



THE WILDLIFE SOCIETY

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April 5, 2013

Commissioners

Florida Fish and Wildlife Conservation Commission

Farris Bryant Building

620 South Meridian Street

Tallahassee, FL 32399-1600

Dear Commissioners:

The Wildlife Society is writing today regarding the proposed private land deer management program currently under consideration by the Florida Fish and Wildlife Conservation Commission (FWCC). The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of nearly 11,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and its habitats worldwide. The Florida Chapter of The Wildlife Society, a network of approximately 250 wildlife professionals working to manage and conserve wildlife in the state of Florida, recently contacted you about this proposal, and we share their concerns. We do appreciate Executive Director Nick Wiley's 27 March response to the Chapter's concerns.

The Wildlife Society strongly supports the North American Model of Wildlife Conservation, especially its core tenet, the Public Trust Doctrine. Under this doctrine, wildlife is a public resource, owned by no individual or group, and is held in trust by the government for the benefit of present and future generations. While we support efforts to make wildlife management and conservation more effective and to engage landowners, we do have concerns about the possible effects of the proposal for a Private Lands Deer Management Program on the Public Trust Doctrine.

The current national trend toward privatization and commercialization of wildlife challenges the notion of trust species held by government agencies for the public benefit. While some jurisdictions do allow limited privatization/commercialization, it must be highly regulated so as not to threaten the Public Trust Doctrine and the North American Model of Wildlife Conservation. It is in this light we ask you to consider the following concerns.

The draft proposal indicates that there would not be a fee for landowner participation. While we understand from Executive Director Wiley's letter that program participants do bear costs under the program (for the management plan and monitoring, for example), we still have concerns about the burden of administrative costs of the program falling on the public. An application fee

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or other mechanism should be developed so that program participants, and not the general public, are paying for the costs associated with management plan review and approval, data collection and analysis, and other associated costs.

We thank Executive Director Wiley for clarifying in his letter that this program was not intended for private lands with high fences, and encourage inclusion of language that makes such properties clearly ineligible for the program. The Wildlife Society is concerned about the confinement of ungulates behind high fences, and we stress that such confinement of deer has been scientifically documented to be detrimental to the captive deer and wild animals in surrounding areas. Landowners treating deer as livestock should not be eligible for relaxed hunting regulations.

Finally, we are concerned about the speed at which the FWCC is moving towards finalizing this program, which would alter the way in which wildlife on private lands is managed in Florida. While we understand and appreciate that there are wildlife management and conservation benefits to be gained by implementing the program, the current time table does not allow enough time for full and careful review by the public and by wildlife professionals.

According to FWCC, the program could offer the benefit of providing data on deer populations using private lands. We understand that this information has the potential to improve deer management and conservation in Florida. However, there may be other ways to gain this information without the concurrent effects on the Public Trust Doctrine.

We do appreciate the recognition by the FWCC of the value of certification through your requirement that landowners' management plans be approved by a Certified Wildlife Biologist, and believe this will strengthen the program.

Thank you for considering the views of wildlife professionals. If you have any questions, please contact Laura Bies, Director of Government Affairs (laura@wildlife.org).

Sincerely,



Winifred B. Kessler
President

Cc: Nick Wiley, Executive Director, Florida Fish and Wildlife Conservation Commission