



*Forging a partnership between farmers and consumers.
•Working together for Ohio's farmers•*

March 1, 2014

Chief Scott Zody
Ohio Department of Natural Resources
Division of Wildlife
2045 Morse Road, Building G
Columbus, Ohio 43229

Dear Chief Zody:

Ohio Farm Bureau Federation (OFBF) would like to thank you for the opportunity to review and submit comments on the division's proposed deer hunting regulations (OAC 1501:31-15-11).

OFBF is the largest voluntary non-profit agricultural organization in the State of Ohio, representing many farmers and landowners across the state. As such, we have a continuing interest in a variety of wildlife issues which affect our members. We also have a substantial amount of member-developed policy on wildlife issues, and those policies provide the basis for these comments.

I would like to thank you for meeting with Farm Bureau staff recently to discuss the division's proposed changes to deer hunting regulations. The discussion helps our organization better understand the many different considerations that have been made in the development of this proposal. The proposed deer regulations for 2014-2015 contain both provisions Farm Bureau supports and those which raise some concern.

Pistol caliber rifles

Farm Bureau supports the amendment to allow the use of certain caliber rifles, including traditional black powder cartridge or pistol cartridge rifles, during the deer gun season. Farm Bureau members recently adopted policy supporting use of these firearms at our most recent annual meeting.

Bag limit reductions

Overall, the proposed regulations decrease bag limits in 44 counties while increasing bag limits in only 5 counties. We understand this is part of an effort by the division to continue to reduce the deer herd while avoiding reduction past a target population point. Based on information we've received from you and your team, a number of indicators have been used to establish the new county bag limits including statistical trends related to the number of bucks harvested, insurance company statistics for deer-related car crashes, and even deer carcass removal from roadways conducted by the state.

A reduction in bag limits, such as proposed, could be counter-productive to the progress that has been made in reducing the deer herd in Ohio. We appreciate the fact that the division has used statistical information to guide decision making on the reduction of bag limits. However, the indicators used might not give a full picture of the true size and character of Ohio's deer herd.

Farm Bureau policy promotes increased bag limits in counties with higher deer populations and more deer damage. The division should consider deer crop damage reports as a formal part of your process for determining county bag limits. The establishment of county target populations that allow hunting to take place until that target is reached would also provide a solution to this concern.

Limits on antlerless deer permits

Limits placed on antlerless deer permits under the proposed regulations are also a concern. In general, OFBF policy supports the notion that hunters should be incentivized to harvest more does. Specifically, our policy suggests that hunters be allow to harvest up to six antlerless deer in overpopulated areas, and that antlerless deer tags be less expensive.

The proposed elimination of the ability to use antlerless deer permits in certain counties is of particular concern. Also, while not a new amendment, we have continued concern about antlerless permits being valid only through the Sunday following Thanksgiving Day. Antlerless deer permits should be available for use in all counties throughout the hunting season.

Reducing the deer herd in metropolitan and urbanized areas

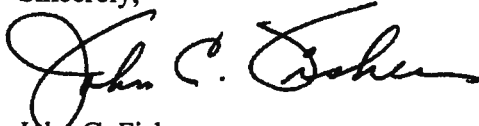
The new proposal does address the need continue to reduce the deer herd in urbanized areas by providing controlled hunts on public lands in various areas around the state, and by providing for the highest bag limits in counties that have urbanized areas. Farm Bureau policy directly supports these initiatives.

Automated game check system

One issue not addressed by the proposal, but is of interest to Farm Bureau is providing for the ability for landowners to utilize the automated phone-in game check system. While our policy would not support a mandatory permit or pre-registration for landowners, we believe that many landowners would voluntarily utilize an option of free pre-registration to enable them to call in their harvest.

In closing, we recognize the Division of Wildlife is seeking to obtain the right balance for Ohio's deer herd. Farm Bureau members are all too familiar with the fact that deer cause millions of dollars in crop damage every year in Ohio, and our state has traditionally been one of the highest risk states for automobile accidents caused by deer collisions. We appreciate the opportunity to promote our ideas related to hunting regulations that allow us to fight this costly and dangerous situation.

Sincerely,



John C. Fisher
Executive Vice President

Cc: OFBF Board of Trustees
OFBF Cabinet