



OREGON HUNTERS ASSOCIATION

Protecting Oregon's Wildlife, Habitat and Hunting Heritage

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January 13, 2020

Chair Wahl, Commissioners, and Director Melcher,

The Oregon Hunters Association requests the Commission to direct staff to undertake a complete and thorough update to the Oregon Black-tailed Deer Management Plan. The plan was approved in 2008 with an established 5-year review timeline. At the current twelve-year mark, this timeline is sorely outdated.

Objective 4 of the 2008 Black-tailed Deer Management Plan states "Manage black-tailed deer populations to attempt to achieve escapement (buck ratios) and populations at benchmark levels while collecting information over the next five years to develop Management Objectives." In lieu of Management Objectives (MOs), the black-tailed deer population has since, and continues to be, managed using Benchmarks due to the 'inability of existing inventory and trend data to accurately estimate populations.' (Black-tailed Deer Management Plan, page 22)

In 2019, hunting regulations for the black-tailed species were changed in a substantial manner. This change, specific to spike deer, was met with concern from the hunting community but was approved for the 2020 season. The lack of consistent, reliable population estimates due to the notoriously secretive habits of the back-tailed species, coupled with an outdated management plan, create a level of uncertainty regarding unintended consequences from this change. The potential for a high level of hunter success and, conversely, damage to the population of an important big game species, gives us concern. It is our contention that such marked changes in the harvest regulations of a species should make biological sense based on population numbers, species health, and management objectives. We do realize that research on black tails is ongoing, and that this research has great potential to improve population survey accuracy.

With the hunting regulation changes approved and in place for 2020, and applying these new research findings, OHA asks that the Commission move forward with updating the management plan for black-tailed deer. The species is important to the hunting community and we value its conservation, management, and appropriate, science-based, harvest strategies.

Sincerely,

Fred Walasavage
Board Chairman



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January 6, 2020

RE: OHA input from Deer/Elk Workgroup session:

Dear Chair Wahl, F&W Commissioners, and Director Melcher,

The Oregon Hunters Association appreciated the opportunity to have met and discussed details of regulation changes on Dec. 4, 2019. This meeting was generally productive and did produce potentially effective dialogue on monitoring for hunter's concerns on the three major regulation changes for mule deer, black tail deer, and general cow elk hunts.

OHA feels the aspect that was not clearly defined was the biological thresholds under which these hunts would be modified or discontinued. We did establish a good framework for going in that direction but never nailed-down the side bars for change when needed.

In looking at the three topic areas for monitoring, the late mule deer hunts are the most in need of more developed parameters for monitoring, beyond what we established at the one workgroup meeting. The most questionable new hunts are #143C in the John Day Canyon, 145A Fossil Unit #2, and Heppner Unit # 1. These three hunts will occur from Nov. 21 to Nov. 29. This time frame is a highly vulnerable one for mature mule deer bucks being late in the rut season.

According to the 2020 Big Game Regulations, the John Day Canyon hunt will offer 20 tags. This figure could easily exceed the number of bucks available along this segment of river corridor. Reports from hunters floating this stretch of canyon last year were that very few mule deer were observed, and no mature bucks were seen in that October hunt. These hunts will be attractive to the average deer hunter because of the unique late-hunt timing. It is hard to imagine a strong indication of hunter satisfaction given the likely need for preference point expenditure needed to draw this tag.

ODFW staff has indicated that this hunt is based primarily on unit-wide buck:doe ratios without much consideration of other population variables, hunter reports, and knowledge of the total number of bucks available for harvest. Staff indicated that buck numbers in these units are above MO's but failed to state how low the MO's are, and the effects from the overall decline in deer population. Given the dire situation of mule deer in many (or most) eastern Oregon units, offering this hunt does not seem like the best option for either improving deer numbers or increasing hunter opportunities.

Our "ask" of the Commission is to reevaluate how mule deer management is addressed on two scales: at the unit or subunit level, and then more broadly and comprehensively across the mule deer range of Eastern Oregon. Establishing population thresholds is applicable in both cases:

- Using the John Day Canyon hunt as a smaller scale "Threshold Example": If the Departments fall deer composition survey – for that sub-unit – only produces a count of 14 mature bucks then 20 tags should not be issued, so the action would be to proportionally reduce or cancel this late season hunt.

- For a broader scale, and given that most mule deer units are under Management Objective (MO), cut back on tag numbers to reflect the population status, or this larger scale “Threshold Example” would be if the population is at 75% of MO, then cut the tags available by 25%.

OHA recently received word that there would not be another stakeholder meeting with discussions on our concerns for defined population thresholds for holding hunts like these late ones for mule deer. We sincerely hope that the F&W Commission will be vigilant for biological variables, and acceptable thresholds, on any late season mule deer hunts proposed currently or in the future, and finally, to direct staff to look at the big picture for mule deer across their range in Eastern Oregon. As for new black tail deer regulations and the general cow elk hunts – these need to be reviewed annually and not simply left in place for 3-5 year periods without critical assessment of social, biological, and elk redistribution issues and effectiveness.

Jim Akenson
Sr. Conservation Director

Steve Hagan
NW Director & Board Member

OHA Work Group Representatives