

30 Morley Road  
Quincy, MA 02170  
October 7, 2015

Department of Conservation and Recreation  
Office of Public Outreach  
251 Causeway Street, Suite 600  
Boston, MA 02114

Dear DCR Public Outreach Representative:

Regarding the “Blue Hills State Reservation Draft Deer Management Plan”: I should say first that I fully support the spirit of DCR’s proposal to organize a controlled culling of white-tailed deer in the reservation. Though I am a hunter, that fact is, in many ways, irrelevant to my endorsement of the plan. Having read the full text of the proposal as well as the DFW technical report that preceded it—not to mention having spent no small amount of time in the Blue Hills Reservation itself—I can appreciate that DCR’s rationale for such an aggressive deer-reduction strategy centers almost exclusively on forest health (or rather, un-health) and how to improve it. During the three public meetings (all of which I attended), I found it telling that virtually none of the attendees raised any questions about or resistance to the information presented about the perilous condition of the forest ecosystem within the reservation. Rather, the public “conversation” became dominated quickly by opponents who focused their often exaggerated arguments on more contestable—but still tertiary—issues, namely the incidence and sources of Lyme disease in and around the Blue Hills. Yet anyone who has even a passing familiarity with forest ecology and deer biology and behavior understands that the data informing DCR’s culling proposal are as inarguable as they are urgent.

That said, the proposal is far from flawless—a result no doubt of the compressed timeframe in which it was drafted and rolled out. The plan’s weaknesses, however, are not insurmountable, nor do they warrant a year-long delay in implementing the program, as some have suggested. Instead, they could be addressed through a few careful, strategic revisions of the application process and the hunter-orientation program—all in the name of public safety and cull effectiveness.

Specifically, my main criticisms of the plan relate to hunter selection and training.

### **Hunter Selection**

As noted in the proposal, an estimated 22,000 hunters reside within 30 miles of the Blue Hills, and it is likely that a significant percentage of this number will submit applications for entry into the controlled-hunt lottery. Indeed, considering the lack of public hunting options available in eastern Massachusetts—and the unique opportunity a Blue Hills culling effort would pose to sportsmen and women—it is highly probable that a large number of hunters from across the Commonwealth, as well as non-residents, will apply for permits. (As David Stainbrook said in his presentation on 10/1, “hunter effort will not be an issue for this program.”) Thus, DCR will be faced with the daunting task of having to process perhaps *thousands* of applications in a very short timeframe with what I imagine will be limited staffing resources.

In order to “cull” the hunter herd (so to speak), DCR should consider making the hunter-eligibility requirements for the program more stringent. That is, in addition to possessing a valid Firearms Identification card and a current Massachusetts hunting license, applicants should, for example, be required (1) to have held a hunting license for a minimum number of consecutive years (three? five?) immediately prior to 2015, and (2) to have harvested a deer within that period. While part of me believes that all licensed hunters should be allowed to apply for a permit (if the program is approved), another, more pragmatic part recognizes that hunting in the Blue Hills will be as much, if not more, a privilege than a right, and should be reserved for those sportsmen and women who have demonstrated a certain minimum level of commitment and proficiency hunting big game with a lethal implement.

Allowing only more experienced hunters (by comparison) to apply for a culling permit might result in two outcomes. First, it could translate into a higher number of deer harvested during the four-day hunt, therefore enhancing the efficacy of the program in Year 1 (the most crucial year for building support for sustaining the initiative in future years). Second, and perhaps most importantly, it could quell some of the public-safety concerns expressed by residents from surrounding communities and by recreational users of the reservation. After all, in the eyes of some, more seasoned hunters are safer hunters—whether or not that’s actually true.

DCR could further limit applicants to Massachusetts residents only as a means to reduce the volume of applications the program will receive.

### **Hunter Training**

Assuming DCR’s deer-management proposal is approved for 2015, this will mean (by my estimates) that the selection of permittees will take place near the end of October or the beginning of November and that the hunter orientations will occur during the first and second weeks of November. Thus, this will give permittees only two to three weeks to prepare for their respective two-day hunts. In light of this short timeframe—combined with personal scheduling conflicts and fewer hours of daylight—it is probable that many of the 240 permit holders will have little time or opportunity to familiarize themselves with their assigned hunting territories within the Blue Hills. In fact, it is easy to imagine some permittees not stepping foot into the Blue Hills until the day of their assigned hunt. Add to this the fact many of the hunters will prefer to navigate to their stands or territories in the pre-dawn hours, and you have a recipe not for disaster but for potential error and inefficiency.

Thus, I recommend that in designing the hunter-orientation program for the Blue Hills hunt, DCR should *require* every hunter to scout his or her assigned hunting territory no later than one week prior to the opening day of the hunt. The scouting could occur as a formal “day-two” activity in the orientation program, whereby permittees, after participating in the main orientation session, would check in with DCR staff at a central location in the Blue Hills (Houghton’s Pond?) at a designated time, navigate to and scout their hunting territory, and then check out. Recognizing that this would require additional staff and planning resources, the scouting requirement could be fulfilled by honor code; that is, each hunter would be required to attest, under penalty of dismissal from the culling program, that he or she had, prior to the hunt, successfully navigated to and familiarized him or herself with the assigned hunting area.

Such a requirement would help reduce inadvertent hunter interactions and “clustering” on the days of the hunt and would, by extension, help maintain the one-hunter-per-30-acres ratio that DCR envisions for a productive and safe culling initiative.

On a personal note, I will admit that if this management plan is approved, I will apply. But whether or not I am selected, I would very much like to volunteer my time to help DCR and its partners implement the safe, effective, and publicly beneficial initiative that this program can very well be. I would leave it to the decision-makers who’ve brought the plan this far to determine how (or if) I could be of use.

I wish to end by thanking the many conscientious thinkers and actors who have moved this plan forward into the light of public conversation. I appreciate the opportunity to share these comments.

Sincerely,

A handwritten signature in black ink that reads "Brad D. Arndt". The signature is written in a cursive, flowing style with a large initial 'B' and a long, sweeping tail on the 't'.

Brad Arndt