



OFFICE OF
EXECUTIVE DIRECTOR
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COMMONWEALTH OF PENNSYLVANIA
Pennsylvania Game Commission

2001 ELMERTON AVENUE
HARRISBURG, PA 17110-9797

*"To manage all wild birds, mammals and their habitats
for current and future generations."*

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February 5, 2016

Keith McGill, Municipal Manager
Municipality of Mt. Lebanon
710 Washington Road
Pittsburgh, PA 15228

Dear Mr. McGill

In consideration of your proposal for a deer sterilization research study, the Bureau of Wildlife Management consulted the Commission's legal, policy, permitting, law enforcement and biological staff.

As a result, the Pennsylvania Game Commission (PGC) has determined that it will not support permitting of a deer sterilization research study in Mt. Lebanon.

The Commission's understanding of the facts are as follows:

- A. Mt. Lebanon's stated goal is "to reduce deer vehicle collisions with the Township by 50% over a three to five year period," (pg.5, Mt. Lebanon Deer Mgt. Plan).
- B. Deer must die (be removed from the population) for numbers and for deer vehicle collisions to decrease towards the goal.
- C. Title 34, Section 103 entitled Ownership, jurisdiction and control of game or wildlife, subsection (b) states: *Methods of management.—The commission shall utilize hunting and trapping as methods of effecting necessary management of game, furbearer and wildlife populations.*

This section mandates that the Commission use hunting as the primary method of management, thus the reason that the Commission includes a provision in Deer Control-Political Subdivision Permits that mandates that they keep some sort of hunting program. Additionally the regulations for this permit, specifically Title 58, Section 147.322 (c) mandate that:

Public land within the proposed boundaries shall be open to lawful public hunting unless otherwise prohibited under this title or as otherwise authorized by the Director. Private land within the proposed boundaries may be closed to public hunting at the landowner's discretion. However, if closed, deer control activities may not occur thereon.

- D. It is our understanding that >100 deer were taken via legal hunting by archers during 2015 in Mt. Lebanon.
- E. PGC has also issued a permit to Mt. Lebanon authorizing removal of an additional 150 deer via sharpshooting during the 2015-16 season.
- F. According to the Mt. Lebanon Deer Mgt. Plan (pg.3, paragraph 2) "there appeared to be a reduction in the number of roadkilled deer" following removal of 146 deer in the 2007-08 season.
- G. Based on D, E and F above, the remedy to Mt. Lebanon's deer problem is already being implemented.
- H. Dr. DeNicola believes that nearly all deer in Mt. Lebanon can be trapped (>95%, pg. 2 of proposal).
- I. The objective of sterilization is to reduce reproduction. Given that deer can live 15 years, sterilization provides no immediate reduction/control over deer numbers. (Hence, sterilization provides no direct route towards the goal of reducing deer vehicle collisions by 50 %.)
- J. Dr. DeNicola has suggested that 30-40% of deer mortality occurring during the study may be expected to occur via deer-vehicle collisions as per studies elsewhere. Deer vehicle collision is not an acceptable or humane method of population reduction/control.
- K. The fact that deer can be captured and euthanized, but instead are proposed to be released back onto the high road density, city landscape for an experiment expecting many will be involved in deer vehicle collisions is not responsible considering citizens who will sustain property damage and possibly physical harm.
- L. If nearly all deer can be trapped for purposes of sterilization according to Dr. DeNicola then it follows that nearly all deer can be trapped and humanely euthanized. This is another direct route towards the stated goal.

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- M. Euthanized deer will not reproduce – just as sterilized deer will not reproduce. Euthanized deer will immediately reduce deer numbers and proceed towards goal --- sterilization will not initially reduce deer numbers. Euthanized deer will not continue to pose deer vehicle collision risk --- while sterilized deer will continue to pose risks to motorists until they die.
- N. Entrapment of deer is a traumatic experience for deer even when quickly released. Some deer die from stress caused by capture and handling.
- O. We cannot approve traumatizing deer for purposes of a study or other activity that does not directly address the stated problem.

If I can provide you any further information, please to not hesitate to contact me at any time.

Sincerely,



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