



MISSISSIPPI HUNTING DOG ASSOCIATION, INC.

Review of the University of Georgia Report on Deer Hunting with Dogs:

Evaluating Dog-hunting for White-tailed Deer: Dog Movements, Deer Movements, and the Potential Suitability of National Forest Lands for Dog-hunting in Mississippi

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The National Forests in Mississippi Executive Summary

September 28, 2019

Background:

On September 25, 2019, the Mississippi Hunting Dog Association was provided a copy of the University of Georgia Report on Deer Dog Hunting and the National Forests in Mississippi Executive Summary. For the purposes of this review, the University of Georgia Report on Deer Hunting with Dogs will be referred to as “report”, the executive summary provided by National Forests in Mississippi will be referred to as “executive summary” and deer hunting with dogs will be referred to as “dog-deer”.

Review Comments:

- 1) It is important to note that the report was not a new study on dog-deer hunting or dog-deer hunting in Mississippi, but a review of preexisting literature involving deer movements and dog-deer hunting. Based on selected information, the authors of the report attempted to overlay potential deer movements onto maps of Mississippi National Forests to determine areas suitable to dog-deer hunting.
- 2) **On at least thirteen occasions, the report acknowledged that there was insufficient data involving deer movements or dog-deer hunting and/or conclusions were based on estimates or assumptions.**
 - a. “It should be noted that **no studies** were designed specifically to assess intricate behaviors of deer chased by dogs in relation to property boundaries. (Page 2)
 - b. “...this review aims to summarize findings of previous research which are relevant to extrapolating how dog-hunting **might** impact deer movements outside of deer home range.” (Page 2)
 - c. “We will define **reasonable** ranges of values for... changes in deer movements in response to hunting with dogs.” (Page 3)
 - d. There is **no information** in the primary literature about deer movements relative to dog-hunting as it is practiced on public lands today, regulation of dog hunting within the broader framework of deer population management, and management of dog-hunting to minimize conflicts with other hunters and landowners adjacent to public dog-hunting areas. (Page 3)
 - e. “There is **limited information** in the primary literature concerning movement of deer relative to dog-hunting.” (Page 9)
 - f. “The sizes, configurations, and arrangements of deer home ranges on the landscape are **unknown** for most areas of the southeastern U.S.” (Page 10)

- 9) The report states that the “movement behaviors of deer exposed to hunting with dogs appeared to be similar to their responses to hunting by humans and deer-initiated excursions.” (Page 9). It is important to note that the comparative data referenced for deer-initiated excursions comes from studies that took place in Delaware, Maryland, and Pennsylvania (Pages 7-8). **Per the comparison of deer movements to hunting with dogs, the report concludes that “given their unpredictable nature and short duration, it would be impractical to adjust management of hunting to account for these relatively long distance movements”** (Page 10) when analyzing movements of deer outside of their home range in response to “hunting and during deer initiated excursions.” (Page 10)
- 10) An exercise was performed “to investigate the **potential** movements of deer in response to dog-hunting in the study area.” (Page 10) It was presumed that the study area was each National Forest in Mississippi as maps were generated for each National Forest. It is also important to note that only estimated data was used in this exercise based on the following statement: “We believe that applying a **range estimate... is reasonable to capture the variability among the individual deer since no data were available for the study area.**” (Pages 10-11) This is very important because this exercise, which conclusions were based on estimated data, is referenced in the Executive Summary: “UGA identified relatively few contiguous areas in which dogs would likely remain contained on Forest Service land.”
- 11) The details of the exercise are further explained on Page 55 of the report. Buffer distances required to contain 50, 70, and 90% of deer-dog hunts were determined by first calculating “**a probability distribution of expected distances white-tailed deer would travel during dog-deer hunts based on parameters from our literature review (Table 1).**” (Page 55). It is important to note that Table 1 is titled “Movements of white-tailed deer relative to hunting by humans without dogs.” It is assumed that the author meant to reference Table 2 which is titled “Movements of white-tailed deer relative to hunting with dogs.” (Page 22) If that is indeed the case, this utilization of the table is flawed for the reasons stated in comments #4 - #8 above.
- 12) The purpose of the exercise was to determine and map areas of the National Forests in Mississippi that would be large enough to dog-deer hunt. The exercise focused on determining containment thresholds for each national forest based on the distance to the “nearest non-Forest Service property.” (Page 56) “The areas available to conduct dog-hunts on most national forests properties in Mississippi were relatively minimal (Table 2) given the parameters used in our exercise.” (Page 56) Attempts to adjust management of dog-deer hunting on the results of this exercise would be misguided for the following reasons:
- The report indicates that the exercise was based on estimated or missing data (see Comment #10) and the following statement: “We calculated this hunt distance distribution as the joint distribution that resulted from randomly sampling our **assumed distributions** of deer home ranges, the **probability** of a deer exiting its home range during a hunt, distances travelled upon exiting a home range, and the sex ratio of the population.” Page 55
 - The exercise uses the “nearest non-Forest Service Property” (Page 56) as a discriminating variable. This variable does not consider that **the nearest non-Forest Service Property may be owned by dog-deer hunters, leased by dog-deer hunters, or owned/leased by individuals that are indifferent to dog-deer hunting.**
 - The report indicates that the results of the simulations are “**liberal estimates**” (Page 57)

- 13) In summary of various interviews with personnel from Florida, the report noted and the executive summary restated that “Sufficient spatial separation of dog-hunting activities, including dogs, vehicles, and hunters, from in-holdings, adjacent properties, sensitive areas, and still-hunt areas is key to successfully implementing dog-hunting even when correction collars are required.” (Page 90) What is not stated is that the National Forests of Mississippi are public lands that should be equally available to all users. This statement stops short of suggesting its ok to use all of the open public land adjacent to private land to hunt as long as you’re not a dog-deer hunter. It also does not take into consideration that the in-holdings may be owned by dog-deer hunters, leased by dog-deer hunters, or owned/leased by individuals that are indifferent to dog-deer hunting.
- 14) The report stated that “Roads allow hunters to effectively maneuver in their vehicles and maintain contact with their dogs.” (Page 87) It is important to note that as a result of the implementation of the Travel Management Rule in and around 2010-2012, various forest service roads were closed and blocked to vehicular traffic throughout the National Forests of Mississippi. Since that time, the Mississippi Hunting Dog Association has on multiple occasions presented the opening of closed roads as a viable option to assist with any potential conflicts involving deer hunting with dogs. To date, no roads have been reopened.
- 15) Even though this entire report was an effort to evaluate dog-deer hunting, **not a single dog-deer hunter was interviewed nor was a dog-deer hunt attended by the authors of the report.** Even though dog-deer hunters were not interviewed, the opinions of an individual that was obviously against dog-deer hunting and “government agencies which institute dog-hunting without sufficiently regulating and enforcing trespass issues” was included on Pages 88-89.
- 16) The USFS executive summary indicated that “over the last several years, we have seen an increase in the amount of and the seriousness of complaints related to private property trespass by deer hunting dogs.” In 2017, the Mississippi Hunting Dog Association filed a FOIA request (File code 6270 2018-FS-R8-01109-F) specifically asking for complaint data involving dog-deer hunting for fiscal years 2014 -2016. In response, the following statement was provided and the request was closed: “Forest Service has determined that your request do[sic] not specifically identify any records.”
- 17) While the report focused on opinions of interviewees and estimated or missing data, **the report and the executive summary failed to acknowledge and/or analyze the only dog-deer hunting violation data that exists for dog-deer hunting in Mississippi.** The following data was obtained from the MDWFP Annual Deer Report from 2017-2018:

“Homochitto Dog Law” Violations							
10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18
1	8	4	8	11	2	5	9

Over eight dog-deer seasons, an average of only six tickets per year was issued for violation of the “Homochitto Dog Law. It is important to note in the Homochitto National Forest, a permit is required to be obtained for all hunting dogs from November 1st – January 31st which is a total of 92 days. A violation of the “Homochitto Dog Law” could be a dog traveling onto private property, a permit not being obtained, the permit number not being displayed as required, etc. Of these 92 days, 39 days are during dog-deer hunting seasons. In information obtained by a 2014 FOIA request, the total numbers of permits issued for the 2010-2011, 2011-2012, 2012-2013, and 2013-2014 seasons were 816, 654, 653, and 642 respectively. No data on the number of permit holders has been requested for 2014-2018:

Analysis of "Homochitto Dog Law" Violations								
Season	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18
Violations	1	8	4	8	11	2	5	9
Violations Per Day Per Permit Period (92 days)	.01	.09	.04	.09	.12	.02	.05	.10
Violations Per Dog-Deer Hunting Season Day (39 days)*	.03	.21	.10	.21	.28	.05	.13	.23
# Permit Holders	816	654	653	642	-	-	-	-
% of Permit Holders Ticketed	0.1%	1.2%	0.6%	1.2%	-	-	-	-

* This calculation was based on 39 days which citations may or may not have been written during the dog-deer hunting seasons.

Conclusion:

While no regulatory proposals have been generated from the information contained within the report at this time, it would not be appropriate to offer a position on any specific recommendation or opinion of the report. With that being said, it is of particular concern that the data used within the report appeared to be out of date, insufficient, missing, or estimated. It is also important to note that this was a report about dog-deer hunting and not one dog-deer hunter was interviewed. In addition, there were no dog-deer hunts attended or any studies on the usage of GPS/Corrective collars. There was no emphasis or discussion of any dogs within the report other than deer dogs. It is understood that the report was focused on dog-deer hunting, but it is not understood what the rationale is to not include other hunting dogs when potentially considering additional regulatory requirements as that is a constant theme when discussing this issue. Is it that there is a mindset these other dogs can't or don't travel onto private property? If so, that is not the case. What about someone's yard dog that travels through the National Forest onto private property? Perhaps the issue has never been about deer dogs on private property as much as it has been the 'ownership' of the deer. It would be reasonable to expect the violations of the Homochitto Dog Law would be greater if all of the dog-deer hunting complaints for dogs trespassing onto private property were valid. Since the complaint data does not appear to be captured anywhere, it is unclear what process, if any, is in place to validate such complaints.