

Responses to Public Comments

1. PETER FINNIE: Northern California Hunter

A. The primary goal to restore deer populations should be clearly identified. It's very unclear as to what this goal is. The California Deer Numbers chart on page 6 indicates that maybe a realistic deer populations goal should reflect those numbers identified during the early 1990's which would represent a total population of about 700,000 deer.

CDFW's Primary goal is conservation of the state's deer population. Obtaining baseline population estimates will be an important first step in determining future management actions. This information will be used in conjunction with habitat information to establish realistic population goals for each DCU.

B. Why are the Klamath Mountains and the Cascade Range Deer Conservation Units combined? Those deer in the Cascade Range east of Interstate 5 have, over the years, co-mingled with the mule deer herds adjacent to their eastern boundary. I would strongly request that the Cascade Range be removed from the Klamath Mountain Deer Conservation Unit and be established as a separate Cascade Range Deer Conservation Unit east of Interstate 5. The North Coast Deer Conservation Unit should reflect a true coastal vegetation type habitat that would be divided along the coastal mountain range from north to south creating an additional interior deer conservation unit.

The proposed DCU's are intended as a starting point. As we move forward with data collection efforts we will let information we gather on ecological function and environmental stressors guide conservation actions including the establishment of management boundaries and population goals.

C. On page 8 of the plan, it states the Department will focus on assessing existing deer hunt zone boundaries to determine overall similarities. This can be reasonably justified, however, reducing the number of zones is not acceptable. A good reference for this is how successful the X Zones have been since they were established from the old district one and three quarters zone with a 3 point or better rule. Any change in deer hunt zone boundaries should be clearly identified by habitat type and other biological information and not to obtain more "generalizable data"!

Any change in hunt zone boundaries would need to be validated by sound biological or enforcement reasons. Some zones were originally established to relieve hunting pressure. This would certainly need to be taken into consideration in deciding if changes in zone boundaries are warranted. As we gather biological data we may or may not be able to justify changing boundaries. When we talk about generalizable data, we mean data that is comparable at a landscape level.

D. Is the DCU Development and Implementation Schedule, identified on page 11, a realistic developmental timeframe?

The schedule was overly aggressive and a revised schedule has been developed and identified in the final Plan.

E. The DCU Plan Objectives, Population Management Objectives, Habitat Conservation Objectives and Monitoring Objectives, Adaptive Management Objectives, Applied Research Objectives and Outreach Objectives are very redundant and need to be consolidated and simplified. In closing, my overall assessment of the plan was somewhat disappointing given the extended time period the Department took to update the Deer Plan. It would be pertinent if the Department would schedule some scoping sessions with the general public to provide an opportunity for additional comments and input. Hopefully the above comments will be considered in the completion of this plan. I look forward to reviewing the revised plan.

This plan is a framework for development and implementation of the more specific DCU plans. The DCU plans will appear less redundant once specifics replace the general goals and objectives. Each draft DCU plan will be subject to extensive public review through public meetings and written comment periods.

2. GORDON LONG: Calfauna Foundation

A. First off, the most obvious item I noticed in this Plan is that the authors of the Plan are not presented. While you may have been the supervising official for this project, I'm sure this was a collaborative effort by many biologists within the Department. It would be transparent and prudent if a list of contributing authors would be added to this document.

This was a collaborative effort by wildlife staff from the entire department and that is why there was no author credited for the document. The plan is a CDFW plan.

B. Where is the research indicating that taking this Deer Conservation Unit (DCU) planning system is the proper approach to take? Going from a system that took into account 79 deer herd plans to ten DCU's is a complete paradigm shift in deer management.

The intent is to implement a new inventory of deer and deer habitats in the state. There is no research indicating that this is the wrong approach to take. Definition of individual herds dates back to the early 1950's (some even earlier than that). Because so many things have changed since then, we need to evaluate what is there and what forces are at work now. CDFW does not have the resources to conduct inventories of 79 different herds, nor maintain 79 different deer herd plans. In addition statistical results of 79 different areas would not be comparable or repeatable at the landscape level. What we can do is assess populations and conditions at the landscape level, conducting intense population estimates (by DCU) every five years. This will allow for repeatable, robust

data comparable across the state. Once we have completed the inventory we can analyze what population levels are, where they are going and what needs to be done. In other words, we want to let information we collect on ecological relationships and environmental stressors guide us in our conservation actions.

C. Additionally, the Department developed the California Wildlife Habitat Relationship System (CWHR) where 59 wildlife habitats were identified and described. If this plan is to be at least partially based on habitat, how can you reasonably lump 59 unique wildlife habitats into a habitat equation with only 10 DCU's?

One of the things we want to look at is how these habitats are distributed across the landscape and how deer are using them. DCU's are not exclusively delineated on habitats, but key habitats are/will be a key factor in DCU development through developing and implementing habitat mapping projects. Certainly habitats know no boundaries. Neither do deer, but how and when they use them is one of the keys to deer conservation. We used geomorphology and existing data on deer distribution as a rough guide to delineate DCU boundaries. As we develop and implement the DCU plans habitats and their distributions will be a part of deer conservation. This will help us determine if the DCU/hunt zone boundaries are appropriate for the population and management goals identified in the respective DCU plan or if they need to be changed.

D. This plan fails to adequately address predator concerns

Assessing the impacts of non-hunting mortality is one of the objectives in the framework and will be a component of each DCU plan. Non-hunting mortality includes mortality attributed to predation and will be an important factor to consider as population goals are developed.

3. LAMAR MATTHEWS: Valley Springs, CA

A. I feel that allowing hunters to purchase multiple tags for units (i.e. "D-5" 2 tags per season are allowed) could be revised to 1 single tag per unit.

Current State Law (FGC 4332) authorizes California deer hunters to take up to two deer per year. The law does not specify that the two tags must be in separate units. These types of management decisions will ultimately be publicly developed as part of the individual DCU plans.

B. Doe tags could be implemented for the reasons stated in the "Plan".

Limited doe hunts are currently being conducted mainly in the form of either-sex hunts. Collection and analysis of population data will help us to determine if more doe hunts are biologically justified. Each DCU plan will contain a decision matrix to identify conditions which, if met, will justify the proposal of an antlerless deer hunt.

C. Predator control mainly mountain lions being protected impact our deer herds and numbers in a negative way, an amount of tags could safely be distributed to control overpopulation of mountain lions.

The people of California voted against managing mountain lions through hunting with the passage of Proposition 117 in 1990. CDFW is conducting studies to assess the level of impact predators (including mountain lions) have on the state's deer (and other species) populations. However, there is no mechanism to control mountain lion predation on other wildlife.

4. PAUL CHAPPELL – Lassen County Fish and Game Commission

A. The existence of this plan was not known to the Lassen County Fish & Game Commission until the afternoon of 24 April, not in a timely open manner for our review and comment. In the future we would appreciate “real time” notification so that we may provide meaningful comments as per your request.

Apologies that you were not aware the Plan was available for public comment. CDFW announced its availability via press release and posted it on the CDFW Deer Conservation web page. However, additional opportunities to comment are forthcoming. As the individual DCU plans are prepared, each will be open for public review and comment. A series of public meetings to discuss the DCU plans will also be scheduled.

B. In general it would seem as though the promulgation of this plan is premature as the preliminary studies needed to develop your “adaptive management objectives” have not yet been developed much less implemented.

The California Deer Conservation and Management Plan serves as a framework for the development of DCU plans. There was no intent to implement conservation actions in this framework. Area specific, on the ground actions will be guided by development of the DCU plans.

C. For the analysis to be meaningful, both summer and winter ranges for all migratory herds must be included. This plan must include a section discussing, with specificity, how these peer reviewed population estimates are going to be conducted.

Each DCU plan will have a habitat conservation section which will identify important deer areas and a population management section which will specifically identify the method(s) used to monitor populations.

D. Proposed monitoring of deer populations and evaluation of restoration efforts make no mention of methodologies that will be used and must be presented in order to be meaningful. Esoteric comments regarding monitoring are easily made but frequently impossible to implement. There should be a detailed work plan with staff levels and funding committed to developing and implementing a plan of this magnitude. A Budget Change Proposal should be included as an appendix to the plan.

Each DCU plan will include a prioritized list of tasks to be completed in order to meet population and habitat goals. A major goal we are trying to accomplish through the development of these plans is an inventory of what information we have and what information we need to collect. Once we have this information we can make informed decisions on what needs to be done and the areas where the work is needed most.

Perhaps the most important element of the DCU plans will be the habitat element. These plans will identify specific areas for specific actions; many of these can be accomplished in partnership with other land management agencies (USFS/BLM) in conjunction with non-profit organizations funded with grants through CDFW's Big Game Management Account. As such the need for more personnel and/or spending authority provided through the Budget Change Proposal process is unlikely and at this point in the DCU development process premature. In addition, Budget Change Proposals are internal documents used by the governor's administration and typically not available to the public.

E. The inference that the existing deer management units (zones) may need to be changed is not yet founded in any statistically meaningful data analysis. Before suggesting something as controversial as changing deer zone boundaries, a solid foundation must be presented to show that it will be beneficial to the resource and the public.

You are correct that there is no meaningful data to support changing the zones. Part of the DCU planning effort will be to collect biological and ecological data that will help assess whether or not the existing boundaries are warranted. In other words we plan on letting the biological data help us make these decisions. The California Deer Conservation and Management Plan is meant to be the framework for the individual DCU plans. By design, there is no data or analysis in the document. As an aside, the recent deer hunter survey conducted by Responsive Management (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=93531&inline>) indicated that the majority of hunters supported merging some zones.

F. This plan would appear, at best, to be a concept outline that needs to have substantially more public stakeholder input through many well-advertised open meetings statewide. Once the overall statewide plan outline is developed, a budget for staff and dedicated funding must be developed and no decision about boundaries of deer management or conservation units is possible until these issues are settled.

It is stated in the Plan that it is intended as a framework for the development of the DCU plans. It is also stated that public meetings will be held to discuss the DCU plans as they are developed and that collection and analysis of biological data will guide us in decisions on deciding if changes in DCU/hunt zone boundaries are warranted.

G. On a presentation level, there would appear to be a lack of completed staff work as it is painfully apparent that little or no meaningful, thorough, proof reading of this document was conducted before it was presented to the public.

CDFW apologizes for the typographical errors in the document.

5. G KENT WEBB: College of Business, San Jose State University

A. "In California, does comprise less than two percent of the total deer harvest, and the level of doe hunting in California is not substantial enough to result in a significant change in the management of desired buck:doe ratios nor is it enough to significantly modify the overall population number and relieve potential impacts to over-browsed deer range." This statement appears to be factually incorrect and misleading to the public.

The intent of this statement was to convey that in game management, using doe harvest to induce a population change typically requires manipulating large number of does to make a difference in overall population numbers. CDFW implements relatively few doe hunts. For example if over browsed range were identified, CDFW's ability to manage populations through selective harvest would be limited and might not suffice to alleviate the problem. As the comment does not specify why, how or where the statement is incorrect or misleading, it is difficult to answer.

B. The Department also needs updated information to develop annual hunt tag quotas. This includes demographic information ..." As the data in the paper indicates, California has the lowest hunter success rate in the nation, a metric used by many states to adjust deer targets. North Dakota adjust tags with a target success rate of 70 percent. Even though the California has an earlier deer season, not concentrated in the rut, it seems the state is applying very high hunting pressure to the available buck population, taking out a very large percent of the available bucks annually. The equation in Table 5 on page 18 of these comments shows that low hunter success rates are correlated with low recent harvest (2013) compared to peak harvest. The large number of buck tags issued annually by CDFW appears to be contributing to the deer population decline.

CDFW is mandated to provide a deer hunting program which results in no measureable impact to the State's deer population. Tag quotas are developed with a variety of factors in mind (for example hunter demand and hunter success are used to assist in development of X zone tag quotas) but the most important one is the population estimate which identifies the number of legal bucks in the population. This number, in conjunction with management objectives currently identified in individual herd management plans, ultimately determines the final tag quota and not a more subjective and arbitrary measure like hunter success.

C. I support an effort to push for much higher tag prices with fewer tags sold. I would be interested in learning of any efforts underway to find alternative funding sources for CDFW.

License fees are adjusted annually to account for inflation. Fish and Game Code specifies what funding sources are to be used by CDFW Big Game programs (including deer). Budget updates and other information regarding CDFW's operational capacity can be found on our home page. Contrary to your suggestion for fewer tags, our recent hunter survey (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=93531&inline>) indicated that the majority of deer hunters indicated that the opportunity to get out and hunt was the thing they valued the most.

6. ROBERT E SMITH: California Hunter

A. Not enough food... the forest is a jungle and without proper management will not sustain a large deer herd... we need to pressure the forest service to implement burns throughout the forest starting now..

Deer management basically consists of two elements – habitat management and population management. As the author correctly points out, deer habitat must be managed to continue to produce the quality and quantity of forage necessary to maintain a population at a given level. Burning is the quickest and cheapest way to accomplish this kind of habitat “enhancement” for deer; however, recent conditions and habitat management objectives favoring old-growth systems have largely prohibited the use of this management tool in California.

The Author correctly identifies that deer habitat management is a multi-entity effort. One component of the plan is outreach. Each DCU plan will have an outreach component. Land management agencies with management authority over deer habitat within the DCU will be critical elements of the plans success and will be consulted with extensively throughout the development of the DCU plan.

B. To many predators... we need to rethink the moratorium on hunting bears with dogs, and allow the houndsmen to resume the taking of bears using their dogs.. this will decrease bear numbers and increase fawn survival rates.. if animal rights groups argue about cruelty remind them of the cruelty when a bear rips a fawn away from the doe giving birth, and maybe killing the doe as well!!!

DCU plans will address non-hunting related mortality. Non-hunting mortality includes mortality associated with predation and will be an important factor to consider as population goals are developed. The decision to ban the use of hounds for bear hunting was done through the Legislative process (SB 1221, 2011-2012 Legislative session) and was signed into law (FGC 3960) by the Governor in September, 2012. That prohibition can only be lifted through the legislative process and not by CDFW or the FGC.

C. Same as # 2 above only applies to mountain lions.. they have no natural enemies and having been undisturbed for years have grown in numbers... negatively impacting the deer herds as their primary food source.

CDFW is implementing (and planning on implementing) additional studies on predation, including that done by mountain lions. As previously mentioned, non-hunting related mortality will be an important factor to consider as population goals are developed through the DCU process. The ban on hunting mountain lions was voted on and approved by the majority of California voters (Prop. 117) in 1990; this law can't be changed by CDFW or the FGC.

D. Reduce deer tag numbers.. after the other three suggestions have been implemented look at reducing tag numbers, or have a hunter decide if they want to hunt archery or rifle, one or the other, not both!

CDFW is implementing (or planning) additional studies that will help us assess population numbers and trends. This information combined with other demographic data will help us refine tag quotas. Changes in current management objectives (and associated hunter opportunities) will be developed as the DCU plans are completed. As we already indicated our hunter survey showed that the majority of deer hunters want the Department to provide them with the opportunity to hunt deer.

E. Do not hamper people shooting non-game species like coyotes... there is no danger of over hunting ... they are many, and unlike bears and lions can be successfully called into rifle or bow range.. I know recently there has been talk of making coyotes a game species or regulate their take... this is the wrong way to go for a non-existing problem put forth by the same people that want to ban all hunting!!

This is a deer conservation plan and, as such, will discuss factors which impact deer populations (both positively and negatively). Predation is one of those factors. However, this plan will not dictate management of other species or the hunting programs associated with them. Additionally, the Author should be reminded that actions taken by the FGC are often initiated by the public and are not solely done by CDFW recommendation.

7. MATT de Clercq: California Hunter

A. If predators, specifically Mountain lions remain inaccessible to management practices, you are wasting your time and my money.

The ban on mountain lion hunting was voted on and approved by the majority of California voters (Proposition 117) in 1990. It is incorrect to assert that simply because one factor in th management equation can't be manipulated then it should not be attempted. Predation is one factor that is going to continue to be difficult to mitigate for in California through the take of more predators; however habitat manipulation can

result in population increases in target species and that is an important element of this Plan.

8. ROBERT ANDERSON: Apple Valley, CA

A. I was very happy to see the consideration of increased doe management hunts included in this plan. Now if we can address the Mountain lion population in the near future we might be able to grow the deer population! A good plan, thanks for all the work you do.

CDFW would/does recommend doe hunts where data supports they are warranted; however those decisions are largely in the hands of the Boards of Supervisors in the counties in which they are proposed (many of the antlerless hunts CDFW currently implements are in "non-veto" counties). The intent of the Plan is to collect better data that will support conservation and management decisions including doe hunting. The ban on mountain lion hunting was voted on and approved by the majority of California voters (Prop. 117) in 1990, and it would require a similar effort in order for CDFW to again manage mountain lion populations through hunting. Thank you for the kind words regarding the plan.

9. TYLER HARRIS: Anderson, CA

A. Im sure at one point these DCU's will become no hunt zones. If you as a public service agency have the conservationists and the resource as priority and not the anti's then you should implement a predator control method with a deer management plan that includes doe control. implement predator control! This does not mean to go from one extreme to another(no hunting to massive kill numbers) this means to also manage predators.

The intent of the DCU's is to conserve deer for their use and enjoyment by the people of the state. This includes deer hunters. The Deer Program strives to provide a variety of deer hunting opportunities. Each DCU plan will contain objectives to assess the impact predators may have on deer populations. As is true for any conservation or management action, the issue must first be identified before conservation recommendations can be made and an appropriate course of action taken. Through development and implementation of the DCU plans it is anticipated that the information we gather through assessment of non-hunting mortality will lead to informed conservation and management decisions.

10. Sophia Runne: California Forestry Association

A. DFW could enter into a MOU with USFS to improve deer habitat.

CDFW and the USFS have a long history in the management of wildlife habitat in California. USFS staff have expressed interest in participating in the development of DCU Plans and the specific deer conservation actions they will ultimately identify.

Because CDFW has control of only 1% of deer habitat in the state, we have in the past and will continue to welcome the USFS and BLM as partners in deer conservation and management efforts. As part of DCU outreach we will discuss deer conservation and management with the federal land management agencies and reach consensus on activities which aid deer conservation and result in sustainable deer populations.

B. DFW should avoid any plans, direction or regulation that promotes static habitat management.

Comment noted; that is a key element of adaptive management.

C. DFW should promote a regulatory environment that provides for the ability of a private landowner to actively manage their productive forest lands.

Comment noted.

11. BILL MAGLADRY: Financial Advisor, Calaveras County Fish and Game Commission

A. I see no mention to the impact that predators are having on the deer population in California.

Please see Goal 4 (Monitoring, Applied Research and Adaptive Management) of the Plan for a discussion on predator impacts. The DCU plans will assess non-hunting related mortality and quantify, to the best of our ability, the magnitude of predator impacts on deer populations. Once the impacts have been identified and quantified, the appropriate conservation/management recommendations can be made.

B. Let the public know of the serious impact that reduced hunting of bears and mountain lions is having on the deer population in California

The DCU plans will assess non-hunting related mortality and quantify, to the best of our ability, the magnitude of predator impacts on deer populations. Once the impacts have been identified and quantified, then appropriate conservation/management recommendations can be made. Without such data it is difficult to support the Author's contention that a lack of predator hunting is significantly impacting deer populations.

C. If it is determined, scientifically, that bears are in fact having a significant impact on the deer population, then we should consider regulations that will allow sportsmen to harvest more bears for a more balanced deer and bear population

CDFW currently evaluates non-hunting mortality in the development of tag quotas. If it is determined that reductions in bear populations can result in sustainable increases of deer populations regulatory change may indeed be proposed. However, the Author should be reminded that other factors, most likely the highly vocal segment of

California's population that does not support bear hunting in any form, will also be considered through the FGC's regulation adoption process.

12. JON HAYS: Willows, CA

A. In light of the of the impact that bear are shown to have on the deer population in the Deer Conservation Management Plan, I would purpose selling a reduced fee deer-bear combination tag in zones where bear are a problem.

There is nothing in the California Deer Conservation and Management Plan that indicates bear predation is having a significant impact on deer populations. However, each DCU plan will address non-hunting related mortality (which includes predation). Because no data currently exists which indicates a reduction in bear populations will result in a sustained increase in deer populations, it is premature to begin discussing ways to reduce the bear population in any given area of the State.

13. GARY ROTTA: Quincy, CA

A. No mention or reference to the Deer Assessment Units (DAUs) that were developed in the late 1990s by the Department. Provide a brief word about the DAU effort in this Introduction and provide a sentence as to how/why the DCU concept replaces it.

The DAU's were adopted by CDFW and Fish and Game Commission in the 2004 Environmental Document Regarding Deer Hunting as a way of collecting and analyzing deer population data. These DAU's are approximately the same and with the same intent as the DCU's. Both were/are intended to assess deer populations at the landscape level.

B. The statement "efforts to increase specific game species populations have changed and will continue to change to meet a broader ecosystem approach". This is a pretty strong open-ended statement. I think more explanation is needed as to WHO is making these efforts and HOW these efforts "will continue to change"; are these efforts internal at the Department, are they politically motivated, an environmental movement, anti-hunters, frustrated deer hunters, etc?

As with most natural resource conservation and management related actions, stakeholders play a role in the decision making process. Stakeholders can be any interested individual, group, government or non-governmental agency. In the regulatory process, after available information is considered and stakeholders voice their opinions, the decision making body with discretionary authority (within their jurisdictional power) makes the final decision.

C. So it appears the Department has played its hand in the introduction and that the Departments bottom line position is that more early seral (whatever that is, not defined in the plan) is needed to attain population goals for all DCU's. Well if this is the case, why go to all the effort and expense of creating DCU plans when the answer is already

obvious? What is needed is a quantification of habitat (including early seral?) for each DCU so that some sort of supportive case can be made that this habitat component, or some other problem (too many houses in the urban sprawl, too many roads, too much old growth conifer forest) is limiting and can be discussed in an unbiased analysis.

The California Deer Conservation and Management Plan is intended as a framework for the individual DCU plans. Area specific information will be included in these plans. Habitat is an important component of deer conservation and management. Deer need food, cover and water, so obviously habitat is important. Nowhere in the plan is it stated that more early seral is needed to attain population goals. In fact, there are no population goals included in the Plan. What is stated is that decline in habitat quality and the loss/conversion of deer habitat are the biggest stressors on deer. Changes in land management practices and loss of habitat from development have impacted deer habitat. It is also important to note that CDFW has authority to implement management actions on about 1% of deer habitat in the state and consequently is limited in the scope of management actions it can implement. However, there are certainly other factors besides habitat that impact deer populations. The DCU plans are meant to assist the Department in organizing existing data, identifying data gaps, collecting data to fill those gaps and analyzing data to assess numbers and health of deer populations. CDFW is developing area specific DCU plans. One component of these plans will be habitat conservation. Important deer areas will be identified and mapped. How and when deer are using these areas and how these areas are distributed across the landscape are some of the things we plan on assessing.

D. As for “early seral habitat”, this should be defined and discussed so that the public, as well as CDFW biologists developing the DCU plans understand what is being described.

Appropriate habitat descriptions will be provided as necessary in the DCU plans.

E. The Conservation Plans generalization that more early seral habitat is needed to attain goals needs to be filtered because not all early seral habitat is quality deer habitat.

The Plan was meant as a framework for the DCU plans. Area specific habitat descriptions and their importance to deer will be included as necessary in the DCU plans.

F. DCU Objective D2: implement activities and projects prioritized in the plan. This seems too simplistic. There is no mention about accounting for different habitat types available in each DCU, the potential carrying capacity (K) each habitat has for supporting a deer during the season, the amount of each habitat type present within DCU range, and thus the potential amount of habitat present to support X numbers of deer.

The Plan is intended as a framework for the individual DCU plans. Area specific information on habitats and populations will be included in these plans. One objective of these plans is to gather existing information and identify data gaps. Plans to fill these gaps will be developed. As plans are implemented, population demographic data and data on habitat and deer body condition will be assessed.

G. How does acquiring all this population data (abundance, survival, recruitment, non-hunting mortality (no mention of additive or compensatory) translate into habitat conservation projects? Population data collected without habitat capability information does not contribute to identifying what K habitat factor is limiting. The department has already concluded that no matter what population numbers are estimated, doing early seral restoration is needed (see page 6 of Conservation Plan). Not sure this is a relationship that can be shown (or a perceived bias that can be verified) without good habitat productivity information.

Collection of population data is meant to provide a new baseline for deer conservation and management. This is one component of deer conservation and management. CDFW will assess habitat condition as part of the Habitat Conservation component of the DCU plans. Stressors and how they act on deer populations will be assessed because it is CDFW's job to manage populations and not the habitats upon which they exist. CDFW is proposing to monitor these populations to determine the effectiveness of various habitat manipulations identified in the DCU plan, not necessarily conduct the habitat manipulations ourselves. The habitat data recommended by the Author is meaningless without the complimentary population data identified in the Plan

H. How many deer (population) can a DCU support based on habitat conditions
I would like to know what percent of all DCU plans, including the Applied Research objectives, the Monitoring Objectives, and especially the Outreach objectives, will be funded by the hunter and what percentage will the non-hunting public contribute through general funds.

Deer hunters will primarily fund development and implementation of the DCU plans through the Big Game Management Account. Fish and Game Code specifies appropriate uses for Big-Game Management Account funds and an advisory committee made up of interested non-profit organizations provides comments on projects funded through the Account. The Department will also use the Pittman-Robertson Federal Aid in Wildlife Restoration Act to fund some conservation activities.

14. MICHAEL DIER: California Hunter

A. Be considerate to the hunting culture of all social and economical classes consider offering a Doe tag as a first or second tag in areas listed as restricted or premium without the process of points and draws or waiting for leftover tags. Offer the Forest Service and other local governments funding to introduce prescribed fire into the habitat. Have DFW be an active participant in large fire suppression activities along with the B.A.E.R Team processes (Burn Area Emergency Rehabilitation

Team). Offer other government agencies funding for their "ologists" to assist in your research- think out of the fiscal box, but provide a state employed "ologist" for oversight.

CDFW strives to provide legal hunting opportunities to interested citizens. As part of DCU planning efforts we will reach out to federal land managers (i.e. USFS, BLM, various military installations) to conserve deer habitat on federal lands.

B. Function MORE up front; present your meetings live to such public media as the Outdoor and Sportsman channels, and forums such as Jesse's Hunting Outdoors; or even youtube on your state website.

DCU planning efforts will include outreach to deer hunters as well as the general public. Thank you for providing some alternatives to the normal approach of soliciting these types of comment and input.

15. JOHN DAWSON: Yreka, CA

A. Zone B-6 is to be renamed D-1. This is done to assure there is NO CONFUSION by the hunting public. A hunter must possess a valid unused D-1 Deer tag for that specific deer season in order to hunt deer in zone D-1.

B. Zone D-1 will be a ONE DEER TAG ZONE. No person shall possess more than one deer tag which would authorize the take of deer in the D-1 Deer Zone. Only one D-1 deer tag may be obtained or possessed for the license year.

C. Archers wishing to hunt deer in D-1 must obtain a separate tag AD-1 which is ONLY valid during the Archery season in Zone D-1. Only one AD-1 tag may be obtained or possessed. A person with an AD-1 deer tag may not obtain or possess a D-1 Deer tag for the use of firearms in zone D-1 during that year's season.

D. Archery deer season for zone D-1 will begin on the second Saturday of September and extend for 16 consecutive days (Sept 10, 2011 to Sept 25, 2011)

E. First Firearm Season for zone D-1 shall begin on the first Saturday of October and extend for 9 consecutive days (October 1, 2011 to October 9, 2011).

F. Second Firearm Season will begin on the third Saturday in October and extend FIVE consecutive days (October 15, 2011 to October 19, 2011). This proposal could be a Primitive Hunt for black powder enthusiasts. That would further decrease the harvest but still provide opportunity for a very high quality late season hunt. This season would occur just prior to the normal time of the rut, which typically starts in late October or early November.

G. Archery Deer Season tags for zone D-1 (AD-1 tags) shall not exceed 1,000 tags.

H. First Season Rifle Deer tags for Zone D-1 shall not exceed 3,000 tags.

I. Second Season Rifle Deer tags for Zone D-2 shall not exceed 500 tags.

J. Total Tags Issued for D-1 shall not exceed 4,500 tags.

Response to comments 15 (A-J): The individual DCU plans will include assessment of area specific information and recommendation such as these. This information will allow CDFW to determine what data exists and what data we need to collect. This information will assist us with refining deer hunting regulations. The Plan is not designed to solicit area specific comments regarding hunting or public use; the Plan is designed to provide an umbrella under which structurally comparable management plans (the DCU plans) will be developed and which may contain specific action items such as proposed by the Author.

16. DAVE SMITH: Missoula, MT

A. Comment: The Wildlife Habitat Incentives Program was eliminated in the 2014 Farm Bill through consolidation with the Environmental Quality Incentives Program (EQIP). However, 5% of the EQIP funds are set aside for wildlife habitat conservation so as not to compromise the legislative intent of WHIP. In addition, the 2014 Farm Bill includes a large-scale conservation easement program – the Agricultural Conservation Easement Program – that can help achieve mule deer land protection objectives. As such, I'd reword that sentence as: Other incentive programs include the California Wildlife Conservation Board's (WCB) habitat restoration programs for riparian, rangeland, grazing land, grassland, oak woodlands, and forest habitats. The federal Farm Bill has a large-scale conservation easement land protection program, the Agricultural Conservation Easement Program, as well as restoration and land improvement programs, such as the Environmental Quality Incentives Program.

Comment noted. Thank you for the information.

B. I'm aware of some significant mule deer habitat work being implemented through EQIP via juniper removal in Lassen and Modoc County and improved grazing management in the Central Valley foothills. As such, I think it is good to highlight the potential for EQIP (as well as the Easement Program) in your Habitat Conservation Objectives section. These programs are both delivered by the USDA Natural Resources Conservation Service.

CDFW has previously awarded grants for juniper removal in Modoc County through the Big Game Management Account grant process. Thank you for the information on EQIP.

17. BOB von BUELOW: Apple Valley, CA

A. I would like to see more specifics in the next draft of the plan. It is difficult to see if there is a 'hidden agenda' of reducing hunt quotas for reasons other than improving deer management. It is not hard to see that anti-gun movements in California (and

elsewhere to be sure) would be only too happy to eliminate hunting and thereby hoping to reduce gun ownership. You need to be very clear where this plan stands on this issue. For example, a statement early in the document that a long term goal of increasing deer hunting opportunities through better management would go a long way toward believability. I can't stress this last point enough.

As the state's trustee agency for wildlife two of CDFW's mandates (applicable directly to deer hunting) are 1) to provide for the beneficial use and enjoyment of wildlife by all citizens of the state and 2) to maintain diversified recreational uses of wildlife, including the sport of hunting, as proper uses of designated species of wildlife. In addition, it is the policy of the Legislature that conservation, restoration, maintenance and utilization of California's wild deer population be encouraged. Deer hunters, as citizens of the state, are entitled to the beneficial use, utilization and enjoyment of wildlife (including deer and deer hunting). Uses of deer (and other wildlife) are specified in Fish and Game Code and assurances that CDFW will abide by applicable policies, laws and regulations are not needed. In addition, part of what we are required to do is maintain diversified recreational uses of wildlife (deer are wildlife) including the sport of hunting. CDFW will continue to provide deer hunting opportunities with conservation of deer as its primary objective.

18. Scott McMorrow: Inverness, CA

A. I'm requesting that the Department add language to the draft CDCMP that further supports the use of hunting as a management tool. should include the following, or similar, statement: The Department recognizes that managed hunting is a healthy and valuable tool used for deer management. Hunters fund nearly all deer management activities through their purchase of hunting licenses and deer tags.

Please see response to 17 (A), above. It is true that deer hunters fund nearly all deer management activities through their purchase of hunting licenses and deer tags. Through development and implementation of the DCU plans, CDFW hopes to continue providing deer hunting opportunities for future generations.

19. BRAD FRANCIS: Mount Shasta, CA

A. BTW they got some very nice bucks out of the North Slope of Mt Shasta where I put in about 50 guzzlers of the fiberglass types, one was a DFG cooperative thing, and huge. Most were the little 500 gallon type, because I soon learned the locals would set up blinds and shoot deer off the big guzzlers with considerable success. They could not keep track of the small ones and so I put in mostly those in later years. These need maintenance and it appears the local USFS biologist is NOT doing a thing for them. Can you get someone to maintain these guzzlers? Can I discuss this with some local CDFW guys?

CDFW awarded the California Deer Association two grants totaling \$400,000.00 to conduct an inventory of guzzlers in the Northern Region which includes the Mount

Shasta area. Funds from these grants will also be used to repair/replace non-functional guzzlers. You can contact the R1 general information line to be directed to the area's Unit Manager for more discussion regarding guzzler maintenance and installation of new guzzlers.

20. ALAN NUNES: Granite Construction Inc.

A. The deer population has taken a drastic down turn over the past 10 years. Your biggest issue is predators particularly Mountain lions. These animals are completely out of control. They are eating everything they can catch. They are a killing machine. It is funny how you people can turn a blind eye at such an epidemic. No one wants to admit to the issue. This issue is going to get a whole lot worse.

The voters of California banned mountain lion hunting (Prop. 117) in 1990 which is why they have the status they do today. CDFW does not manage mountain lions through hunting and will not do so unless a similar effort overturns the 1990 decision. The DCU plans will assess non-hunting related mortality which includes predation in order to recommend biologically sound public use programs. We are not casting a "blind eye" to predation but need information collected through the scientific process to determine if a problem exists, and if so, the magnitude of that problem. That notwithstanding, there is currently no mechanism to control mountain lion predation on deer or other wildlife.

21. STACIA TOW: Garden, CA

A. My husbands loves to go out and hunt deer. I hope he continues to have affordable access to his favorite pastime.

CDFW strives to provide legal hunting opportunities for the people of California. Through development and implementation of the DCU plans we hope to continue providing these opportunities.

22. MICHAEL GRIGORIEV: Los Angelas, CA

A. I have picked up interest in deer hunting three years ago and have been enjoying it ever since. I have yet to harvest a deer but that is part of hunting. I hope to continue to have easy access to hunting grounds that exists today and pass that on to my kids.

CDFW is pleased to provide these opportunities. Through development and implementation of the DCU plans we hope to be able to continue providing them to future generations.

23. DAVID GRADSTEIN: Hemet, CA

A. I would like to suggest adding some type of predatory animal management plan that would include a survey of Lions in this state. California Lions are a controversial topic that has too many political roots that nobody wants to touch. Lion protection needs to be

revisited. Population data is almost 40 years old. A lion management plan should coincide with a deer management plan. Habitat for both, deer species and Lions, is shrinking and trying to manage deer without managing Lions is absurd. I would be interested in the thoughts of the CDFW Scientists on the impact that Lions have on CA deer populations.

CDFW is working on assessing mountain lion populations but not solely limited to their impact on deer populations. In addition to the aforementioned assessment, each DCU plan will address area specific non-hunting mortality.

24. REGINALD BARRETT: Emeritus Professor of Wildlife Management, UC Berkeley

A. I am glad to see this effort to revisit deer management in California. The draft plan is a good step in the right direction and I support all the elements proposed in the new plan. If there is any way I can volunteer to help further the efforts proposed for the future please let me know.

Thank you for your offer. Assistance from someone with your credentials would be welcome and go a long way towards establishing the biological credibility of this document and associated DCU plans.

25. JEFF ERVIN: Elk Mountain Gear, Round Mountain, CA

A. In reading over the deer management Plan, it seems you are turning a blind eye to predator control as a factor in mortality. The population curves were all taken after the moratorium on cougars was implemented, and I believe growing black bear populations are a significant factor in fawn mortality.

I believe antler point restrictions are another significant way to increase populations and certainly buck to doe ratios. This would especially be helpful for the struggling mule deer herds, and was used years ago to help maintain healthy populations with great success. I think the first step in management is to get control back into the hands of the DFG (yes I'm using the "old" name)...and away from liberal-heavy organizations (USFW) and politically driven agendas fueled by emotional campaigns. But, it is doubtful we will see much of that in the presence of the current Administration.

Each DCU plan will assess non-hunting related mortality which includes mortality associated with predation. Monitoring and applied research implemented through the DCU plans will help us in make informed conservation and management decisions. See also response to comment # 20.

26. MARK CLIFFORD: Mount Shasta, CA

A. 1. Doe harvest opportunities; 2. One buck per year per hunter (second doe tag?); 3. 3 point or better in premium areas...or all areas; 4. Habitat improvement; 5. Urban hunts (archery or shotgun or youth or youth with adult etc.); 6. Archery qualifier

class/designation (I know funding is an issue and volunteers are hard to get all the time, but archery (and rifle) hunters should be ethical and skilled...or no tag); 7. Keep up the wardens and CAPTIP/anti-poaching efforts; 8. If you offer doe hunts....nearly every tag will be filled....so it would be a big harvest.

Development and implementation of the DCU plans will allow collection and assessment of area specific information. As this information is collected and data gaps are filled, CDFW will make informed conservation and management decisions. This document was not intended to solicit regulatory changes specific to deer hunting or hunting in general, but rather to provide an umbrella document under which DCU plans would be developed to provide specific information regarding public use (including hunting) programs and habitat protection/enhancement activities specific to that DCU.

27. Ric Costales: Siskiyou County Natural Resource Policy Specialist

A. The Plan fails to address the significant impacts which could result to Siskiyou County from its implementation.

With respect to the Plan's significant impact to Siskiyou County, you did not identify any specific action(s) to validate the assertion that the Plan would have a significant impact on Siskiyou County. Because the Plan is a framework for developing and implementing the area specific Deer Conservation Unit (DCU) plans, and no implementing activities are proposed, it is unclear what potential impacts to the physical environment could be potentially significant.

B. The Plan should include local efforts such as those contained in the Siskiyou County Deer Plan.

A significant component of this plan is public participation in the development of the DCU plans. The Department is committed to engaging interested members of the public regarding their ideas about deer management, and will be conducting public meetings and will accept written comments throughout the DCU development process.

C. Encourages "substantive experimentation" based on the realities of predator management, even if perhaps "outside existing laws and policy" regarding the management of these resources.

As the state's trustee agency for wildlife conservation, the Department's actions are dictated by laws and regulations. Some of the laws and regulations the Department is required to enforce may not be popular with every member of the public (including hunters). As employees (and citizens) of the State we are bound to respect existing laws and regulations with respect to our jobs and cannot ignore those we may not agree with.

With respect to mountain lions, a ban on hunting mountain lions was enacted after a majority vote by the state's voting public. The ban was chaptered through the state's

legislative process, and it would take a similar legislative process for the law to be changed. The Department is unaware of any efforts to repeal the law.

We recognize that predators are part of a functioning ecosystem and that deer are prey for some predators. Information on non-hunting related mortality (including predation) is necessary for conservation and management, and the Department is planning some area specific predation studies as part of DCU planning efforts. One of the most important goals of DCU planning, is to collect good biological/ecological data and let that data guide conservation and management recommendations. We hear opinions on a variety of subjects including predator density and their impacts on deer populations. While we respect these opinions, the Department would not be able to use unsubstantiated information to support management recommendations. To support management recommendations, the Department needs data (collected and analyzed through the scientific process) on non-hunting mortality, including the potential impact predators have on deer populations.

28. John L. Gray: Chairman, Tuolumne County Board of Supervisors

A. Tuolumne County concurs with the use of DCUs for big picture analysis and to develop overarching management objectives; however, deer populations need to be managed in a more localized effort.

CDFW is proposing to conserve and manage California's deer at the landscape level (or Deer Conservation Unit). This means collecting comparable, meaningful data on deer populations across the landscape. This also means letting the biology of deer and the ecological processes acting on deer in a given Deer Conservation Unit (DCU) drive the conservation and management actions in that DCU. The DCU plans will identify where more information is needed or where different methods can be used to estimate populations depending on more "local" conditions.

B. Deer herd plans should be the primary tool for managing deer on a local basis. Resident animals should be managed differently than migratory deer.

Each of the DCU's will have a separate management plan and there will be opportunities for stakeholders to review and comment on each DCU plan. The proposed DCU's are meant to serve as a starting point for developing the individual plans and it is likely that the number and/or boundaries for these proposed DCU's will change during DCU plan development and implementation. Management strategies will be developed as part of the DCU process.

C. There is a need for a comprehensive evaluation of legislative efforts and initiatives that are in place within California to protect predators and how they relate to the deer population.

All forms of non-hunting mortality (including predation) will be evaluated and considered as part of the Population Management element of the DCU plan. While there may not

be much the Department can do about it (for example, Prop. 117 was a voter initiated effort), predator impacts play an important role in deer population management and they cannot be ignored in the development of realistic population goals.

29. Roman Porter: CEO, California Deer Association

A. It seems evident that the decision to move away from current deer conservation and management techniques, and adopting a “landscape level” management approach is a foregone conclusion within the Department.

The Department is committed to conserving deer and providing deer hunting opportunities for interested citizens now and in the future. For the Department to conserve the state’s deer for use and enjoyment by the people of California (this includes hunting), we need to go back and look at some of the management methods used in the past and assess how well they worked. New science and technology is allowing us to use methods to estimate populations on a scale that was not possible as recently as ten years ago. These new methods will allow us to assess populations and habitats at a landscape level and with a greater degree of confidence in the statistical analysis.

B. Taken in concert and in context with the monumental changes suggested by this Plan, the structure and comments within the plan seem to obviate any concept of the public plan being able to influence the direction of this Plan.

This plan is a realistic assessment of the future direction of deer management in California prepared by Department employees hired to manage this resource in the public interest. It is a framework by which the DCU plans will be developed employing a public and transparent process to identify conservation strategies, data collection and analysis protocols, and habitat improvement projects to benefit to conserve deer populations.

C. Goal 1 – This landscape level approach focuses on larger swaths of land, but there is limited information on why this is preferable to the current method using deer boundaries. Further discussion and explanation is needed to articulate the benefits of this change.

Please see page 2 of the plan for more information on this subject and response to comment # 2.B.

D. A key concern is that increasing zone sizes would potentially provide opportunities for hunters to concentrate their efforts in a specific area, potentially disproportionately impacting a single deer herd.

The DCU concept will provide a framework for management strategies, data collection and analysis based on those management strategies, and direct habitat management activities which benefit the deer population. At this point it is premature to state the

Department is “lumping” zones; if a change in conservation/management strategy, enforcement issues, and/or data analysis indicate zones may need to be adjusted those proposals will be reviewed and adopted by the Fish and Game Commission through their normal regulatory process.