



March 9, 2016

Bryan J. Burhans
Commonwealth of Pennsylvania
Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

RE: Deer Sterilization Research Study

Dear Mr. Burhans,

Mt. Lebanon Municipality would like to formally request that the Pennsylvania Game Commission follow an adaptive management approach and establish a policy to allow the use of baiting in conjunction with a locally authorized controlled hunt utilizing archery for the management of white-tailed deer. We would like to further request that the Pennsylvania Game Commission establish a policy and provide guidelines and a format to approve a deer sterilization research project with the clear and measurable goal of providing communities in Pennsylvania with a non-lethal deer management tool to maintain an existing deer population at a level acceptable to the community.

The Mt. Lebanon Commission would like to express disappointment with the Pennsylvania Game Commission's lack of support for a deer sterilization research study in Mt. Lebanon. In addition, the municipality would like to formally request that the PGC provide guidelines and a format to submit a proposal for a sterilization research project as was agreed to at the meeting held in Harrisburg on November 10, 2015.

The PGC publication "Management and Biology of White-Tailed Deer in Pennsylvania 2009-2018" (Executive Summary pgs. #iii and iv), states that "The Game Commission follows an adaptive management approach to deer management. Adaptive management is characterized by establishing clear and measurable objectives, implementing management actions, monitoring those management actions and whether they achieved the objectives, and adapting policy and management actions as necessary. Adaptive management recognizes deer management decisions must be made without the luxury of perfect information. Consequently, the focus of adaptive management is on monitoring responses to management actions and learning. By managing white-tailed deer in this way, the Game Commission can effectively adapt management as conditions change."



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Conditions have definitely changed in Mt. Lebanon and surrounding communities. The municipality has seen deer/vehicular collisions increase from 44 in 2013 to 73 in 2015. One of the goals contained in the PGC publication is to Manage Deer-Human Conflict at Safe and Acceptable Levels. (Executive Summary pg. viii). Objective 2.4, Strategy 2.4.5 is to investigate deer management tools via scientific literature and field study by 2012. Strategy 2.4.7 is to identify approved management options that reduce deer impacts by 2014. Strategy 2.4.11 is to conduct research to test and evaluate current and potential management tools as needed. The municipality believes a deer sterilization research project would fit under these objectives and strategies.

As you further indicate on pg. 83 “Deer-human conflicts are not new.” I would further offer that they are also not unique to Mt. Lebanon or Pennsylvania. As you cite in your denial letter, Title 34, Section 103 states that the Commission shall utilize hunting and trapping as methods of effective necessary management of game, furbearer and wildlife populations. The municipality recently concluded a controlled hunt archery program utilizing both public and private land in which 104 deer were removed. In addition, the municipality applied for and received a Special Use Permit #36657 to remove up to an additional 150 deer through the use of sharpshooting. The municipality has demonstrated a willingness to utilize the current tools provided by the Game Commission to reduce our deer population to what has been identified for our community as an acceptable level to achieve the municipality’s stated goal to reduce deer vehicular collisions by 50% over a three to five-year period. Sterilization could provide another tool to Mt. Lebanon and other communities in Pennsylvania to at the very least maintain an acceptable population level and manage deer-human conflicts at an acceptable level.

Page 84 of the PGC publication acknowledges that hunting “...may be limited in some developed areas because of real or perceived safety concerns, social values, and legal constraints. Some non-traditional management approaches may be necessary to address deer problems.” The municipality is already utilizing the two examples of nontraditional deer management identified, controlled hunts and sharpshooting. A deer sterilization research project or baiting as part of a locally authorized controlled archery hunt would simply be another form of nontraditional deer management for developed areas where other methods may not be possible. If not as a deer reduction tool, at the very least as a tool to maintain a deer population at an acceptable level once a community’s stated goal has been reached.



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Respectfully,

Keith A. McGill
Municipal Manager

Kelly Fraasch President
Commissioner, Ward 5

David Brumfield, Vice President
Commissioner, Ward 4

John Bendel,
Commissioner, Ward 1

Stephen McLean
Commissioner, Ward 3

Steven Silverman
Commissioner, Ward 2

cc: Supporting communiites
State Senator Reschenthaler and Representative Miller