approved by the Commission until revised.

OFIC received feedback from roughly 20 individuals, both members and affiliated scientists. Feedback was remarkably consistent. A few select passages (mostly from email responses) have been "cut and pasted" below to illustrate the sentiments from the field personnel.

- ❖ Thinking about the suggestion that increased herbicide use has diminished early seral habitat, it is interesting that they did not go into the quality issue. Since most industrial lands are sprayed for herbaceous species for 2 years and then allowed to grow, it would seem that overall forage *quantity* would be sufficient (after year 2).
- ❖ "Increase clear-cutting on federal lands."
- ❖ This report seems to point out the fact that private land owners are the ones creating most of all the black-tail habitat these days. As land managers with our primary goal of timber production, our silvicultural tools are being taken away from us slowly by an ignorant public and overreaching public agencies. Folks need to understand that regulations may sometimes appear to have good intentions, a lot of times have many more unintended consequences. The Dept. should be working to make it easier for us to do our jobs so we can create more black-tail deer habitat as well as getting the feds back to creating habitat to reduce the damage from the "declining" populations concentrating on our managed lands.
- ❖ A portion of their report reads, "increasing the rate of growth through genetic modifications". Seedlings in the PNW are not genetically modified, they are genetically improved. Semantics to some, but a very important distinction to make. The genetics of conifer seedlings are not modified in any way. Instead, we select superior parents related to volume gain and use them for operational deployment.
- ❖ To ODF&W's credit, they fully acknowledge in their draft report that non-management of federal forests is a major part of this problem. From their linear view of the world, however, they just see declining populations with quality/quantity of habitat fingered as the culprit, and they calculate the odds of changing the feds behavior as roughly zero and the odds of changing our behavior as somewhat greater than zero. So that's where the emphasis will likely be going forward.
- ❖ ODFW plan for black tailed deer and their concern about the use of herbicides in preparing private forest lands for successful reforestation. I know that OFIC is working to put that practice into the context of federal lands providing little or no early seral conditions that would support deer and elk. The failure of the federal land management program must be a MAJOR factor in the decline of westside deer and elk populations. Hopefully, private lands will not once again become the scapegoat for the failures of federal forests management.
- ❖ The leading cause of lack of management of federal lands appears to be in protection of habitat for late succession forest species. I thought the management objectives for federal lands was to manage for multiple use. Shouldn't there be an effort (requirement) on these lands to provide habitat for early seral species as well?

- ❖ Conflict seems to come from perceptions that current forest management practices are contributing to the lack of forage but dedication to be consistent with the primary uses of the land remains a primary theme? Growing trees is the primary use of our lands.
- ❖ P20- under Management decisions (1) & (6) reference "optimum" levels and benefits with no description or expectation of optimum. (2) "To develop and manage the lands and waters of this state in a manner that will enhance the production and public enjoyment of wildlife." Where does the authority for ODF&W to "manage" the lands of the state?
- ❖ Until habitat availability increases, hopefully on federal lands, shouldn't populations be managed for current availability and conditions?

Additional comments from Scientists:

- Be consistent with the use of years 1908's or 1980s. In the scientific literature there is no " ' ".
- Be consistent with the use of scientific names. Plants always have the associated names but some animals are missing the names (e.g. pg 3, 8, 12).
- Data to support more of your claims (especially declining populations and the influence of predation) would be helpful.
- Most of the citations, especially on habitat, are very old (> 20 years).
 - Is there really nothing new?
 - What about information from the telemetry studies mentioned?
 - In addition, even some information on mule deer or black-tailed deer in other areas (where similar management is occurring) would be beneficial.
- I did a quick (10 minute) look through a database, and came up with a handful of citations that might be useful:
 - 2005 The Starkey Project: A synthesis of long-term studies of elk and mule deer.
 - 2004 (v 69) Transactions of the NW Wildlife and Natural Resource Conference (several papers may be applicable).
 - J. Mammal 84:1076-1088 (2003 Starkey study).
 - Journal of Wildlife Management 2002 66:729-736. Peek et al., south-central deer population estimates.
 - ****McCorquodale 1999. Columbian black-tailed deer habitat in Washington (NW Science 73:1-11).

Specific comments:

- p5 - State what was used specifically in the population model.
- p6 - Spell out DHLS the first time.
- p8 - No data to back up predation. Numbers would be helpful.
- Figure 5 and 6 not listed in the text.
- p15 - First mention of damage, but do not really define until later in the manuscript. I would recommend defining the problem when it is first mentioned.
- p16 second paragraph - why is the 2000 information listed under the 1990 heading? Check dates (2005-2005?)
- p17 - Last sentence does not really support Fig. 9
- p20 - second paragraph- Again state that population are declining but do not offer any support or information on what the trend is based on.
- p30 - Hazing- What is "enough acreage"?
- p34 - Really think you need to add some more information to demonstrate that habitat first is related to the decline (citations) and that second acreage in the seral stage has drastically declined. The point is not strong enough if that is you major premise.
- p42 - What about determining management levels (populations) that you wish to sustain? You mention that populations have declined, but what do you want to manage the population to?

Additional OFIC Staff comments:

P34 - Forest and Vegetation Management 4th bullet point: "Reforestation prescriptions that do not produce optimal browse species and conditions." How does this statement fit with a commitment to be consistent with respecting the Primary Uses of the Land?

P42 - Proposed Strategies:

1) Support and purse (**pursue**) collaborative habitat management research opportunities to investigate

P43 - Issue 3., Objectives:

5) Ensure continued funding for Department and cooperative (**collaborative**) research on black-tailed deer.

In Summary:

We would like to reiterate that we appreciate the progress to date. Our members, seeing this for the first time, reacted negatively to perceived criticisms of their management approaches. This reaction is similar to our initial response: the connection of the perceived BTD population decline to current forest management

practices seem to be based more on conjecture and opinion rather than objective, quantifiable means.

We support using the initial 5-year Plan period to develop a strategy to cooperatively and collaboratively better define the situation, using more credible information and scientific evidence. Special emphasis should be given to encouraging participation by federal agencies to assess opportunities to promote habitat development for early seral species. We also support development of additional and collaborative research into BTB population dynamics.

Thank you for your time and consideration of our comments. Please contact either of us if you have any questions, concerns or opportunities to review a final Plan.

Sincerely,



Mike Dykzeul
Director, Forest Protection



Chris Jarmer
Director, Forest Regulation

CC: Roy Elicker – Director, ODF&W
Curt Melcher – Deputy Director, ODF&W
Tally Patton – Weyerhaeuser, Co., OFIC Animal Damage Committee Chair
Jake Gibbs – Lone Rock Timber Co., OFIC Forest Management Policy
Committee Chair

Michelle Tate

Subject: FW: black tails

From: Kelly Robbins [mailto:sweetstrikes@gmail.com]

Sent: Saturday, June 14, 2008 9:05 AM

To: ODFW Comments

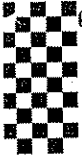
Subject: black tails

Dear sirs:

Regarding deer populations in Oregon, I believe that habitat may be a concern in some areas, but overall, predation and the killing off of females is a much larger concern. I grew up here in S.W. Oregon and spent so much time out and about in the country sides and mountains here with my father who was born on a homestead in the hills of eastern Coos County. I remember as a teen-ager (70's) hunting deer and being able to see deer in large numbers. Most people I knew would and could be very picky about the buck they would harvest. I remember that seeing 4, 5, and 6 bucks together was not unusual. As the years went by deer numbers declined. Doe killing in the units I hunted year after year took a toll on populations. The main trails and crossings that were cut up with tracks in my youth were becoming less and less used. Seeing deer in numbers become a thing of the past. Now with the laws that do not allow the taking of bear and cougar by the dog people, numbers of deer have really fell sharply. In places where deer were thriving in prime habitats, where the trails and tracks were obvious indicators of healthy populations, we started seeing more cat sign than anything else. In my view, you can not kill female deer in heavy numbers year after year and protect or sharply limit the taking of predators and expect to have healthy populations of deer. It just doesn't make since. Deer management and predator management have to work together. You cannot thin one and let the other flourish. In our time, natural balances are not available. We are to envolved.

I hope my comments will provoke some thought on matters other than habitat. We have prime habitat; too much predation and selling too many doe tags in the wrong places is what is wrong here.

Thank you.



Fax cover

To - ODFW

From - Dwayne Storum

1009 Stoneridge Loop, Prineville, Or. 97754

Pages - 2

my fax - 541-447-6166.

Subject - Black Tail Management

Public Correspondence
Topic Black-tailed deer

6/8/08

ODFW:

Hi, my name is Dwain Storm; I retired as a timber cutter on the South Coast of Oregon. I cut timber for thirty years, from California to Alaska, but mostly on the south coast. The Millicoma tree farm, Smith River drainage, Elliott state forest and many more.

I'm writing you in response to the article in the Oregonian about black tailed deer conservation.

I started cutting in the mid seventies, black tails were easy to see coming and going to work. Later into the early nineties you could go several days without seeing a deer. By the time I retired, seeing a back tail doe from one end of Weyerhaeuser to the other was hard to do.

There isn't anyone who works in the woods on the south coast who wouldn't agree with me. There just isn't any deer there anymore. Where did they all go?

You can reach me by e-mail, dweinstorm@hotmail.com.

I think it's a great deal to find a way to get the numbers back up. Thanks, Dwain Storm.

Liz Bueffel

From: Peter Test
Sent: Monday, June 09, 2008 1:57 PM
To: Liz Bueffel
Subject: FW: Black Tailed Deer Management

Black-tailed deer management plan comment

Pete Test
Staff Biologist
Deer & Elk Program Coordinator
(503) 947-6319
peter.s.test@state.or.us

From: ODFW Comments
Sent: Monday, June 09, 2008 1:50 PM
To: Peter Test
Subject: FW: Black Tailed Deer Management

From: Dave & Christa Wood [mailto:davechrista@gmail.com]
Sent: Sunday, June 08, 2008 7:56 AM
To: ODFW Comments
Subject: Black Tailed Deer Management

If you want to save and increase the population of Black Tail Deer, you must hunt more cougar.
Cougar are killing hundreds of deer and elk.
Re-introduce hunting cougar with dogs, there is no other way to keep cougar under control. Also, if
wolves start populating oregon forest, the deer and elk are doomed.

1sg.USA.Ret. D.Wood
Rainbow, ORegon
(certified hunting instructor (Europe)
bowhunter instructor (National Bowhunter Education Foundation)
Current IFAA, World Champion Bow Hunter Senior Division

--

daw

Rainbow

Democracy is: We the Sheepel
Republic is: "We the People"

Liz Bueffel

From: Peter Test
Sent: Monday, June 09, 2008 1:55 PM
To: Liz Bueffel
Subject: FW: Blacktail numbers

Black-tailed deer plan comments.

Pete Test
Staff Biologist
Deer & Elk Program Coordinator
(503) 947-6319
peter.s.test@state.or.us

From: ODFW Comments
Sent: Monday, June 09, 2008 1:50 PM
To: Peter Test
Subject: FW: Blacktail numbers

From: James Kelly [mailto:jpk7163@yahoo.com]
Sent: Sunday, June 08, 2008 11:54 AM
To: ODFW Comments
Subject: Blacktail numbers

I have been an avid hunter in the Tillamook State Forest for over 45 years and have personally watched the decline in numbers of Blacktail Deer, and have identified a obvious casue and effect pattern. In the past years when numbers were at their highest, slash burning was done to scarify the land before replanting, a natural use of fire, a natural part of the forest ecology. I've taken a number of animals from the units while they were still smoking. For the next 10 years the population of all animals would abound. Present practices call for the use of long life herbicides to be used in place of burning, some with an effective active life of years to control the natural growth of plants to give the replanted trees a growth boost. The plants affected by the herbicides are the vital browse that feed the blacktail and elk populations. It's really basic ...no feed, no animals. In the good old days, a new clear cut would be a magnet for animals, being totally cut up with tracks, and packed with animals. Today a clear cut after spraying is a wasteland and are you very lucky to even find a single set of tracks in the entire unit, to see animals is even rarer. I believe that if you track the population numbers and match them with the use of herbicides, the pattern is obvious. As I said before, no feed, no animals. If you want to recapture the populations of deer and elk, then you must reconsider the ground preparation practices after logging and eliminate the use of long life herbicides and seriously reconsider the practice of controlled burning. To do otherwise in my opinion would be a waste of time and effort, and further the decline in population numbers. To enhance my point all one has to do is look at the whitetail populations in other area where feed is managed to enhance deer numbers.

Thank you for your consideration

Pat Kelly

1410 McCormick Lp

Tillamook, Or 97141

Liz Bueffel

From: Peter Test
Sent: Monday, June 09, 2008 1:51 PM
To: Liz Bueffel
Subject: FW: blacktail deer proposal

Black-tailed deer plan comment.

Pete Test
Staff Biologist
Deer & Elk Program Coordinator
(503) 947-6319
peter.s.test@state.or.us

From: ODFW Comments
Sent: Monday, June 09, 2008 1:50 PM
To: Peter Test
Subject: FW: blacktail deer proposal

From: Al and Lona Pierce [mailto:alkpierce@colcenter.org]
Sent: Sunday, June 08, 2008 1:04 PM
To: ODFW Comments
Subject: blacktail deer proposal

June 8, 2008

Lona Pierce
56498 Crest Drive
Warren, OR 97053

To ODFW,

I request that this letter be Included for public comment on blacktail deer management draft planning

Blacktail deer numbers were very high a decade ago in Columbia County. They were very visible, hit by cars often (a hazard), deer tracks were everywhere, and evidence of their browsing was abundant. The recent bout of lice-induced hair loss and death made a noticeable dent in deer numbers, although in the last two years all indications are they are increasing once again. Collecting data about their population by wildlife biologists is very useful. I support gathering accurate data on deer fluctuations.

Biologists need to ascertain not only deer numbers, but overall habitat health. If a biologist doesn't know a trillium from a dandelion, they have no business determining if deer populations are healthy, low, or too high. Deer population data should not just be a scorecard of X number of deer in Unit X. Habitat health must be monitored, as well. How many trilliums or tiger lilies are in Unit X? What is the condition of shrubs like serviceberry or currant? Are twigs heavily browsed, or are flower heads all sniped off? Do wet areas at summer's end look healthy, or ragged?

Oregon must sustain a good variety of habitat for all native plants and animals -- not just big game. If favored plants are being browsed down by deer so heavily the plant population suffers, there are too many deer in the vicinity. Reducing predators to boost deer numbers artificially high is unacceptable. Deer with no predation are like a herd of confined livestock. All the plants are ravaged. Coyotes consume far more rodents than deer, and

are necessary components to most wildlands that are now missing wolves. Cougar make it harder for hunters to bag an unwary deer. I am not in favor of killing off predators to benefit spoiled hunters who want an easy kill. Deer are a problem with cultivated crops, tree seedlings, and landscaping. More deer is not always better, except to a small proportion of people who hunt.

Deer numbers must not be kept at a peak at all times. The habitat cannot support that. It also makes deer vulnerable to disease and starvation in harsh winters.

We need good hunting opportunities and good access, but we don't need a return to ultra-high deer numbers, resulting in sick and dying deer with overbrowsed, species-poor habitat. That also doesn't mean maintaining effortless hunting of pampered deer that act more like livestock than wild animals.

Thank you for the opportunity to comment.

Lona Pierce

Michelle Tate

Subject: FW: Public comment on Blacktail Deer draft proposal.

From: Ryan Aiello [mailto:aiellos6@centurytel.net]
Sent: Monday, June 09, 2008 9:42 PM
To: ODFW Comments
Subject: Public comment on Blacktail Deer draft proposal.

To whom it may concern,
Here are the three main things that I feel will personally help the Blacktail population. They are also in order of priority. Thanks for your time.

- 1) Eliminate all doe seasons (except for youth hunts). I personally think that only youth should be allowed a doe other than that, for the next seven to ten years totally eliminate them.
- 2) Allow cougar hunters to use dogs when hunting. The cougar population has exploded and they are getting less fearful of man.
- 3) Antler restrictions on General season hunts. I havent really thought of what the restriction should be but we need to get away from blasting every forked horn that we see. Perhaps three point or better?? Just a thought.

I feel that all three of these would make a considerable boost in the blacktail population. Thanks again for asking for our thoughts. Please keep us informed of what decisions are made. Take care.

Ryan Aiello

Michelle Tate

Subject: FW: BlackTailed Deer Management Plan

-----Original Message-----

From: stephanie bellingham [mailto:stephy1953@yahoo.com]
Sent: Monday, June 09, 2008 2:04 PM
To: ODFW Comments
Subject: BlackTailed Deer Management Plan

I'm curious if your plan might possibly be leaning towards tax incentives for people who have acreage where groups of deer live. We're in Tigard along the Tualatin River. We usually have about 5 fawns per year with a herd size of no less than 15. Lots of harmony taking place here with the deer. (and not a flower in the yard I might add....the deer won with the landscaping possiblilites which is fine). Thank you.

Michelle Tate

Subject: FW: Black tails

From: warren Schafer [mailto:wjscha@verizon.net]
Sent: Monday, June 09, 2008 1:00 PM
To: ODFW Comments
Subject: Black tails

The OREGONIAN, Sunday June 8, 2008, "Agency drafts plan to boost black-tail count" demonstrates narrow, biased perspective of an alledged problem. Deer are a problem, be it Black-tailed, White-tailed, or Mule deer. Man, with his infinite wisdom has shifted the balance of nature, not only as relates to deer, but much of nature. The domestic house cat has decimated the quail. The seal poses problem in maintaining salmon count. To protect deer, the cougar has been practically eliminated. And so with many other competing species. If ODFWL were to serve the entire community, wild life included, a good starter would to be: (1) establish equal season on seal and salmon; (2) establish equal season on domestsic cats and quail; (3) re-introduce cougar to the Willamete Valley. The result would be (1) better salmon fishing, (2) better quail hunting; (3) better vegetable gardens, more beautiful rose gardens. Warren Schafer, 12150 SE 117th Ave., Happy Valley, OR 97086 Phone (503) 698 2324

Hand
7/6/08

From: Glen & Paula MC*CLEAN [mailto:mccleans1@msn.com]
Sent: Sunday, July 06, 2008 8:46 PM
To: ODFW Comments
Subject: Black Tail Deer

To Whom It May Concern,
I am writing this letter in hopes that my voice will be heard when it comes time for the commission to meet regarding The Black Tailed Deer Management Plan.

I think it is a wonderful idea to get a better idea concerning the health, numbers, and habitat for this game animal. What I am concerned about however, is further regulation regarding the hunting of this game animal.

The prospect of putting in for a draw on both sides of the state, and not being selected for a hunt is crushing. I have 4 children, 2 are currently able to hunt with me, with 2 more coming of age in the next 3 years. The thought of having to spend the additional money for a draw, for 5 of us, and not being selected is almost unthinkable, not to mention maybe cost prohibitive. Without a general season, I feel I might be losing out on passing on the hunting tradition to my children, or teaching that as long as you have money, and luck, you can enjoy the tradition, but without one or the other...

Without a general season over here on the east side of the state, I am already forced to spend time and money to hunt in the west, instead of being able to hunt locally, which would help my local economy more. If there is no general season on either side of the state, what do I do?

Please consider all aspects of the picture before deciding on a coarse of action, but by all means, you have my endorsement for the five year data gathering plan.

Sincerely,

Glen McClean
Lic# 08-01358458-5
ODFW ID # 414095

Black
Tally

From: Patton, Tally [mailto:Tally.Patton@weyerhaeuser.com]
Sent: Monday, July 07, 2008 10:33 AM
To: Larry Cooper; Chris Jarmer; Ronald Anglin; Thomas Thornton; Peter Test
Cc: Roy Elicker; MELCHER Curt; jgibbs@lrtco.com; Mike Dykzeul
Subject: RE: BTB Comments

Larry,

I believe we have an opportunity to work on some research projects concerning black-tailed deer habitat. As you know we have the Olympia Field Station contacts that your department has worked with us doing black bear research and beaver research. I believe that we have the ability to work with NCASI and Olympia field station staff, and even have OSU dove tail with the issue of habitat needs and quality. We need to pool our resources and use the research community effectively- and also our research dollars. We need to quit making conjectures and get science based information so that we can become truly functional in managing the black-tailed deer populations effectively. We also need to work very hard to have our federal neighbors provide habitat for the our deer populations and become an integral part of this management plan. I will be very happy to support the Department in any way I can to put these ideas into motion.

Tally

Tally Patton
Forester
(541)744-4648
P.O. Box 1819
Eugene, OR 97440

From: Larry Cooper [mailto:Larry.D.Cooper@state.or.us]
Sent: Tuesday, July 01, 2008 11:55 AM
To: Chris Jarmer; Ronald Anglin; Thomas Thornton; Peter Test
Cc: Roy Elicker; MELCHER Curt; Patton, Tally; jgibbs@lrtco.com; Mike Dykzeul
Subject: RE: BTB Comments

Thanks Chris for taking the time to provide your collective comments. We will work with Tom and Pete to make the necessary corrections to the Plan.

Larry

From: Chris Jarmer [mailto:Chris@ofic.com]
Sent: Tuesday, July 01, 2008 10:17 AM
To: Ronald Anglin; Larry Cooper; Thomas Thornton; Peter Test
Cc: Roy Elicker; MELCHER Curt; tally.patton@weyerhaeuser.com; jgibbs@lrtco.com; Mike

Dykzeul

Subject: BTD Comments

Everyone

Attached are OFIC's comments on the Draft Black-tailed Deer Management Plan. Thanks again for your patience and for working with us over the last few months.

CBJ

Chris Jarmer
Oregon Forest Industries Council
(503) 586-1243

Michelle Tate

Subject: FW: deer & elk populations allocated to hunters

From: Dave Russell [mailto:Dave.Russell@fordhamgoodfellow.com]
Sent: Monday, July 07, 2008 11:19 AM
To: ODFW Info
Subject: FW: deer & elk populations allocated to hunters

From: Dave Russell
Sent: Monday, July 07, 2008 11:13 AM
To: 'dr_lr_russell@yahoo.com'
Subject: deer & elk populations allocated to hunters

As part of your plan for managing blacktail deer as well as other deer and elk I believe that you should publish a schedule of the total of each population and allocate it between the various predators that are harvesting them. Specifically this should include bears, cougars, poachers, and licensed hunters that buy tags.

What management plans exist to reduce the number of predators which have increased to three or four times what they were ten years ago.

Finally, a report a few years ago stated that there used to be 144,000 black tail hunters. Your report today says that there are only 72,000. Will your current plan increase the deer population so that there will again be enough to increase the tags issued?

Thank You,
David A Russell

RECEIVED

SEP 25 2008

P O Box 487
Corvallis, Oregon 97339-0487
September 24, 2008

ODFW WILDLIFE DIVISION

Oregon Department of Fish and Wildlife
3406 Cherry Avenue NE
Salem, Oregon 97303-4924

Subject: Personal comments from Chuck Woosley on the Oregon Black-tailed Deer Management Plan dated August 8, 2008.

Attention: Mr. Pete Test:

Thank you for the opportunity to personally comment on this management plan for black-tailed deer as well as the opportunity to represent the Oregon Division of the Izaak Walton League of America on the Review Committee for this Plan.

Adoption and implementation of the management concepts proposed in the Oregon Black-tailed Deer Management Plan dated August 8, 2008 will contribute to the improved scientific management of Oregon's black-tailed deer. I further support the adoption and implementation of this Plan as it is far past the time for a black-tailed deer management plan to be in place and used. The development of a black-tailed deer management plan for Oregon was initiated in or before 2002 (I initially commented on a draft plan dated July 12, 2002). To me the lengthy delays in the development of this plan is an affirmation as to the Oregon Department of Fish and Wildlife's (ODFW) insufficient personnel and funding. Historically, it has been my observation and opinion that the ODFW has not had sufficient personnel or financial resources to fully achieve all of the statutory responsibilities placed on the Department. Therefore, the Department has not been able to carry out some of the strategies and objectives in big game management plans as well as provisions in administrative rules. I further feel that it is imperative for the Department and its constituents to seek and obtain increased funding in-order to more fully achieve statutory responsibilities and species management plan provisions.

Because I perceive that the quantity of personnel and financial resources will be inadequate to fully carry-out all strategies etc. of this Plan, I suggest priorities be established for implementing the Plan. I suggest the following be given highest priorities for implementation:

- The protection and improvement of habitat.
- Implementation of the Sex Age Kill model for population estimation.
- Development of population management objectives (MO's).
- Increased advocacy for improving the needs for all wildlife, including black-tailed

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WILDLIFE DIVISION

deer, when dealing with all land managers and natural resource administrators.

- Collaborating scientifically based research with other competent research scientists.

Items to which I suggest a lower priority include:

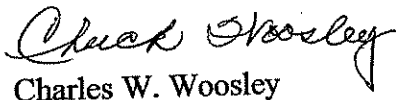
- Utilize ODFW's Access and Habitat Program whenever possible.
- Coordinating the Black-tailed Deer Management Plan with:
 - The Oregon Mule Deer Management Plan.
 - The Oregon Elk Management Plan.
 - The Oregon Black Bear Management Plan.
 - The Oregon Cougar Management Plan.
- Incorporate the use of volunteers whenever possible.

I also suggest the word **parasites** be added to the following text:

- Page i of the Executive Summary: Last sentence of the fifth paragraph from the bottom of the page. This sentence would then read: Since the 1990's the black-tailed deer population has been declining in part because of the loss of habitat, the introduction of diseases and **parasites**, as well as the increased presence of predators.
- Page 2, Introduction: Last sentence of the third paragraph from the bottom of the page: This sentence would then read: The reduction is likely related to the quality and quantity of habitat, increased incidences of disease, and **parasites**, as well as higher rates of predation.

Thank you very much for your consideration of my thoughts.

Kindest regards,


Charles W. Woosley

Michelle Tate

From: Peter Test
Sent: Friday, October 10, 2008 1:41 PM
To: Michelle Tate
Subject: FW: BTD plan comments
Attachments: Non-native language for BTD Plan.doc

Pete Test
Staff Biologist
Deer & Elk Program Coordinator
(503) 947-6319
peter.s.test@state.or.us

From: DeWaine Jackson
Sent: Thursday, September 18, 2008 4:09 PM
To: Thomas Thornton; Peter Test
Cc: Allbritten, Marnie
Subject: BTD plan comments

Gentlemen: just received some comments and concerns about text within the BTD plan. (1) Page 38 under Invasive Plant Mgt – the concern is that many beneficial plants could be interpreted as invasive when we do not specify the definition of an invasive plant. In that regard, I have attached a proposed revision to the paragraph. This is a real issue that we are currently “battling” BLM with on the North Bank Habitat Mgt Area – they are preventing use of ODFW’s elk forage mix. (2) Page 39 under Predator Mgt – The first sentence may be inappropriate and without sustentative data. Let’s just delete it. And the first sentence of the third paragraph. We should probably not admit that we do not have population data for bobcats – there are groups looking for these types of statements to shut down our trapping. Again let’s just delete the sentence.

DeWaine Jackson
Acting Umpqua Watershed Mgr
ODFW Regional Office - Roseburg
541-440-3353

Possible revisions to paragraph on Invasive Plant Management on page 38.

For the purposes of this document, Invasive Plants are defined as any plant listed on the Oregon Invasive Species Council's "100 Worst" list or a non-native plant that has the ability to spread 10% beyond its origination area within 2 years and maintain a 75% total density over a 5 year period.

There are non-native plants that benefit black-tailed deer and unless and until an equally beneficial native plant is available in their habitat, beneficial non-natives should be tolerated.



Izaak Walton League of America

Oregon Division

15056 Quall Rd NE, Silverton, OR 97381

DEFENDERS OF SOIL, AIR, WOODS, WATERS AND WILDLIFE

Oregon Department of Fish and Wildlife
Attn: Wildlife Division
3406 Cherry Ave NE
Salem, OR 97303-4924

OCT 14 2008

ODFW

Subj: Oregon Black-tailed Deer Management Plan dated August 8, 2008

Attn: Mr. Pete Test

10 Oct 2008

The Oregon Division of the Izaak Walton League of America (IWLA) would like to thank the Oregon Department of Fish and Wildlife (ODFW) for the privilege of being represented on the Review Committee and to comment on this significant plan for the scientific management of Oregon's important black-tailed deer.

The League considers the adoption and implementation of this Plan to be a step forward for the scientific management of this natural resource.

Even though IWLA supports the adoption and implementation of this plan, we seriously question whether or not ODFW can further stretch its personnel and limited financial resources to fully accomplish the stated Objectives and to achieve the Proposed Strategies. The IWLA further feels it is imperative for the sports community (including the IWLA) to support the Oregon Fish and Wildlife Commission and ODFW to seek and obtain funding (revenue) in-order to more fully accomplish all of the Department's statutory responsibilities.

The following are the IWLA's comments regarding specific Issues, Objectives and Proposed Strategies identified in the Plan dated August 8, 2008.

ISSUE #1: Black-tailed deer habitat availability and sustainability.

- Proposed Strategy #4:

The IWLA encourages the protection and the enhancement of existing habitat as well as the purchase of critical habitat areas whenever it is possible and practical.

- Proposed Strategy #7:

1. The IWLA encourages not only the identifying of research needs but also the implementation. The IWLA further encourages ODFW to collaborate with competent organizations on scientifically based research whenever possible and practical.

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OCT 15 2008

WILDLIFE DIVISION

2. The IWLA suggests that ODFW increase its advocacy for obtaining the needs of all wildlife (including black-tailed deer) when dealing with all land managers as a 12th strategy for this issue.

ISSUE #2: Relationship of habit quantity and quality to black-tailed deer populations.

- Proposed Strategy #1:

The IWLA encourages ODFW to vigorously pursue the implementation and continuation of this strategy as it has substantial potential for providing scientifically based information for improving black-tailed deer habitat.

ISSUE #3: Monitoring and evaluation protocols to assess black-tailed deer populations need to be updated and validated for Western Oregon.

- Proposed Objectives #'s 1 & 3:

1. The IWLA considers establishing the 5 year time line to be very desirable.

2. The IWLA suggests the addition of a 6th objective: Cooperate and collaborate black-tailed deer population monitoring and evaluation with other competent entities.

- Proposed Strategy #3:

The IWLA encourages ODFW to give high priority to the developing and implementation of a Sex Age Kill model for population estimation.

ISSUE #5: Recreational use (primarily hunting and viewing) of black-tailed deer is declining.

The IWLA suggests utilizing the Access and Habitat Program to the fullest extent possible as well as seeking a legislative fee increase for this hunter financed program as a 7th strategy

ISSUE #6: Introduction of exotic wildlife diseases that pose threats to black tailed deer and other native wildlife.

1. ODFW should seek approval and full funding for a third wildlife veterinarian position.

2. The scientific management of parasites should be addressed in the Objectives and Strategies of Issue 6 or elsewhere in the Plan.

IWLA also feels there is a need for the Black-tailed Deer Management Plan to be coordinated with:

1. The Oregon elk Management Plan
2. The Oregon Mule Deer Management Plan
3. The Oregon Black Bear Management Plan
4. The Oregon Cougar Management Plan