



HANOVER CONSERVANCY

Protecting land & water in our community

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Mark Ellingwood, Chief
Wildlife Division
NH Fish & Game Department
11 Hazen Drive
Concord, NH 03301

March 5, 2015

RE: Draft Game Management Plan

Dear Mr. Ellingwood,

The Hanover Conservancy appreciates the opportunity to comment on the draft Game Management Plan for New Hampshire for 2016-2025, specifically as it applies to deer, moose, and bear. The Hanover Conservancy, New Hampshire's oldest local land trust, owns and/or manages some 440 acres of land in Hanover, including prime bear and deer habitat, some of it within walking distance of the downtown area.

DEER

We are disappointed by the draft plan for deer management in our area, WMU G1. While the plan correctly notes that "deer numbers in this unit have increased fairly rapidly," they have well surpassed the level at which human/deer conflicts occur. The total harvest in our town has increased by 77% and more importantly the doe harvest more than doubled (increased 134%).

Yet, the plan's objective for this unit is to "decrease deer numbers *slightly* from current levels." We have a nuisance deer situation in Hanover, and believe that the draft plan's response is inadequate. Addressing the overpopulation of deer with focus on adult bucks only is also insufficient – we need an immediate ability to supply hunters with more doe tags.

Hanover has the highest incidence of Lyme Disease in our area of the state, and the deer tick population is soaring to the point where people have begun to express reluctance about going out onto the trails to enjoy our nature preserves. While we recognize that deer are not the only vectors for this disease, they are a key part of the picture. We are also concerned about the threat that overpopulation of deer in Hanover poses to our smaller but much cherished moose population, via transmission of brainworm.

Overpopulation of deer is threatening the health of our forests and the quality of our public water supply here in Hanover. Deer exclosures erected three years ago by Dartmouth College on our Balch Hill Natural Area are already demonstrating the impact of deer browse on native vegetation. Concerned about the impact of deer browse on biodiversity at this Natural Area, we

opened it to archers in 2013 and 2014. We heard from hunters who had permission to hunt there last fall, and all 16 indicated that they observed an overabundance of deer, their size was small due to the large population, and all hunters urged culling the herd for forest health. As a rule, they were not concerned with getting the "big buck" but rather with improving forest health by culling the herd to a more sustainable size.

On the nearby Trescott Company lands of our town's water supply, infestation by invasive buckthorn, honeysuckle, and barberry is clearly favored by heavy deer browse of natural regeneration. The quality of our town's future public water supply is therefore directly threatened by deer overpopulation. While we applaud the Department's interest in protecting biodiversity, a stronger and swifter response is needed to achieve this, at least in our area.

The state's traditional means of guiding deer management from the top down, using a long, drawn-out process for rule changes, has proven frustratingly unresponsive to changing conditions on the ground. Towns such as ours, that are witnessing damage related to biodiversity and habitat, need a chance to have their own management programs involving special hunts and tags, working in consultation with the state.

We conclude with our strong support for Goal 3 – "The New Hampshire Fish and Game Department will work alone and in partnership with state, federal, and public and private partners to minimize the loss of important deer habitat and to **conserve**, protect and enhance deer habitat on state, federal and private lands, through education and **through the expenditure of technical and financial resources.**"

BEAR

The plan's objective for our region calls for a 28% decrease in the bear population based on the Department's view that human population growth, associated anthropogenic food attractants and bear-human conflict levels warrant decreased bear numbers. While we note that bears have appeared in developed areas of Hanover, we do not condone such a drastic reduction in the population, and suggest that efforts to reduce the population will tend to focus on remote areas where there are few human/bear conflicts.

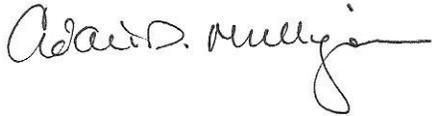
While we recognize that a limited baiting season is a useful tool for bear management, we urge the Department to ban the use of chocolate as a bait, and not rely on hunters to voluntarily abstain from its use. There are plenty of other substances that can be used, without resorting to a deadly substance that may harm animals that are not ultimately taken.

As owners of the Mink Brook Nature Preserve, where active bear habitat is surrounded by residential neighborhoods, we strongly support the Department's proposed public education efforts (Goal 3) so that residents are more informed on the behavior, ecology and management of black bears and are familiar with methods to minimize bear-human conflicts. We are engaged in such outreach efforts ourselves and are happy to assist the Department whenever possible.

We also strongly support Objective 4-1: Assist local, state, federal and private conservation groups and organizations to identify, document, protect, conserve and manage important bear habitat. We are hopeful for assistance in protecting more remote bear habitat in our town, such as near our Mayor-Niles Forest on Moose Mountain.

Thank you for your consideration of these remarks and for the opportunity to comment. The Hanover Conservancy highly values the staff and mission of the New Hampshire Fish and Game Department, and hopes to continue to serve as a helpful local partner.

Very truly yours,

A handwritten signature in black ink that reads "Adair D. Mulligan". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Adair D. Mulligan
Executive Director