



April 7, 2008

Mr. Keith Charters, Chair
Natural Resources Commission
P.O. Box 30028
Lansing, Michigan 48909

Mr. John Madigan, Chair
NRC Wildlife Committee

Dear Chairmen Charters and Madigan:

On behalf of the Michigan State Chapter of the Quality Deer Management Association (QDMA) we are writing to provide input on the Natural Resources Commission's (NRC) antler restriction guidelines. The QDMA is an international nonprofit wildlife conservation organization dedicated to ethical hunting, sound deer management and preservation of the deer-hunting heritage. The QDMA has over 50,000 members nationwide with Michigan ranking fourth in statewide membership. Our membership includes more than 2,500 of the nation's leading wildlife and forestry professionals. As such, QDMA is widely regarded as the most respected whitetail organization in the United States.

We are writing today on behalf of the 4,300 Michigan residents who are QDMA members and active in our state of Michigan QDMA organizations. The NRC has a program for sponsoring outdoor organizations like ours to propose and help administer antler restriction experimental programs. For the past three years, there has been an NRC imposed moratorium on these programs. This moratorium expires this month and we believe a number of outdoor groups will propose antler restriction programs in the near future.

Before the NRC accepts new applications for antler restriction programs, we believe the NRC should review its 1999 *Procedure for Initiation, Evaluation, and Review of Quality Deer Management Proposals* to determine if they need updating to reflect Michigan's experience with the guidelines. Our members have been active in managing almost all of the antler restriction proposals started under the mandatory guidelines and, as a result, we have extensive experience with the guidelines since the beginning. We have two suggestions for improving the guidelines:

- 1. Handling of "No Opinion" Responses.** For determining overall support for an antler restriction proposal, the Department of Natural Resources (DNR) staff has survey respondents indicate support or non-support for the proposal by responding one of four ways: "Yes", "No", "Don't Care" or "No Opinion." In gauging total support for the proposal, the DNR staff includes the "No Opinion" responses in the total number of responses. We believe it would be better public policy to count only the survey results of people expressing an opinion on the proposal. The current tabulation process for surveys effectively results in "No Opinion" responses counted as "No" responses because they are included in the total number of opinions and the "Yes" responses are calculated as a percentage of the total responses, including "No Opinion" responses. Those not expressing

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an opinion should not count as “No” responses for the purposes of determining support. In short, you should treat “No Opinion” responses just as you do “Don’t Care” responses (ignoring both of them) since there is little distinction between these two non-responsive replies. In the recent Leelanau County survey results, there was a “No Opinion” response rate of almost 8%. Counting this large of a non-response as a “No” response is blatantly unfair, has no scientific basis, and puts an enormous burden on the sponsoring party.

- 2. The 66% Clear Majority Standard.** We believe you should reduce the standard that requires sponsoring groups achieve a 66% approval satisfaction rating before the NRC would authorize an antler restriction experiment. We believe getting the public to agree by more than a 2:1 margin on almost any wildlife issue is an extremely high standard to meet and is unnecessarily excessive to demonstrate acceptance of the proposal.

Given that antler restrictions are a widely accepted deer management practice, we believe that user support for an antler restriction proposal of less than 66% support should be adequate to ensure that a “clear majority” supports the program.

Thank you again for your consideration of our ideas for better deer management. The QDMA and our local members stand ready to assist you in any way possible as you deliberate these important issues.

Respectfully,

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cc: NRC Commissioners
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