



NATIONAL DEER ASSOCIATION

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Maine Department of Inland Fisheries & Wildlife
C/O Becky Orff
41 State House Station
353 Water Street
Augusta, ME 04333

28 April, 2022

RE: Comments on Proposed Changes to Chapter 16 Rules Regarding the Antlerless Deer Permit System

Dear Maine Department of Inland Fisheries & Wildlife:

On behalf of the National Deer Association (NDA), I am writing to provide our comments in support of the Maine Department of Inland Fisheries & Wildlife's (IFW) proposed changes to Chapter 16 rules which will affect the antlerless deer permit system. We are a national non-profit conservation organization with the mission to ensure the future of wild deer, wildlife habitat and hunting. We represent 30,000 members nationwide, including hunters, landowners and natural resource professionals.

The NDA supported the recent law changes from the 2nd regular session of the 130th Maine Legislature, and we also support IFW's proposed rules that will work in conjunction with the legislation to change any-deer permits to antlerless deer permits. This change will allow Maine hunters who obtain (via lottery or over-the-counter) a permit to harvest both an antlered and antlerless deer – a major change from the either/or system currently in place. Additionally, revenues generated by fees created with the new antlerless permit system would fund the Deer Management Fund with the purpose to purchase and manage deer wintering areas in western, northern and eastern Maine.

The harvest of antlerless deer is incredibly important on multiple fronts, including herd, habitat, hunter and disease management. Deer densities have soared in the southern part of the state, significantly and negatively impacting habitat. Even more, portions of the state with the highest deer densities have the highest national incidence of Lyme disease – a bacterial infection transmitted by the bite of deer ticks. Only once in the last decade have antlerless harvests met IFW's goal, and recent years have seen antlerless harvests missing the mark by around 30%. The current any-deer permit system is also under-utilized – only about 50% of Maine hunters enter the lottery, and recent increases to permit quotas did not boost participation or antlerless harvest.

Meanwhile, other parts of the state have seen declines in deer populations. Parts of northern Maine have seen declining populations over the last two decades, in part due to poor wintering habitat. Fees generated from the new antlerless permit system will ensure that the Deer Management Fund can be effective at purchasing and managing critical wintering habitat in parts of the state where herds are struggling.

Undoubtedly, the deer hunting tradition and industry in Maine has deep and widespread roots, and ensuring herds are managed as close to objectives as possible is critical for continued participation. Harvesting more antlerless deer and providing necessary habitat are huge strides in the right direction. Please don't hesitate to reach out with questions or for more information.

Sincerely,

Torin Miller
Director of Policy