

DOCUMENT: THE MISMANAGEMENT OF PENNSYLVANIA'S DEER HERD

Following is the complete 21-page account of the events surrounding the Game Commission's decision to reduce the statewide deer herd. It reveals the agenda behind the deer-reduction program, why and how it was accomplished, and who – the handful of people in Audubon, the Pennsylvania Department of Conservation and Natural Resources (DCNR), the State Legislature (Audubon's political agent), and the Pennsylvania Game Commission – were responsible.

THE MISMANAGEMENT OF PENNSYLVANIA'S DEER HERD

- **WHY IT HAPPENED •**
- **HOW IT WAS ACCOMPLISHED •**
- **WHO WAS INVOLVED •**

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PREFACE

For decades, the Pennsylvania Game Commission (PGC) has provided a relatively large deer herd primarily for the benefit of sport hunting under a "maximum sustained yield" management philosophy. This traditional wildlife management philosophy was designed to support the maximum number of deer that was possible on a yearly basis without harming the state's forests. About the year 2000, the Game Commission, in cooperation with the Pennsylvania Department of Conservation and Natural Resources (DCNR), concluded that the forest was not sustaining itself, and that the size of the deer herd needed to be reduced. The Game Commission's new objective was, therefore, to reduce the deer herd to a point that would result: (1) in healthier forests, (2) in healthier deer, and (3) in fewer conflicts between deer and humans. Ensuing was the dismantling of the commonwealth's deer herd by up to 75% and more in some parts of the state.

Many sportsmen, however, vehemently disagree with this new deer management philosophy. For generations sportsmen have been accustomed to a fall tradition that has been passed on from parent to child. It reaches back for not just decades, but for generations; and for many sportsmen who go afield with muzzleloading firearms, it is a tradition that remains relatively unchanged since our colonial founding. Change from a tradition that is so strong and longheld is very difficult, and which a significant number of sportsmen believe is not needed. As a result, the state's conservation community has become polarized, with state conservation agencies promoting change while sportsmen try to cling to tradition. There are more than just the roughly 1,000,000 sportsmen and their associated millions of family members and friends who are affected by the new policy, not the least of which are those citizens and businesses who depend upon the many hundreds-of-millions of dollars that are generated yearly by the outdoor sporting industry. This represents a significant part of our state economy, and so this deer management issue reaches beyond the realms of science and tradition, beyond recreation, and forestry, and agriculture. There is an economic concern that must be realized as well. Pennsylvania deer management is a problem that has affected the credibility of the Pennsylvania Game Commission, and intends to exacerbate a currently declining trust by the citizens of the commonwealth in state government. It is, therefore, likely to affect public confidence in other state agencies as well as the legislature and office of the governor.

Although the Game Commission has presented scientific evidence to support its new management policy, and, therefore, has assured the sportsmen that the policy is based upon a sound scientific foundation that is in the long-term best interest of sportsmen; many sportsmen do not accept the new deer management policy as being rooted in sound scientific principle nor in the best interest of sportsmen and the sport of hunting.

This document confirms the belief of many sportsmen that the commonwealth's deer herd is not being scientifically managed. Documentation is, herein, presented which demonstrates that neither the best interests of sportsmen, sound science, common sense, the state's economy, nor even the best interest of the Game Commission itself has been the driving force behind the deer management program, but instead a new agenda-driven philosophy that has been spearheaded by Audubon.

Following are the details regarding *"The Mismanagement of Pennsylvania's Deer Herd"*. From Audubon, DCNR, and related documentation, this dramatic and permanent reduction of the commonwealth's deer herd has been accomplished by about 13 people – the principal architects of the PGC's deer reduction program.

ABSTRACT

In 1999, Pennsylvania Audubon and the Pennsylvania Chapter of the Sierra Club held a conference in Harrisburg toward reducing the statewide deer herd. By 2001, Audubon had assembled a team of like-minded independent people and state agency personnel in DCNR and the PGC, and had formulated an agenda-driven plan toward replacing the traditional time-tested and decades-old **maximum sustained yield** wildlife management philosophy with their new **ecosystem management philosophy**. This conflict represents the classic natural resources management struggle between two opposing philosophies – **conservation** (wise use of natural resources) versus **preservation** (non-consumptive use of natural resources). In 2004, Dan Devlin, DCNR's Chief Forester, had coauthored with three employees of the Nature Conservancy a long-term (centuries-long) forest management plan for the commonwealth toward the creation of 500,000 to 1,000,000 acres of old growth forests in Pennsylvania – representing $\frac{1}{4}$ - $\frac{1}{2}$ of state forest lands; it required the dramatic and permanent reduction of the deer herd. In 2005, Audubon (using the name recognition and writing skills of Roger Latham (Jr)), wrote a 362-page ecosystem management/deer reduction document that was assisted by Calvin DuBrock and Chris Rosenberry of PGC, acknowledged Gary Alt and Vern Ross of PGC as participants, and promoted the merger of PGC (and PFBC) into DCNR -- because DCNR was more natural-resources-friendly with Audubon. In 2009, Dan Devlin of DCNR assembled a group of like-minded individuals to certify his (DCNR's) Audubon-designed ecosystem management plan; it required the dramatic and permanent reduction of the deer herd using DMAP as the principal tool.

According to these documents, the commonality among the above-mentioned events is that the success of the Nature Conservancy's old growth forest plan and of Audubon's ecosystem management plan is dependent upon the dramatic and permanent reduction of Pennsylvania's deer herd – accomplished by gaining support of select policy-makers within the Game Commission. Toward this end, Audubon and the Nature Conservancy co-opted a handful of policy-makers in both DCNR and the PGC, and instituted the permanent reduction of deer using high antlerless allocations, the concurrent buck/doe season, antler restrictions, and especially DMAP. Sportsmen, therefore, were the tool that was used to accomplish this Audubon/Nature Conservancy agenda – thus using sportsmen as the mechanism to inflict their own demise.

In 2007, John Eveland (forester, wildlife biologist, and ecologist who had conducted the commonwealth's first statewide research and written the first management plans for two of the state's three big game mammals – bears and elk) submitted a proposal to conduct a scientific, independent, and unbiased examination of the PGC's deer management program to Rep. Ed Staback (Chairman of the Pennsylvania House Game and Fisheries Committee) toward resolving the deer-wars conflict. The proposal was enthusiastically accepted, and was placed in the state budget by Reps. Staback and Dan Surra with the approval of Rep. Dwight Evans (Chairman of the House Appropriations Committee). On July 16, 2007, the night of passage, the study was removed from the budget – reportedly through collusion among PGC, Rep. Dave Levdansky, and Rep. Dwight Evans. Although Rep. Staback attempted to gain alternative funding for the study during the next six months, efforts were stonewalled by Rep. Levdansky. Levdansky used this opportunity to replace the Eveland/Staback study with a 23-question audit that was written by the PGC or close associate and was designed to give a positive response to each question. Because others (including some elected officials) were knowledgeable of this fraudulent attempt by Levdansky to certify the PGC's deer management program while implying that he was supporting the best interests of sportsmen, he was not able to commence the fraudulent audit until mid-2009. Levdansky ignored a State House of Representatives Resolution (HR 642) by inserting (switching) 15 of his original 23 questions into the request-for-proposal in place of the HR 642 directive. To compound the fraud, Levdansky selected Wildlife Management Institute (Scot Williamson) to conduct the audit by providing the answers to the audit's 15 PGC-designed questions. Scot Williamson, as a representative of WMI, had been one of the principal speakers and supporters of the 1999 Harrisburg reduce-the-deer conference which had been sponsored by Pennsylvania Audubon and the Sierra Club. He was quoted by Ben Moyer in a 1999 Pittsburgh Post-Gazette Sunday newspaper article *as praising those who made such an important first step (in new deer management) on that day*. Therefore, neither the audit nor the auditor were unbiased and the WMI report, which certifies and supports the PGC's deer management program except for an occasional "slap on the wrist", was predesigned toward this end.

I. INTRODUCTION

For many decades, Pennsylvania has been acknowledged as one of the top deer hunting states in the nation. This success was achieved using years of scientific research and sound management decisions, and produced the maximum harvest of deer that could be sustained over time without affecting the overall health of the forest and its ability to regenerate trees for timber and other forest products. Hand in hand with foresters, a silvicultural management plan permitted the normal rotational harvest of timber that resulted in the commonwealth's ranking as one of the top hardwood producers in the world.

For decades, therefore, game and forest management was in a balanced state that provided for the maximum sustainable supply of both deer and timber, a traditional natural resources management philosophy that is commonly referred to as **CONSERVATION** – the wise use of natural resources. It is a consumptive natural resources approach that is designed to produce wildlife and wood products for both sportsmen and the general citizenry, and its success has satisfied over a million sportsmen each year with bountiful deer and game animals, has provided wood products and tens-of-thousands of jobs within the forest industry, and has maintained one of the nation's largest sport hunting and outdoor-related industries.

II. CONVINCING SPORTSMEN TO REDUCE THE DEER HERD

About a decade ago, the Pennsylvania Game Commission (PGC) sent its most respected employee on a mission to convince sportsmen that reducing the size of the deer herd was in their best interest.

For months, Gary Alt made an infamous journey throughout Pennsylvania – speaking to sportsmen about the "sound-science" need to reduce the deer herd because deer were destroying the state's forests. Sportsmen were told that deer numbers had been too high for many years and that it was necessary to reduce the herd to a smaller size that would permit the forest to recover. When asked how great and for how long the herd reduction would be, sportsmen were told that as the forest recovered, PGC would be able to increase the size of the herd to a number of deer that was in better balance with the ecosystem -- but no bottom number had been determined.

This message by itself would not likely have convinced sportsmen to "follow the piper". But the Game Commission added an incentive as a "carrot" to gain their support of this new deer program. Gary proposed imposing antler restrictions that would make it illegal to shoot most yearling buck. This would permit young buck with less than six points to gain an extra year in age and a larger set of antlers to six, eight, or even ten or more points. The prospect of bagging a large buck was likely the single element that won the approval of sportsmen to reduce the size of the herd.

Gary was likely the only person whom sportsmen would entrust with such a dramatic change in deer management, and so many sportsmen accepted Gary's plea to reduce the size of the herd: partly because Gary spared no statistic toward convincing sportsmen that it was in their best interest, partly because Gary used the prospect of more large buck through new antler restrictions, and partly because sportsmen could not believe that they would be deceived by Gary. No quantitative number of deer or deer density had been calculated to determine the low point at which herd reduction should end, only that the herd would continue to be reduced until an as-yet undefined level of forest regeneration would occur.

White-tailed deer are the flagship of Pennsylvania's hunting and wildlife community, and it is unlikely that sportsmen would have entrusted the wellbeing of their most valued resource with anyone except Gary Alt. Gary and the Game Commission knew this, and abused this respect.

It should be noted that a leader in the Pennsylvania senate asked John Eveland to accompany him to one of Gary Alt's earliest presentations, and to scientifically assess the new deer program. John Eveland is a forester, wildlife biologist, and ecologist who had conducted statewide bear research prior to Gary Alt, as well as having conducted the state's first elk research. Following Alt's presentation, Eveland informed the senator that "the program was doomed for failure, and that Gary would be 'run-out-of-town-on-a-rail' within a few years." Eveland presented the senator with a formal statistical analysis regarding the projected statewide impact to the deer herd. Within a few years, the assessment had been realized.

III. DECIMATION OF THE DEER HERD

Therefore, about a decade ago Gary Alt and the Game Commission initiated a new statewide deer management program to dramatically and permanently reduce the size of the deer herd. What ensued was the rape of one of the commonwealth's most important resources. Through 2009, the herd was systematically reduced using the increased allocation of antlerless licenses, the increased allocation of DMAP permits, antler restrictions (which wastes an estimated 40-50% of the yearling buck resource each year), and a concurrent buck and doe season. Although the PGC claims that the herd has been reduced by 25%, it is believed that the herd may have been decimated by 75-85% in many areas. In north central areas of the state, estimates of deer densities as low as 1-2 deer per square mile indicate a program that has superceded the realm of "sound science". At such low numbers, a deer herd could take decades to recover even if left unhunted.

The impacts to sportsmen, to the state's economy, and to the Game Commission itself have been devastating. Pennsylvania's hunting tradition is in jeopardy. Sportsmen who fail to even see a deer during hunting season, let alone bag one, are losing interest. This is especially evident for young hunters, the future of sport hunting, whose ranks have declined by 10% in the last 10 years – since the new deer program was begun. General license sales had declined from a high of about 1.2 million hunters to about 800 thousand – a 1/3 decline in the ranks of sportsmen. Lodges and outdoor businesses have gone bankrupt, jobs lost, and the economy has suffered by possibly hundreds of millions of dollars and more.

Along with the decline in hunting licenses comes the lost revenue to the Game Commission – and the financial solvency of the Game Commission itself is at risk. Insolvency leads to talk of a merger with DCNR, and thus jeopardizes the very autonomy of the Game Commission to exist as an independent agency.

However, there is another serious threat that is growing as hunters fall from the ranks. Sportsmen represent the greatest advocates of our Constitutional Second Amendment Right to keep and bear arms. There are many who wish to remove guns from the hands of citizens, and without sportsmen to stand in the way, it might be only a matter of time until our right to keep and bear arms would be denied. Pennsylvania has traditionally fielded over a million sportsmen advocates of our Second Amendment, but with the declining ranks of hunters due to our decimated deer herd, the risk to this Constitutional right is increasing.

How has all of this happened, and why would the Game Commission not only participate, but cause such a catastrophic event to occur even at the risk of destroying their own agency?

IV. THE GAME COMMISSION'S DEER MANAGEMENT GOALS

It took about half a decade after initiation of the reduce-the-deer program for PGC to establish goals toward justifying herd reduction. Three after-the-fact goals were prepared for sportsmen:

- to improve the health of the forest.
- to improve the health of deer.
- to reduce deer/human conflicts.

However, when the new deer program was initiated, it had not been determined that the forest was, in fact, in poor health, nor were deer in poor health. **Regarding forest health**, in 2009, the Vice Chair of the Keystone Wood Products Association stated to the Pennsylvania House Agricultural and Rural Affairs Committee that the state's forests were *"the healthiest forests, the best quality and the most diverse mix of hardwood species of anywhere in the world, bar none."* In addition, even after the deer herd has been reduced by an estimated 75% or more in some areas, the forest has failed to regenerate, indicating that another factor, such as acid rain, might be adversely affecting forest regeneration more than deer. That such draconian actions were initiated by the PGC without testing this premise is grounds for dismissal of those who perpetrated this deer-reduction action. The impacts to sportsmen, family businesses, and the state's socioeconomy have been so great, that had this action been perpetrated by individuals outside of the agency, those at fault would have likely been legally prosecuted.

Regarding the health of deer, results from the 2009 audit of the deer program by the Wildlife Management Institute exposed some startling data. A long-term deer embryo count study that had been conducted by PGC from 2000-2008 (after the deer-reduction program had been initiated) was a major focus of the WMI audit. The premise of this embryo-count study supposed that average embryo counts of at least 1.50 embryos per adult doe would indicate that both the deer herd and thus the forest were in good health. Quoting Christopher Rosenberry from an actual Game Commission study, *"For 2-year-old females, at least 1.5 embryos per doe was considered good and less than 1.1 embryos was considered poor."* Although not stated in the audit, the results (as presented by Scot Williamson in the WMI audit) indicated that the statewide deer herd was not in poor health from 2000-2008; that the forest was, therefore, not in poor health from 2000-2008; and that, in fact, the forest was actually below deer carrying capacity – thus indicating that the statewide deer herd could have been even higher without ill-effects to the health of the forest. Without this knowledge in hand, select staff of the PGC had initiated a now decade-long draconian reduction of the statewide deer herd. It should be noted that WMI concluded this embryo data to be statistically invalid and, therefore, that it should be disregarded; however, it is likely that this embryo count data was dismissed because it provides scientific evidence that the reduce-the-deer program was, in fact, not scientifically justified. This data (resulting from the PGC's own survey and as listed in the WMI audit) indicates that average embryo counts for all WMUs from 2000-2008 ranged between 1.51 and 1.61 – all above the 1.50 embryo benchmark that signifies (according to independent scientific research) healthy deer, and thus, a healthy forest; and well-above the 1.1 embryo level that indicates unhealthy deer, and thus an unhealthy forest.)

Therefore, if the forest has not been in poor health and if deer have not been in poor health, then why did the Game Commission permanently reduce the deer herd – an act that would result in a loss of possibly 200,000-400,000 sportsmen and thus the loss of hunting license sales; loss of hunting interest by our youth (the future of hunting); the destruction of many outdoor-related businesses, lost jobs, and upwards of hundreds of millions of dollars in socioeconomic losses; and even the risk of losing financial solvency for the PGC itself, which would likely result in PGC's destruction as an autonomous state agency by merging it into the Department of Conservation and Natural Resources (DCNR)?

V. THE AUDUBON AGENDA TO DECIMATE THE HERD / WHY THE DEER HERD WAS REDUCED, AND HOW IT WAS ACCOMPLISHED

On September 25, 1999, a conference entitled "The Impact of White-tailed Deer on the Biodiversity and Economy of Pennsylvania" occurred in Harrisburg. Principal sponsors were the Pennsylvania Audubon Society and the Pennsylvania Chapter of the Sierra Club. Attendees introduced a new "school of thought" regarding deer management, and focused on the negative impacts of deer on forests and economy.

The main speakers included Bryon Shissler, Susan Stout, Cindy Dunn, and Calvin DuBrock. In addition, Scot Williamson of the Wildlife Management Institute made a presentation entitled "What can be done? What is being done?" Ben Moyer provided the summary presentation, and the keynote (dinner) speaker was Gary Alt.

In a following Sunday Pittsburgh Post-Gazette newspaper article by Ben Moyer, Scott Williamson of the Wildlife Management Institute (WMI) expressed his support of the reduce-the-deer conference by stating, "Those who organized and attended the conference have made an important first step toward progress. This conference illustrates the diversity of people today that have concerns about deer", Williamson said. (Note that in 2008, Rep. David Levdansky would select WMI and Scott Williamson as the independent unbiased auditor of his 15-question "fixed" review of the Pennsylvania Game Commission's (PGC's) deer program. See the following Section IX.)

A second step for this Audubon agenda occurred in April 2001, when *"the Pennsylvania office of the National Audubon Society asked a group of professionals to look at deer management from an ecosystem perspective... that aims to conserve native biodiversity."* This Audubon forum explored their new "Ecosystem Management Plan" that was designed to promote greater understory density and biodiversity within Pennsylvania's forests. Their goal to increase native wildflowers and nongame animals was dependent upon the dramatic reduction of the state's deer herd. The forum was attended by staff members of PGC and DCNR.

In 2005, Audubon conducted another forum and prepared a 362-page master plan for achieving their Ecosystem Management agenda through the drastic reduction of the deer herd, entitled "Report of the Deer Management Forum". The forum was intended to *"set forth a vision of what ecosystem-based deer management might entail in large forested areas of the eastern United States, using Pennsylvania as an example"*. Its authors were: Roger Earl Latham, Jan Beyea, Merlin Benner, Cindy Adams Dunn, Mary Ann Fajvan, Ronald Freed, Marrett Grund, Stephen Horsely, Ann Fowler Rhoads, and Bryon Shissler. The master plan acknowledged those who assisted, stating, "We are grateful to those...Robert C. Boyd, Calvin W. DuBrock, Chris Rosenberry, and Vernon R. Ross, Pennsylvania Game Commission." Reviewers included Ben Moyer, Timothy Schaeffer, and Susan Stout. Also, as stated on the first page of the document, *"Two former Game Commission staff members felt that discussion of external critiques of the agency was inappropriate and counterproductive...and withdrew their names from the report."*

This 2005 Audubon master plan began by stating, *"The group's top-priority recommendation was that deer be managed on an ecosystem basis. This report presents a vision of how that might be done."* It continues, *"The mission of the Pennsylvania...Audubon...is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the Earth's biological diversity."* *"The abundance of native wildflowers and other forest-floor plants has been greatly diminished, shrub species have been dramatically decreased..."*

Three pages of this 362-page document are devoted to Audubon's strategic plan toward accomplishing their agenda in Pennsylvania through decimation of the deer herd. Fifteen (15) "Major Findings Regarding Policy and Administration" were listed. A few quotes from Audubon's strategic plan include:

- *"The goal of bringing back the understory vegetation..."*
- *"...deer densities in Pennsylvania are too high from an ecosystem perspective."*
- *"...deer will continue to decimate flora and fauna without:
a. enhanced DMAP regulations that allow more liberal harvest of antlerless deer on state forest lands and are granted to DCNR;
b. legislative fiat, whereby administration and control of deer hunting regulations on District Forests are transferred from PGC to DCNR;
c. merger of PGC with DCNR..."*
- *"Ecosystem considerations...that deer densities should be reduced below levels that would be set solely by considerations of deer health and condition. This would require targets even lower than those PGC has been unable to reach in the past."*
- *"With the reorganization in 1999 of the Wildlife Management Bureau (with Dr. Gary Alt named chief of the newly formed Deer Management Section) and the support of agency policy makers, PGC is poised to pursue a more aggressive deer management program that, in theory, can effectively reduce deer densities in many parts of Pennsylvania. Its success depends critically on whether the changes are formalized in a way that enables them to last through the turnover of personnel on the staff and Board of Commissioners."*
- *"Although the PGC staff is strong in the areas of deer biology and in implementing and enforcing regulations to make hunting safe, the current staff has limited expertise in the field of general ecology."*
- *"...at present DCNR cannot fully implement ecosystem management on its lands because it does not have the necessary authority to manage deer populations in state forests and state parks."*
- *"...in favor of combining PGC, PFBC, and DCNR into a single agency..."* Continuing, *"...achieving a change of this magnitude would require an improbably large expenditure of political capital."*

Again, it must be understood that these statements are quotations from a 362-page 2005 Pennsylvania Audubon master-plan document – the ecosystem management "bible" that is the driving force behind the PGC's deer-reduction program. Authors include Roger Latham (Jr), Merlin Benner, Cindy Dunn, Marrett Grund, and Bryon Shissler. Acknowledgements included Calvin W. DuBrock, Chris Rosenberry, and Vernon Ross.

Audubon is using the name recognition and writing skills of Roger Latham (Jr) to promote its ecosystem management agenda. Roger Latham (Jr) has been the author and spearhead of their agenda for at least a decade.

Audubon has been successful in co-opting a small contingent of high-ranking staff in both DCNR and the PGC, as well as a few members of PGC's Board of Commissioners (BOC), who then designed and implemented the deer reduction program under the guise of sound science. Dan Devlin, DCNR's Chief Forester, is an adamant supporter of Audubon's agenda and has been successful at co-opting several

members of PGC's staff, including: Calvin DuBrock, Gary Alt, Chris Rosenberry, Vern Ross, and select members of the previous and current Board of Commissioners.

Independent promoters of Audubon's agenda that continue to play a significant role in the reduce-the-deer program include Byron Shissler and Marrett Grund. Tim Schaeffer and Cindy Dunn are former Presidents of Pennsylvania Audubon and promoters of the deer program who have infiltrated PFBC and DCNR (respectively) as high-ranking employees.

One state legislator – Rep. David Levdansky – continues to be a useful tool of Audubon to facilitate its ecosystem management agenda, to promote PGC's deer-reduction program, and to pursue the elimination of the PGC by merging it into DCNR. As Audubon's legislative agent in their reduce-the-deer program, Rep. Levdansky is subverting sportsmen, deer hunting, Second Amendment Rights to keep and bear arms, the PGC Board of Commissioners (BOC), and the PGC itself as an independent autonomous agency – while posing as a friend of sportsmen.

A handful of outdoor writers for prominent newspapers in Pittsburgh (Tribune Review and Post-Gazette) and Philadelphia (Inquirer) have also been co-opted and are supporting Rep. Levdansky toward convincing sportsmen that the BOC is dysfunctional and the enemy of sportsmen, that the deer management plan is in the best interest of sportsmen, and that it is in the best interest of sportsmen to eliminate the BOC and PGC by rolling it into DCNR. This act would assure that the deer reduction program would remain permanently intact.

There was, and remains, an orchestrated effort by Audubon, select staff of DCNR, select staff of the PGC, and Rep. David Levdansky to convince the public and sportsmen that the deer reduction program is in the best interest of sportsmen and is based on sound science. Key participants in Audubon's ecosystem management/reduce-the-deer agenda are listed in a table in Section XII of this document, along with the handful of principal architects who are, for the most part, responsible for the dramatic reduction of Pennsylvania's deer herd.

VI. DCNR'S DEER-REDUCTION PARTNERSHIP WITH THE NATURE CONSERVANCY

In April 2004, DCNR State Forester Dan Devlin and three members of the Nature Conservancy co-authored a publication entitled "System Design and Management for Restoring Penn's Woods." Quoting the publication, *"Pennsylvania has embarked on establishing a half-million-acre old-growth system within its 2.1 million acres of state forests."*

Continuing,

- DCNR *"now proposes to establish the second-largest area in the eastern United States dedicated to the restoration and perpetuation of old-growth forest conditions, smaller only than New York's Adirondack State Park."* *"The composition of many forests has been restricted by deer overbrowsing..."*
- *"The result is that Pennsylvania faces a decades – or even centuries-long gap before old- growth forest functions return to the commonwealth's forest lands."*
- *"Reducing Pennsylvania's deer population will likely require a long-term political process."*
- *"This will not be easy..."*

Therefore, this document demonstrates that DCNR, through its State Forester, Dan Devlin, and in partnership with the Nature Conservancy, has proposed the development of a system of old-growth forests encompassing 500,000 up to a million acres of the 2.1 million-acre state forest system – accomplished through the drastic and permanent reduction of the state's deer herd. Reducing the deer herd will require the help of a politician. This planned agenda will require decades or even centuries to complete.

VII. DCNR'S DEER-REDUCTION PARTNERSHIP WITH AUDUBON

On February 18, 2009, the Pennsylvania Department of Conservation and Natural Resources (DCNR), Bureau of Forestry released a 49-page document entitled "Monitoring Deer Effects on Forest Ecosystems in Pennsylvania State Forests." It was commissioned by Dan Devlin, the State Forester of Pennsylvania (as head of DCNR's Bureau of Forestry), and its authors were: Roger Early Latham (Editor), Marrett Grund, Stephen Horsley, Benjamin Jones, William McWilliams, Clayton Nielsen, Christopher Rosenberry, Robert Seymour, Bryon Shissler, and Donald Waller.

Two major topics were addressed by State Forester Devlin: (a) the new plan for forest ecosystem management, and (b) deer reduction issues, especially *"about where the Pennsylvania Game Commission's Deer Management Assistance Program (DMAP) should be targeted."*

Therefore, this document demonstrates that DCNR, through its State Forester, Dan Devlin, has partnered with Pennsylvania Audubon in changing from DCNR's traditional "maximum sustained yield" forest management plan to Audubon's new ecosystem management philosophy – accomplished through the drastic and permanent reduction of the state's deer herd.

Only a handful of people, as evidenced by the authors and those acknowledged in the previously-mentioned documents, seem to be involved in the successful reduction of the commonwealth's deer herd, and, therefore, in achieving the goals of the ecosystem management agenda. Since its inception over a decade ago, Roger Earl Latham appears to have been the principal architect of the ecosystem management plan, and has been a coordinator for promoting the agenda within Audubon, DCNR, and the Game Commission.

VIII. OTHER ATTEMPTS BY DCNR AND PGC TO CERTIFY AUDUBON'S NEW ECOSYSTEM MANAGEMENT PLAN AND THE DEER REDUCTION PROGRAM

Forest Regeneration Study. In 2006 (six years after the fact), Merlin Benner published his report on deer browsing versus forest regeneration toward confirming that deer were continuing to destroy Pennsylvania's forests. Although the report concludes that the deer herd is a destructive force on Pennsylvania forests that has not yet been reduced far enough nor for a long enough period, this conclusion seems to contradict the data within the report, which indicate that nearly 90% of forest regeneration is experiencing either no browsing or only moderate browsing from deer. Data from the report indicate that only 4% of state forest regeneration is heavily or severely browsed.

Green Certification Study. On or about 2008, DCNR employed a California-based auditor (Scientific Certification Systems) to conduct a review of DCNR's forest ecosystem management plan toward achieving "Green Certification". The first paragraph of the audit reads as follows:

"The Pennsylvania State Forests, managed by the Department of Conservation and Natural Resources (DCNR) Bureau of Forestry (BOF), has undergone a third-party review of the sustainability of the forest ecosystems on these lands, a process known as Green Certification. Scientific Certification Systems (SCS) was the auditor. This process found that the primary factor threatening the sustainability of these forests is overbrowsing of vegetation by white-tailed deer. In response to this threat, and as a condition for DCNR to retain "certification" , the auditors required the following CAR (Corrective Action Requests)."

Continuing as the second paragraph of the audit:

*"The Pennsylvania deer density problem cannot be designed and implemented solely by BOF because **currently** the Pennsylvania Game Commission regulates deer seasons, bag limits, antlerless licenses and all other regulatory functions used to reduce deer density by hunting."*

In the short third paragraph of the audit, the term "DMAP" was used 10 times as the principal means for controlling deer densities on state forest lands.

This is a highly technical 27-page audit regarding deer biology in Pennsylvania, the health of the forest, and corrective deer-reduction measures. Although this audit is intended to lead the reader to believe that it was independently conducted by a California-based group, telephone discussions with leaders of SCS have left little doubt that SCS simply rubber-stamped this document which likely had been predesigned and prewritten by "other" interested parties in Pennsylvania. The cover, title page, and other introductory pages, which would have shed light on the identity of the authors and those who were acknowledged by the document, had been removed from this DCNR audit.

Pinchot Report. In April 2009, Bryon Schissler and Marrett Grund (a former PGC biologist) authored a report sponsored by the Pinchot Institute that certified PGC's deer management plan and the new ecosystem management philosophy as the most progressive and enlightened program in the nation -- stating that other state's did not employ this management method. In the report, Shissler referred to the traditional maximum sustained yield management philosophy as archaic agricultural mentality. The report was intended to certify PGC's deer management program. However, because other states employ the traditional "maximum sustained yield" philosophy for forest and wildlife management, opposition to this new DCNR/PGC ecosystem management philosophy may wonder if Pennsylvania is actually "ahead of the curve", or instead "out in left field".

It should be noted that both Bryon Shissler and Marrett Grund were co-authors of the 2005 Audubon master plan (Audubon's 362-page ecosystem management/deer-reduction master plan), as well as co-authors of the 2009 DCNR ecosystem management/deer-reduction plan. Shissler was also a key speaker at the 1999 Audubon-sponsored reduce-the-deer conference in Harrisburg; and, along with Susan Stout, Cindy Dunn, Scot Williamson, and Ben Moyer, was a member of the pre-2000 "Deer Management Working Group".

The WMI Audit. In February 2010, WMI submitted the final results of their audit – a literature review process of PGC documents which only addressed 15 questions from the original "fixed-question" audit that Rep. Leviansky and Audubon's Tim Schaeffer, respectively, had first presented to Rep. Staback on July 26, 2007 and again on October 3, 2007. This report was intended to provide the final official certification of PGC's deer management program, and except for a few minor "slaps on PGC's wrist" for effect, WMI accomplished its task.

IX. AUDUBON'S LEGISLATIVE PARTNER, STATE REP. DAVID LEVDANSKY / ATTEMPT TO FRAUDULENTLY CERTIFY THE DEER-REDUCTION PROGRAM AS BEING "SOUND SCIENCE"

Pennsylvania Audubon, the Nature Conservancy, and DCNR (State Forester Dan Devlin) all indicated that accomplishing the old-growth forest system and ecosystem management plan through the reduction of the state's deer herd would, according to Audubon, *"require a large expenditure of political capital"*, and according to the Nature Conservancy, *"require a long-term political process."* The politician who serves Audubon and its partners as their agent to reduce the deer herd is State Representative David Levdansky (D-39), Elizabeth.

In May 2007, a proposal was submitted by John Eveland (independent forester, wildlife biologist, and ecologist) to State Rep. Ed Staback, Chairman of the House Game and Fisheries Committee (HGFC), to conduct an independent scientific investigation of PGC's deer management program. Eveland has extensive experience in wildlife research and management, having conducted in the late 1960s and '70s the first statewide research and written the original management plans for two of the state's three big game mammals – bears and elk. He has conducted research on wildlife and ecosystems, and on energy and environment within over 30 states and provinces throughout North America. Witnessing the magnitude of the issue, Eveland had decided to offer his services in conducting a scientific assessment of the deer population and the PGC's management program. The study was supported by HGFC Chairman Staback and Rep. Dan Surra, and was approved for inclusion in the state budget by Rep. Dwight Evans (Chairman of the House Appropriations Committee). This thorough scientific study of PGC's deer program was intended to solve the ongoing question as to whether the new deer management program (to dramatically and permanently reduce the deer herd) was based on sound science, and if it was justified.

On July 16, 2007 (the day of budget passage), the study was removed from the state budget. It was reportedly blocked by Rep. David Levdansky, Rep. Dwight Evans, and the PGC. It should be noted that Reps. Evans and Levdansky had previously supported legislation to restrict firearms in Pennsylvania, and that Rep. Levdansky had previously pursued the merger of PGC into DCNR.

For about six months (from July 17, 2007 through January 2008), Rep. Staback and other legislators (including Representatives Dan Surra and Merle Phillips) tried to gain alternative legislative funding for the study, but were repeatedly stonewalled. However, while Rep. Staback and others were trying to gain funding for a legitimate scientific study of the new deer program, another story was unfolding.

On July 26, 2007 (10 days after budget passage and the removal of the Eveland/Staback proposal from the budget), Rep. Levdansky presented Chairman Staback with his own version of an audit, and tried to convince Rep. Staback to drop Eveland's study. Rep. Staback refused. Within an hour the Levdansky audit was discovered to be fraudulent, and likely authored by the PGC. The audit's questions were designed to yield a positive response in favor of the PGC's deer program.

On October 3, 2007, Tim Schaeffer of Audubon attempted to convince Chairman Staback to drop Eveland's study and conduct his (Audubon's) audit. Again, Rep. Staback refused. As before, within an hour the Audubon audit was found to be not only fraudulent, but the same **exact** audit that Levdansky had presented to Chairman Staback on July 26. Hence, the affiliation between Audubon and Levdansky was exposed.

Having been frustrated for about six months by the unending pressures from Levdansky, in January 2008 Rep. Staback informed Eveland that he could no longer pursue their independent scientific study.

Therefore, this concession to Levdansky "opened the door" for Levdansky to initiate his original cursory audit of the deer program – the original audit which he and Tim Schaeffer of Audubon had proposed to Rep. Staback, respectively, in July and October of 2007, which Rep. Staback had rejected on the spot on both occasions, and which had been labeled as being fraudulent.

In January 2008, Rep. Levdansky assumed victory over Rep. Staback in a Pittsburgh Tribune-Review newspaper account -- identifying himself as a sportsmen's hero by conducting an audit of the PGC deer program through the Legislative Budget and Finance Committee (LBFC), a committee on which he played a dominant role as Treasurer. In reality, however, Levdansky had subverted sportsmen and deer hunting in favor of PGC's agenda to reduce the deer herd -- while taking credit for seeming to act in the best interest of sportsmen.

Therefore, Rep. Levdansky had finally succeeded after a six-month effort to prevent Rep. Staback and HGFC from conducting their independent, scientific, thorough one-year study of the PGC's deer management program in favor of conducting a cursory and fraudulent audit – designed to address, through literature review and interviews with PGC staff, 23 questions that were not written by Levdansky but by the PGC itself or close affiliate, that were designed to yield a positive response in favor of the PGC deer program, and that would be reviewed for comment and approval by PGC before the final report was made available to the public. He had removed jurisdiction for conducting the deer study from the House Game and Fisheries Committee (HGFC), and shifted the responsibility to the Legislative Budget and Finance Committee (LBFC) which had no on-staff biological expertise – eliminating the prospect of a legitimate scientific study of the issue, and assuring certification of PGC's deer program.

At that time, Senator John Pippy (Chairman of LBFC) questioned why a study of deer and the Game Commission would be conducted by the Budget and Finance Committee instead of the Game and Fisheries Committee. The answer is now known.

Senator Pippy, therefore, independently recognized this as possibly being a fraudulent audit because it was not likely authored by Rep. Levdansky (but instead possibly by the PGC itself), because of the effort that Levdansky had expended to remove it from HGFC to be placed in LBFC where Levdansky would have near-total control of the audit process, and because Levdansky had struggled for over six months to conduct "his" version of an audit instead of an already-approved study by Rep. Staback and HGFC. Therefore, Sen. Pippy stated that he shifted responsibility for the integrity of the audit from his (Pippy's) shoulders to HGFC's by sending it back to HGFC for the development of a resolution that would direct LBFC to proceed with a review of the deer program.

As a result, House Resolution (HR) 642 was passed, and returned to Rep. Levdansky and the Budget and Finance Committee – defining the guidelines and questions to be addressed in the audit. However, prior to the Budget and Finance Committee's release of the request for bidders to conduct the audit, Rep. Levdansky ignored the HR 642 directive by first using HR 642 verbatim only as the two introductory sections of the RFP, and secondly by inserting 15 of the 23 questions from his previous "fixed" audit (that both he and Tim Schaeffer of Audubon had presented to Chairman Staback in 2007) as the Scope of Work section in the RFP. Thus, his 2007 predesigned questions that were intended to yield a positive response to the Game Commission's reduce-the-deer program were switched into the audit in place of HR 642. This action virtually nullified the efforts, intentions, and contents of HR 642. In doing so, he likely violated one or more state rules, including House ethics law, violation of the public trust, and/or abuse of power. Rep. Levdansky likely remains at risk of prosecution or legislative reprimand.

Sen. Pippy rejected the bid of Scot Williamson and WMI to conduct the audit because of their previous involvement with the PGC (they were, therefore, not independent), because they were involved with the 1999 conference that led to the dramatic reduction of the deer herd (they were, therefore, not unbiased), and because Sen. Pippy had discovered that Levdansky had slipped his July 26 fraudulent proposal into the audit as its scope of work (the results, therefore, would be "fixed"). Eveland was asked if he could help Sen. Pippy out of this "mess" by bidding on the audit with Eveland's own proposal. Eveland agreed under the stipulation that he would conduct a more thorough investigation than was listed in the LBFC's RFP, because the RFP (which was Levdansky's original audit) was fraudulent. Phil Durgin, as Pippy's representative, agreed to Eveland's request.

Therefore, a second request for proposals (RFP) was released by LBFC, and in addition to WMI's existing bid, two other proposals with bids were received. Eveland's proposal, along with WMI's and one other from Applied Ecological Systems (AES), were given to an independent reviewer by Phil Durgin (Executive Director for LBFC) for comparative purposes. The reviewer determined that Eveland's proposal was "head-and-shoulders" above the other two. However, at the 2008 LBFC bid-selection meeting, WMI was selected by Levdansky and the LBFC staff as being far-and-above the other two proposals.

In 2009, therefore, at a cost of about \$95,000, WMI and Scot Williamson conducted a brief and cursory audit of PGC's deer program by answering 15 of the 23 questions from the original audit-proposal that Rep. Levdansky and Tim Schaeffer of Audubon had presented to (and was rejected by) Rep. Staback back in 2007. Scot Williamson of WMI had been an original supporter and key speaker at the Audubon-sponsored 1999 Harrisburg conference to reduce the deer herd, and was a member of the Deer Management Working Group where he made a 1998 presentation to the PGC BOC regarding deer reduction. Therefore, Rep. David Levdansky was not only successful at assuring that his original fraudulent audit was conducted instead of a legitimate investigation of PGC's deer program, but he also guaranteed the outcome of the audit to be in favor of the PGC's deer program by selecting a biased auditor. Rep. Levdansky's act might be considered to be a misuse of taxpayer dollars.

Therefore, Rep. David Levdansky's attempt to certify PGC's reduce-the-deer program by using a biased auditor to conduct a fraudulent audit has resulted in a misuse of the scientific process and the abuse of scientific integrity. Although the WMI audit attempted to claim that the deer program was sound except for a few minor "tweekings", it exposed the deer program as being without scientific merit.

X. REGARDING REP. DAVID LEVDANSKY'S CONTINUING ROLE AS LEGISLATIVE ENABLER FOR PROMOTING PGC'S FRAUDULENT AUDIT, CERTIFYING PGC'S DEER MANAGEMENT PROGRAM, AND ACHIEVING THE AUDUBON/DCNR ECOSYSTEM MANAGEMENT AGENDA.

Rep. David Levdansky has recently become a member of HGFC, and as such will now have a greater influence on HGFC decisions. He is positioned to possibly succeed Rep. Staback as Chairman.

One week before the February 2010 PGC Board of Commissioners meeting, Rep. Levdansky issued a newspaper article in the Sunday Pittsburgh Post-Gazette informing citizens that the PGC is responsible for the welfare of all nongame species (not just game animals), yet it is funded, so he stated, only by sportsmen dollars – thus setting the stage for State General Funding. About a week later (on the day before the BOC meeting), Rep. Levdansky issued another newspaper article in the Sunday Pittsburgh Post-Gazette claiming that the PGC's current BOC system is antiquated and dysfunctional. (Note that a

similar "dysfunctional BOC" article appeared in the Philadelphia Inquirer at that time, likely indicating an orchestrated effort to promote the ecosystem management agenda.)

It is presumed that these two Levdansky articles were intended to set the stage for near-future State General Funding of the PGC, and thus to achieve Audubon's goal to merge PGC into DCNR. WMI's certification of the deer program was likely intended to temporarily maintain PGC's deer management program intact, while future merger into DCNR would secure the deer reduction program within DCNR (a more friendly agency with Audubon) and, thus, permanently achieve Audubon's ecosystem management agenda.

XI. DEER VERSUS OVENBIRDS AND PEWEES

Audubon, toward achieving its goal for a statewide ecosystem management plan, has co-opted select staff of both DCNR and PGC to sacrifice the statewide deer herd in favor of increasing the biodiversity of nongame birds and mammals, and for the benefit of certain native wildflowers and shrubs. In this regard, PGC had developed a phrase to help in justifying their decision to reduce the deer herd. It has been commonly stated that ***"the PGC is responsible for the wellbeing of 465 species of birds and mammals, not just for deer."*** At first glance, this statement may seem to have substance in justifying their dramatic action. However, a thorough scientific assessment of the state's 465 species of birds and mammals reviewed all groups of birds (which represented almost 400 species) to determine how many of the state's birds would directly benefit from a reduced deer herd. These major taxonomic groups of birds are:

- Loons, Grebes, Pelicans and their Allies
- Waterfowl (Ducks and Geese)
- Raptors (Vultures, Hawks, and Owls)
- Upland Game Birds (Turkey, Grouse, Quail, Pheasant, and Woodcock)
- Herons, Cranes, Shorebirds, and Gulls
- Pigeons and Doves
- Woodpeckers
- Perching Birds (including Flycatchers, Larks, Swallows, Jay and Crows, Chickadees, Titmice, Nuthatch, Creepers, Wrens, Robin, Bluebird, Starling, Vireo, Warblers, Redstart, Sparrows, Mockingbird, Catbird, Thrasher, Cowbird, Orioles, Tanagers, Grosbeak, Finch, Towhee, Ovenbird, Pewee)

The assessment found that the only birds that would likely benefit from a reduced deer herd were grouse, ovenbirds, wood pewees, towhees, and possibly a few other perching birds.

Similarly, all groups of mammals (representing over 70 species) were scientifically assessed to determine how many species would directly benefit from a reduced deer herd. These taxonomic groups of mammals are:

- Opossum, Skunk, Raccoon, Weasel, Porcupine, Fisher
- Small Mammals/Rodents (Shrews, Moles, Bats, Voles, Mice, Woodrats)
- Woodchucks, Chipmunks, Squirrels, Muskrat, Beaver
- Fox, Coyotes, Bobcats
- Cottontail and Showshoe
- Elk
- Bear

It was discovered that only the snowshoe hare would likely experience significant benefit from a reduced deer population.

From a DCNR-sponsored study by the California-based company Scientific Certification Systems, the following list of native wildflowers and shrubs were listed as those benefiting from the reduced deer herd:

baneberry	pink ladyslipper
honeysuckle	tall rattlesnake root
Indian cucumber root	twisted stalk
cohosh	partridge berry
witch hobble	boneset
red trillium	mountain aster
painted trillium	white wood aster
great Solomon's seal	starflower
false Solomon's seal	Canada mayflower
blue cohosh	
cowwheat	
bush honeysuckle	long-leaved holly
bristly sarsaparilla	red elderberry

Therefore, it can be concluded that Pennsylvania's deer herd has been decimated in sacrifice for more grouse, ovenbirds, pewees, snowshoes, pink ladyslippers, trilliums, and a select list of other songbirds and wildflowers.

XII. PRINCIPAL ARCHITECTS OF THE ECOSYSTEM MANAGEMENT (REDUCE-THE-DEER) PROGRAM

Attached is a table which lists the key participants of the ecosystem management/deer reduction program as acknowledged by Audubon, DCNR, and related documents. From this list, only thirteen (13) people emerge as the principal architects of this agenda – those people whose names have been repeatedly documented as promoting a reduction in the state's deer herd. According to documentation, therefore, it is these 13 people who have been the principal architects in the design and orchestration of the PGC's deer management program, and who, along with other key participants, are responsible for the demise of Pennsylvania's deer herd during the past decade. Again, based on Audubon-related documentation, the names of the principal architects include:

(1) Audubon-Related Principal Architects

- Roger Earl Latham: principal author of Audubon's 2005 362-page ecosystem management/reduce the-deer master plan; and co-organizer and report editor of DCNR's 2009 49-page ecosystem management/deer reduction plan.
- Bryon P. Shissler: member of the pre-2000 Deer Management Working Group; a main speaker at Audubon's 1999 Harrisburg conference to reduce the deer herd; member of Audubon's 2005 Deer Management Forum and co-author of Audubon's 362-page ecosystem management/deer reduction master plan; co-organizer of DCNR's 2009 ecosystem management/deer reduction forum; and co-author of the Pinchot Institute's 2009 report toward certifying the PGC's deer management program.

- Marrett D. Grund: member of Audubon's 2005 Deer Management Forum and co-author of Audubon's 362-page ecosystem management/deer reduction master plan; reviewer and conferee of DCNR's 2009 ecosystem management/deer reduction plan and forum; and co-author (with Bryon Shissler) of the Pinchot Institute's 2009 report toward certifying the PGC's deer management program.
- Timothy D. Schaeffer: former Audubon Pennsylvania Executive Director who, along with Rep. David Levdansky, proposed the perceived-to-be-fraudulent 2007 deer audit to Rep. Ed Staback; reviewer of Audubon's 2005 362-page ecosystem management/deer reduction master plan. He is now an executive in the Pennsylvania Fish and Boat Commission.
- Cindy Adams Dunn: member of the pre-2000 Deer Management Working Group; a main speaker at Audubon's 1999 Harrisburg conference to reduce the deer herd; former Audubon Pennsylvania Executive Director; member of Audubon's 2005 Deer Management Forum and co-author of Audubon's 362-page ecosystem management/deer reduction master plan. She is now an executive in DCNR.
- Scot Williamson, Wildlife Management Institute: member of the pre-2000 Deer Management Working Group and 1998 speaker to the PGC's BOC regarding deer herd reduction; a key speaker at Audubon's 1999 Harrisburg conference to reduce the deer herd whose speech was entitled *What can be Done? What is being Done?*; 2009 WMI auditor of the Levdansky deer audit.
- Susan L. Stout, U.S. Forest Service: member of the pre-2000 Deer Management Working Group; key speaker at Audubon's 1999 Harrisburg conference to reduce the deer herd; member of Audubon's 2005 Deer Management Forum and reviewer of Audubon's 362-page ecosystem management/deer reduction master plan; participant in 2-hour television panel discussion promoting PGC's deer reduction program.
- Ben Moyer, Outdoor Writer, Pittsburgh Post-Gazette: member of the pre-2000 Deer Management Working Group; key speaker at Audubon's 1999 Harrisburg conference to reduce the deer herd; member of Audubon's 2005 Deer Management Forum and reviewer of Audubon's 362-page ecosystem management/deer reduction master plan; frequent newspaper columnist supporting PGC's deer reduction program.

(2) DCNR Principal Architect

- Dan Devlin: co-author (along with three employees of The Nature Conservancy) 2004 publication entitled "System Design and Management for Restoring Penn's Woods" – a state master plan for creating a centuries-long-old-growth forest on over 500,000 acres of Pennsylvania state forests through the drastic and permanent reduction of the deer herd; the sponsor of DCNR's 2009 ecosystem management/DMA deer reduction forum and corresponding 49-page report.

(3) PGC Principal Architects

- Calvin W. DuBrock: key speaker at Audubon's 1999 Harrisburg conference to reduce the deer herd; acknowledged by Audubon as a participant of Audubon's 2005 Deer Management Forum and in Audubon's 362-page ecosystem management/deer reduction master plan; Gary Alt's direct supervisor; Christopher Rosenberry's direct supervisor; Chief of the Game Commission's

Wildlife Research and Management Division who is responsible for the PGC's deer reduction program.

- Gary Alt: keynote (dinner) speaker at Audubon's 1999 Harrisburg conference to reduce the deer herd; principal designer and public promoter of the PGC's deer reduction program; acknowledged in Audubon's 2005 362-page ecosystem management/deer reduction strategic plan as key to the success of their deer reduction agenda.
- Christopher S. Rosenberry: acknowledged as a participant of Audubon's 2005 Deer Management Forum and acknowledged as a participant in Audubon's 362-page ecosystem management/deer reduction master plan; principal member of DCNR's 2009 ecosystem management/deer reduction forum and co-author of the associated 49-page report; current director of the PGC deer reduction program.

(4) Legislative Facilitator/Audubon Agent

- Rep. David K. Levdansky (D-39), Elizabeth: co-sponsor with Timothy Schaeffer, former Audubon Pennsylvania Executive Director, of the perceived-fraudulent 2007 deer audit; responsible for awarding this predesigned audit to Scot Williamson of WMI; advocate of the elimination of the PGC's Board of Commissioners.

XIII. SUMMARY

In summary, the previous considerations indicate that the PGC initiated their reduce-the-deer program as a means of achieving the ecosystem management agenda of Audubon, The Nature Conservancy, and DCNR. A few years after the fact, PGC formulated three goals (healthy deer, healthy forests, and reduce deer/human conflicts) toward assuaging sportsmen, legislators, and citizens and convincing them that such a drastic and permanent action was based on sound science, in the best interest of sportsmen and the resource, and, therefore, necessary. Gary Alt was used to convince sportsmen that it was in their best interest to reduce the herd – abusing his credibility with sportsmen as likely the only person in the state whom they would believe and entrust with their most important resource. In retrospect, the collection of scientific data during the past decade indicates that both the health of deer and of the forest have not improved following the demise of the herd, and that both the herd and the forest were never in poor health.

XIV. CONCLUSION

In conclusion, the PGC decision to reduce the deer herd was not based on sound science, but, instead, on achieving Audubon's ecosystem management agenda.

Currently, DCNR and the PGC are seeking the same objective: to achieve DCNR's ecosystem management goals by permanently reducing the deer herd. DCNR's long-term plan is:

- to change their long-held management philosophy from maximum sustained silvicultural and wildlife management to ecosystems management – promoting a dense and diverse herbaceous and woody forest understory rich in native wildflowers and nongame wildlife.

- to turn ¼ to ½ of state forest lands (550,000 to 1,000,000 acres) into 300-400 year-old old-growth forests.

The principal tool toward accomplishing DCNR's two goals is the dramatic and permanent reduction of the commonwealth's deer herd. DCNR cannot achieve this goal without the cooperation of the PGC, which has employed the new deer management program using increased antlerless permits, DMAP, and sportsmen as the tools to accomplish DCNR's goals. PGC has been the willing partner in achieving this agenda. It is the wish of Audubon, DCNR, and Rep. Levdansky to abolish the Game Commission by merging it, along with the Fish and Boat Commission, into DCNR – because DCNR is a "more friendly player" with Audubon.

Therefore:

- **The PGC's deer management program is not designed to manage deer in the best interest of sportsmen.**
- **It is, instead, designed as a forest management tool which uses manipulation of the deer herd to accomplish DCNR's goal.**
- **DCNR's goal was designed by Audubon and The Nature Conservancy.**

NOTE: This new ecosystem management/deer reduction agenda that is being promoted by Audubon, the Nature Conservancy, select staff of DCNR and PGC, and Rep. David Levdansky, has been temporarily stalled by the bold decisions in the deer program that were made by the PGC's Board of Commissioners at their February and April 2010 meetings. If you oppose the Game Commission's deer reduction program, then it is important for you to contact members of the PGC's 8-member Board of Commissioners and encourage them to take appropriate measures toward correcting the problem and increasing the commonwealth's deer population.

It should be understood that the Pennsylvania Department of Conservation and Natural Resources and the Pennsylvania Game Commission, as agencies, should not be held fully responsible for the deer management program of the last decade. These are time-tested agencies that have served both the citizens and natural resources of the commonwealth with competence and distinction. Their missions, as they have been charged, are to represent the best interests of both the natural resources and the citizenry of the commonwealth, and they remain vital state agencies in this pursuit. Instead, the dramatic reduction of Pennsylvania's deer herd has been designed and perpetrated by only a few influential individuals within these agencies who are disserving the state's people, misrepresenting their agencies, and mismanaging the resource – Pennsylvania's state mammal, white-tailed deer.

Remember, although Audubon may have noble ideals, the PGC is not an arm of Audubon. This agency was chartered as the Pennsylvania Game Commission, not Trilliums-R-Us. Some current members swore an oath to protect first the resource, and secondly the sportsman. The Commissioners must now decide what is the resource that they have sworn to protect – wildlife or wildflowers?

ECOSYSTEM MANAGEMENT / DEER REDUCTION TEAM

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- Timothy D. Schaeffer, Co-Leader (Now PFBC)
- Cindy Adams Dunn (Now DCNR)
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- Ann Fowler Rhoads
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- Dan Devlin, Forum Sponsor
- Roy Brubaker, Forum Organizer
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