

# **AN INDEPENDENT SCIENTIFIC INVESTIGATION OF THE PENNSYLVANIA GAME COMMISSION'S DEER REDUCTION PROGRAM**

**A FOUR-PART SERIES WHICH DOCUMENTS THE REASON BEHIND  
THE DEER REDUCTION PROGRAM, HOW IT WAS ACHIEVED,  
AND WHO WAS INVOLVED.**

- **Part I. The Relationship Between Green Certification  
and Deer Reduction**
- **Part II. DCNR's Deer Management Plan for Achieving  
Green Certification**
- **Part III. Impact of the Deer Management Working Group**
- **Part IV. Efforts to Validate the Deer Reduction Program**

**December 2, 2010**

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## EXECUTIVE SUMMARY

This four-part series describes in detail why the PGC's deer reduction program was concocted, how it was achieved, and who are the responsible parties.

**Part I: The Relationship Between Green Certification and Deer Reduction.** In 1996, Bryon Shissler (an independent wildlife biologist, and occasional consultant to Audubon, DCNR, and the PGC who has spent much of his career in the pursuit of culling the deer herd) convinced DCNR's Bureau of Forestry to conduct a one-year pilot study toward evaluating the benefits of DCNR's enrollment in a Green Certification program. The program was founded in 1993 by the newly-formed Forest Stewardship Council (FSC) of Bonn, Germany, which by 1995 had established branches in many nations toward promoting "*forest stewardship*". By 1996, FSC had certified Scientific Certification Systems (a California-based organization) to begin enrolling state and private forest managers into the Green Certification program. SCS, in turn, had certified Bryon Shissler as their eastern representative for the program.

DCNR represented the first potential enrollee into the program – "*a case study for the rest of the nation*". At the end of the DCNR review period in late 1996, Shissler convened a workshop in Harrisburg that was attended by DCNR foresters (Jim Grace and Dan Devlin), state forest managers from other states, and managers of private forest lands toward enrolling DCNR, and hopefully expanding enrollment to include other states as well as private landholders in Pennsylvania. Other state agencies soon realized the shortcomings of the program, and "*elected not to pursue FSC certification*". These other state agencies declined to enroll because "*criteria are too value-laden, not based on current forest science*". When a large private landowner asked how certified wood might be kept separate from noncertified lumber at the mill, Shissler responded that this problem would be worked out. DCNR, however, enrolled in the program.

The benefit to DCNR was financial. Once certified by SCS, DCNR was able to advertise and market lumber from state forestlands as being Green Certified by FSC, and to apply the "*green*" label to its wood products. As stated by DCNR, retailers such as The Home Depot and its customers would be more apt to buy certified wood products: "*Look for the certified stamp next time you are shopping for wood.*"

The benefit to Shissler and the certifier (SCS) was also financial – Green Certification could be very lucrative as other state agencies and private landowners enrolled. In addition, Shissler could realize a second benefit – advancing his personal agenda to cull Pennsylvania's deer herd.

As the process unfolded, in order to achieve Green Certification, and to be annually recertified, a forest management criterion had to be selected on which to annually rate DCNR. Although any number of forest practices (such as improved logging operations, a remediation plan to reduce the effects of acid rain on the forest, a forest fire suppression plan, or statewide wildlife habitat enhancement practices) could have been selected; Shissler chose deer reduction as the gauge to measure DCNR's adherence to sound forest stewardship. DCNR accepted the arrangement.

Shissler was also assigned as the annual auditor, the person who would review DCNR's annual success at further reducing the deer herd across its 2.1 million acres of state forest lands, and who would determine if DCNR should be annually recertified. Gary Alt stated that "*DCNR has a gun to*

*its head with Green Certification.*" SCS in California simply served as the Green Certification rubber-stamper at the recommendation of Shissler.

Herein, it should be noted that Green Certified wood is no different than other wood that is harvested on private or public lands – a 100-year-old cherry log from a certified state forest is no different than a private landowner's noncertified 100-year-old cherry log. Furthermore, within the past year a small family-owned sawmill reported that they were approached by a "green certifier" who attempted to enroll them in the program. For about \$6,000, he offered to enroll their lumber mill, with no forest management criteria required – just payment to the certifier. The owners were told that if they were certified, they could claim that their wood was certified and recycled, even if it was not. The certifier stated that he was not an "*environmentalist*", but, instead, and "*environmental opportunist*." Unlike DCNR, these private landowners chose not to enroll because it was "*too expensive*", and because they recognized it as "*a scam*".

In 1996, DCNR could not participate in the Green Certification program without the cooperation of PGC, because DCNR does not have the authority to regulate hunting seasons and deer reduction. By 1998, the PGC had complied with DCNR's need.

**Part II: DCNR's Deer Management Plan for Green Certification.** To comply with Shissler's requirement to achieve Green Certification through deer reduction, DCNR prepared an official Deer Management Plan. In it, the PGC was identified as assisting DCNR in the Green Certification program by using drastic measures to reduce the deer herd. Quoting from DCNR's Deer Management Plan:

*"The Pennsylvania Game Commission has begun to implement a variety of measures designed to bring the deer herd into balance with their natural habitats. In 1998, a Deer Management Section was created (with)...supervisor Dr. Gary Alt..."*

*"The first major change to Pennsylvania deer management after the creation of the Deer Management Section was the switch from a two-week buck-only rifle season and a three-day antlerless rifle season to a concurrent two-week buck and antlerless rifle season. This was a tremendous step forward..."* "Other changes include the gradual increase in antlerless permits in most areas of the state, switching from counties to ecologically based Wildlife Management Units, a one-week early muzzleloader antlerless deer season, a 3-day early antlerless rifle season for Junior and Senior hunters, and more restrictive buck antler requirements...**All of these initiatives have been successful tools for increasing the antlerless deer harvest.**"

For those who believe that antler restrictions were designed in the best interest of sportsmen, DCNR leaves no doubt that antler restrictions were concocted with a dual purpose: (1) so that Gary Alt could sell the deer-reduction plan to sportsmen by offering them bigger antlers as a "*carrot*", and (2) to frustrate hunters who were not seeing legal buck to refocus their attentions on doe, and thereby to more quickly reduce the herd. This is documented by DCNR in its Deer Management Plan, which is quoted as stating: "*Increased restrictions for antlered bucks made it harder to harvest a buck so hunters were more apt to harvest an antlerless deer instead.*"

DCNR recognized DMAP as another tool to reduce the herd, and lamented that, "*Despite all these advances (by PGC) and record harvest levels of antlerless deer, the statewide deer population has not been documented to be reduced, although progress has likely been made in some areas.*" Therefore, DCNR (and Shissler and SCS) recommended additional measures in DCNR's Deer

Management Plan to reduce the deer herd, including the use of bait, night hunting, semi-automatic rifles, and dogs. They stated, "*It is expected that implementing most of these tools will require the review and approval of the Pennsylvania Game Commission.*"

**Part III: Impact of the Deer Management Working Group.** The PGC responded to DCNR's need by initiating two actions. First, PGC (Cal DuBrock) created the Deer Management Section within the agency, and appointed Gary Alt as the new director. Secondly, the PGC established the Deer Management Working Group (DMWG) in 1998 to review the existing program and provide recommendations regarding the creation of a new statewide deer management program. Scot Williamson (a representative of the Wildlife Management Institute (WMI)) was selected by the PGC as the group's chairman.

Although it was cited that members of the DMWG were chosen to represent a diversity of special interests (including hunters), in addition to Scot Williamson, the DMWG included not only Bryon Shissler, but others such as Cindy Dunn (Audubon), Susan Stout, and Ben Moyer who were adamant supporters of deer reduction, and who have remained long-term leaders of the deer reduction program.

In January 2000, Chairman Scot Williamson presented his "*Findings and Recommendations of the Deer Management Working Group to the Executive Director and Board of Commissioners Pennsylvania Game Commission.*" Virtually every facet to today's deer management program was recommended by Scot Williamson. He recommended the elimination of the county-based management system in favor of Wildlife Management Units, aggressive doe harvesting using increased antlerless allocations, aggressive hot spot harvesting (DMAP), the concurrent buck/doe season, and other doe harvest methods. Therefore, Scot Williamson, whether alone or in concert with Bryon Shissler, Calvin DuBrock, and Gary Alt, had been the designer and author of what would soon become the PGC's new deer-reduction program.

The DMWG was intended to give the perception that PGC was not responsible for the deer reduction program, but that it was the legitimate result of a diversity of interests. This initiative was concocted by the PGC, therefore, to provide justification for their about-to-be-announced new deer reduction program, which had been designed to comply with DCNR's need for achieving and maintaining Green Certification.

**Part IV: Efforts to Validate the Deer Reduction Program.** Beginning with the Deer Management Working Group, 15 separate efforts have been documented toward validating the deer reduction program. For the most part, these initiatives resulted when agenda-driven organizations such as Audubon Pennsylvania saw the opportunity to advance their agendas by capitalizing on deer reduction. Audubon (Cindy Dunn, Executive Director) sponsored a 1999 reduce-the-deer conference in Harrisburg, at which the main speakers were Bryon Shissler, Susan Stout, Calvin DuBrock, Scot Williamson, and Ben Moyer. The keynote speaker was Gary Alt.

Alt conducted an exhaustive statewide tour toward convincing sportsmen that deer reduction was in their best interest, that it would only reduce the herd by about 25%, and that it was temporary. Sportsmen trusted Alt, and it is unlikely that they would have entrusted the wellbeing of their most valued resource (white-tailed deer) with anyone except Alt. DuBrock and the PGC knew this, and abused this respect.

From 2001-2004, Audubon conducted a Deer Management Forum and wrote a 362-page master plan toward promoting their concept of ecosystem management and enhanced biodiversity –

achieved through deer reduction. Authors included Cindy Dunn and Bryon Shissler, with Ben Moyer, Timothy Schaeffer, and Susan Stout serving as reviewers. Audubon acknowledged those who had assisted, stating, "*We are grateful to those...Robert C. Boyd, Calvin W. DuBrock, Chris Rosenberry, and Vernon R. Ross, Pennsylvania Game Commission*". In the report, Audubon called for increased deer reduction, and the merger of PGC (along with the Fish and Boat Commission) into DCNR in order to facilitate deer reduction, considering that DCNR was a more friendly and aggressive player with Audubon regarding deer reduction.

In 2004, The Nature Conservancy and Dan Devlin of DCNR partnered in a plan to create a 500,000-1,000,000 acre system of old growth forests in Pennsylvania. This 300-400 year-old forest system would be second in size only to New York's Adirondack State Park, and would be achieved through reduction of the commonwealth's deer herd.

By 2005, Bryon Shissler, Gary Alt, Tim Schaeffer, and Ben Moyer had organized their Ecosystem Management Project – a series of newsletters and lectures with its stated goal being: "*to assist state agencies and hunters in their goal of balancing the number of deer with their natural habitats...*" Shissler gave testimony to the State Legislature on the need to reduce the deer herd, stating that sportsmen and the PGC were "*not bad people but a flawed system*".

In 2006, DCNR conducted a statewide assessment of deer browsing on forest tree regeneration. This report concluded that deer numbers had not been reduced far enough or long enough. However, inspection of the data in the report indicated that 89% of forest regeneration was experiencing no browsing up to moderate browsing, and that only 4% of forest regeneration was classified as severely browsed. This study, therefore, documented that the forest had not been in poor health – on the contrary.

In 2007, a two-hour TV-aired panel discussion in Coudersport was anchored by members of PGC, DCNR, and Susan Stout. She suggested that those northern-tier businesses which are facing bankruptcy because of the reduced deer herd and the resulting decline of hunters to support them, should refocus their marketing from deer hunters to family programs to count animal droppings. The PGC representative suggested that deer hunters refocus their attentions on squirrels, because squirrel populations were high.

DCNR's Dan Devlin held a forum in 2009 entitled "*Monitoring Deer Effects on Forest Ecosystems in Pennsylvania State Forests*." In step with Audubon, his 49-page report outlined changing from the traditional style of wildlife and forest management called "*maximum sustained yield*", to Audubon's new "*ecosystem management*" philosophy. This plan was to be achieved through long-term deer reduction. Authors included Christopher Rosenberry and Bryon Shissler. Also in 2009, Shissler published a report for which he had gained funding through the Pinchot Institute, claiming that the PGC was the most enlightened of the various state game management agencies because the PGC had changed from the archaic "*agricultural paradigm*" (maximum sustained yield) of wildlife management to ecosystem management.

Perhaps the most significant effort to validate the PGC's deer reduction program occurred from 2007-2009 when former State Representative David Levdansky successfully conducted a fraudulent audit of the PGC's deer reduction program. This audit had been written by the leaders of the deer reduction team and presented 23 questions which were designed to yield a positive response in favor of the PGC's deer reduction program. Therefore, this audit was designed to deceive sportsmen, state legislators, and the 8-member PGC Board of Commissioners into believing that the

audit was a legitimate assessment of the deer reduction program. To compound the fraud, Rep. Levdansky hired Scot Williamson of the Wildlife Management Institute (WMI) to conduct the audit. This is the same Scot Williamson who in 1998-2000 had designed virtually every aspect of the PGC's deer reduction program as Chairman of the Deer Management Working Group (DMWG). Williamson had also been a principal speaker at Audubon's 1999 Harrisburg conference to reduce the deer herd. Therefore, Rep. Levdansky had not only used \$95,000 of taxpayer money to conduct a fraudulent audit, but he had hired the creator of the deer program as the auditor – a flagrant conflict of interest. This circumstance likely represents a violation of state law, including violation of the public trust, abuse of power, or waste of taxpayer dollars. Others will be left to make that decision.

**In Conclusion.** The PGC's deer management program is not based on science, and not based on the best interests of sportsmen, the forest, the deer herd, or even the PGC itself. It was instead concocted to assist DCNR in its desire to gain and maintain Green Certification, and secondarily to advance the ecosystem management agenda of Audubon and their like-minded associates.

The deer reduction program was founded and orchestrated by only a handful of people, whose goals were "*money*" and "*agenda*". This small group of ideologues continue, today, to convince and intimidate decision makers to stay the course. They have been successful at not only collapsing Pennsylvania's deer herd and the virtual elimination of the principal herbivore from Pennsylvania's natural ecosystem, but in destroying one of the nation's top deer-hunting programs.

The impacts to sportsmen and the tradition of hunting have been dramatic, with the sale of general hunting licenses declining from a high of 1.4 million to 775,000. The ranks of youth hunters has declined by 10% within the past decade. Although a specific socioeconomic study has not yet been conducted, the jobs and economic impact to the citizens of the commonwealth could be measured annually in the hundreds of millions of dollars – or more. As the number of sportsmen decline, so rises the risk to our Second Amendment Right to keep and bear arms, and so increases the jeopardy to the PGC itself to maintain its financial solvency and avoid merger into DCNR.

What have we permitted to happen to the commonwealth? What have we done?

## INTRODUCTION

In 2000, the Pennsylvania Game Commission (PGC) initiated a new deer management program. At that time, Gary Alt, who had recently been assigned to head the newly-created Deer Management Section, began an exhaustive statewide effort to convince sportsmen that a modest and temporary reduction of the deer herd was in their best interest, and that herd numbers would be gradually returned as forest regeneration increased. This, however, was a ruse.

The PGC began a permanent deer reduction campaign that has collapsed the herd in many parts of the state, with no intention of returning the deer population to a respectably huntable status. It is estimated that deer density has been reduced by 50-75% in many areas of the state. PGC information indicates that in some northern-tier areas the herd has been decimated to only 1-2 deer per square mile. Given the presence of large predators such as bears and coyotes, this low herd density likely represents an unsustainable population even without further hunting.

The PGC, therefore, is systematically removing the principal herbivore from the Pennsylvania ecosystem. This action will certainly result in significant negative biological impacts to natural systems, and already has had dramatic negative socioeconomic effects to the citizens of the commonwealth.

Although there have been many attempts to justify herd reduction – such as to improve the health of deer, to improve the health of the forest, and to increase biodiversity – independent scientific analysis has indicated that these goals have little scientific credibility. Using data from studies that were conducted by PGC and the Pennsylvania Department of Conservation and Natural Resources (DCNR), the health of deer is not at issue, with deer in each of the PGC's Wildlife Management Units throughout the state being not in poor health, but, instead, in good health. Study results also indicate that only 4% of forest regeneration is being severely browsed throughout the 2.1 million acres of state forest lands, with 89% of regenerating forest tree seedlings receiving only a small amount of browsing or no browsing at all.

For those in Audubon, DCNR, and the PGC who justify herd reduction toward improving forest biodiversity, this, too, is a scientific fallacy. Whereas the stated goal of Audubon and its allies is to increase the numbers of nongame birds and mammals as well as the densities of native wildflowers and shrubs, biodiversity, in contrast, refers to the degree of variation of life forms within a given ecosystem. Biodiversity, therefore, is affected by the extinction of plants and animal, and the use of the term by Audubon, DCNR, and PGC is, herein, made in error. The goal of proponents of deer reduction is not to return extinct species to the commonwealth, but simply to increase the population densities of species which already exist in Pennsylvania forests – nongame birds and mammals which might increase in numbers if deer were greatly reduced or removed from the ecosystem. Of the 465 species of birds and mammals in Pennsylvania, the only ones that might experience a significant increase in numbers as a result of deer reduction are grouse, ovenbirds, pewees, towhees, snowshoe hares, and possibly a few other low-nesting songbirds. Therefore, the reader is asked if the decimation of Pennsylvania's deer herd can be justified -- sacrificed to possibly improve the numbers of this handful of other birds and mammals? If "science" is, therefore, not a justification to decimate the herd, then why was the herd reduced?

This document represents a four-year independent investigation into the reason, or reasons, behind the PGC's deer reduction program. Revealed is, why the deer reduction program was concocted, how it was achieved, and who were the responsible parties. The material is presented in four separate parts, and will enlighten readers that the old adage "follow the money" has again proven to be the overriding motivation behind the mismanagement and destruction of Pennsylvania's deer herd.

# THE RELATIONSHIP BETWEEN GREEN CERTIFICATION AND DEER REDUCTION

By John Eveland  
October 4, 2010

**Preface.** This document is part one of a four-part series that describes "How Deer Reduction Was Achieved". The series consists of:

- Part I. The Relationship Between Green Certification and Deer Reduction
- Part II. DCNR's Deer Management Plan for Achieving Green Certification
- Part III. Impact of the Deer Management Working Group
- Part IV. Efforts to Validate the Deer Reduction Program

As is the case with this Part I in the series, Parts II through IV will be presented as separate documents.

**Introduction.** Some time ago I acquired a green certification report regarding forest management of Pennsylvania's state forest lands. Acquired from DCNR, the report was devoid of the cover and introductory pages, and began with the text portion of the document. This lengthy and biologically-technical report identified Scientific Certification Systems (SCS) as the responsible organization. To achieve Green Certification, the report emphasized the need for DCNR to reduce the deer herd. As an example, DMAP was mentioned 10 times in one paragraph on the first page.

Suspecting that such a Pennsylvania-specific technical document could not have been produced by this California group, and suspicious of the author considering that its deer-reduction agenda paralleled Audubon's and the handful of promoters of PGC's deer-reduction program, I located SCS in California, called them, and asked who was the actual author – had it been a Pennsylvania-based author? Not surprisingly, they refused to answer this question.

Subsequently, a former Penn State employee provided me with a document that held the answer – a January 15, 1998 Pinchot Institute document that was written by Bryon Shissler. The document described a Harrisburg workshop that Shissler held, designed to bring DCNR and other states into the Green Certification program. It identified Shissler as the author of the above-mentioned coverless SCS Green-Certification report. The 1997 workshop was well attended by a variety of government agencies, organizations, and private parties from Pennsylvania and other states. Several other Green Certification and related documents describe the process.

**Description.** Green Certification is a qualitative process that first involves the design of a forest management goal, with certification simply being achieved if the forest is managed in a way that complies with the plan. In Pennsylvania's case, the forest management goal was arbitrarily chosen to be deer reduction. Once the auditor verifies that the goal (deer reduction) is being achieved, the harvested wood is then marked as "green certified". However, it should be noted that such wood is no different than any other wood that is harvested on private or public lands – a 100-year-old cherry log from a certified state forest is no different than a private landowner's noncertified 100-year-old

cherry log. It makes no difference if the land on which it was grown sported deer or not – had a dense undercover with pink ladyslippers or not.

In Pennsylvania's case, Green Certification was a pilot process in 1996-98 – "a case study for the rest of the nation"-- that was developed in concert between Shissler and DCNR (James Grace and Dan Devlin), and required "dramatic deer reduction" in order to enhance forest understory and biodiversity. As the process proceeds, a consultant conducts on-site audits to determine if the forest management goal (deer reduction) is being achieved -- in Pennsylvania's case, the consultant and audit team leader was Bryon Shissler and his company, Natural Resource Consultants (NRC). Later, Gary Alt became a member of the NRC team. To remove the air of conflict of interest, and to provide a semblance of credibility, a Forest Stewardship Council-accredited organization (such as Scientific Certification Systems (SCS) in Oakland, California, or SmartWood (another FSC-accredited certifier)) is employed to rubber-stamp the certification. During the 1998 pilot-year certification for DCNR, while Bryon Shissler served as team leader, the SCS "author" of the document visited Pennsylvania for only six days.

Quoting from an FSC document regarding its history:

*"..following the 1992 Earth Summit in Rio, world attention was focused on the challenges faced by cultures around the globe...The challenges at Rio remain largely unmet. However, the conversations that occurred there contributed to one solution – the Forest Stewardship Council (FSC)..formed in 1993. The FSC's national headquarters are located in Bonn, Germany, with national offices in more than 40 countries. In 1995, FSC-US, located in Minneapolis, MN, was established as the national "chapter" of FSC. Like the forestry profession itself, the FSC system includes stakeholders with a diverse array of perspectives on what represents a well-managed and sustainable forest. It's purpose is...to work with certification organizations to promote FSC certification in the U.S.."* DCNR stated that SCS is one of only five certification organizations in the world.

To reiterate, FSC nationally certified select companies such as SCS and SmartWood, who then rubber-stamp state certifications based on audits that were conducted by local consultants such as Bryon Shissler. Shissler (through his company Natural Resource Consultants (NRC) and the influence of his associates (Alt and Audubon)) worked with Dan Devlin to create a forest management plan that achieved "their values". Shissler then determined whether DCNR's forest management was achieving their predesigned goal – which is not science driven, but a Shissler-designed "value-laden" agenda (according to Shissler).

At the time of the workshop in 1997, DCNR had participated in a pilot-year certification process, had approved of the process and NRC's (Shissler's) comportment, and was entering the first year for the Green Certification program. The process in Pennsylvania can be chronologued as follows:

- (1) Bryon Shissler has spent much of his career involved with "overabundant deer problems" (according to his biography). *"He has served as a consultant on deer and forest ecology to Audubon Pennsylvania, Scientific Certification Systems, and the Forest Stewardship Council."* He served on the "DCNR Ecosystem Management Advisory Committee, 1996-1997"; and on the "Forest Stewardship Council, Certification Working Group, 1997-2000."
- (2) From about 1996 to 2000, Shissler coordinated the effort to enroll Pennsylvania (DCNR) into FSC's Green Certification Program. According to Shissler's January 15, 1998 report (which

was sponsored by the Pinchot Institute) regarding a 1997 DCNR Green Certification Workshop that was held in Harrisburg:

*"The workshop focused primarily on a pilot project whereby 1.2 million acres of Pennsylvania state forest lands underwent a certification review by Scientific Certification Systems (SCS), a national certifier accredited by the Forest Stewardship Council (FSC). The on-the-ground review was performed by Natural Resource Consultants, Inc, (aka. Bryon Shissler) a Pennsylvania-based organization, on behalf of SCS."*

- (3) According to Shissler's words in his 1998 Green Certification document, one of his goals in the Pennsylvania Certification program was to use the public agency (DCNR) to expand the program to private lands throughout the state, and for DCNR to assist landowners in the process (that is, hiring Shissler).
- (4) Again, according to his document, one of Shissler's two principal objectives was to expand the program beyond Pennsylvania, stating, *"the certification of other state and federal public forest land in the United States."* Shissler could thus expand his business opportunities while serving as a tool to advance his and Audubon's ecosystem management/deer-reduction program to other states through the Green Certification Program.
- (5) SCS (a nationally-accredited certifier by the Forest Stewardship Council (FSC)) is based in Oakland, California, and so subcontracted all field and on-site work to Natural Resource Consultants, Inc. (aka Shissler). Gary Alt is listed as a part of Shissler's NRC team.
- (6) Shissler and DCNR developed a forest management certification plan for DCNR that is based on ecosystem management and deer reduction.
- (7) Success for Shissler's certification plan depended upon two cooperatives:
  - **First, DCNR must enroll in the Green Certification program.** (There appears to be no scientific reason and no forest quality reason for this, except that certification is said to enhance interstate and international marketability for the sale of state forest products.) According to DCNR, by *"1998 the remainder of the state's 2.1 million acres went through the process. Businesses such as The Home Depot agree that forest product certification encourages sound business practices in the forest products industry, and is good for their bottom line. Look for the certified stamp next time you are shopping for wood."*
  - **Secondly, the PGC must participate as the tool to reduce deer.** According to Shissler in the 1998 SCS certification report, *"We recognize that the BOF (DCNR's Bureau of Forestry) has no regulatory authority over the deer resource on its own lands. The unnaturally high levels of deer herbivory ... is a deliberate consequence of the deer management program administered by another State agency, the PA Game Commission. The BOF's certification is therefore conditioned on the eventual resolution of this important matter."*
- (8) Shissler and DCNR used the influence of other like-minded organizations (such as Audubon, The Nature Conservancy, and Shissler's Ecosystem Management Project), which applied validation to the DCNR/ PGC deer management program from another position in order to achieve their common goal -- ecosystem management through deer reduction.
- (9) Regarding Shissler's justification for DCNR to enroll in the program, quoting from the Pinchot Institute-sponsored and the Shissler-written January 1998 report that stemmed from Shissler's Green Certification workshop in Harrisburg:

*"Several state foresters (from other states) whose jurisdictions have elected not to pursue FSC certification...expressed the opinion that some of the certification criteria are too "value-laden" , not based on current forestry science (in other words, subjective). Bryon Shissler, head of the Natural Resource Consultants, Inc. (NRC) review team, countered this by stating that applied science is, by necessity value-laden: We concoct scientific solutions based on what we are trying to accomplish – which, of course, are based on what we deem valuable."*

Spoken like a true ideologue. In other words, Shissler stated that applied science is qualitative (whatever he chooses it to be); he contrives the science to meet his agenda (ecosystem management through deer reduction).

(10) The PGC complied in 1998 using a two-step process: first, Calvin DuBrock created the PGC's Deer Management Section which was headed by Gary Alt; and secondly, Calvin DuBrock created the Deer Management Working Group and assigned Scot Williamson of Wildlife Management Institute (WMI) to be the chairman. Subsequently, in January, 2000, Scot Williamson delivered the final report of the DMWG to the Board of Commissioners toward increasing the antlerless harvest and decreasing the size of the deer herd. The recommendations in Williamson's report included virtually every facet of what was to become the PGC's new deer reduction program, including the creation of Deer Management Units (to become WMUs), longer doe seasons and a concurrent buck/doe season to increase the antlerless harvest, more "hot spot" permits (to become DMAP), an early muzzleloader season, and other ways to increase the antlerless harvest.

**Conclusion.** Toward answering the question as to whether Green Certification in Pennsylvania is money-driven or agenda-driven – it's both. Keep in mind that although certification must come from a nationally-certified group, it was Bryon Shissler who both designed and certified DCNR's forest management process. The national certifier (SCS) simply provided its name as a rubber-stamp of approval. Therefore, DCNR chose to participate in order to enhance the interstate competitiveness and international marketability of forest products from Pennsylvania state forests. In so doing, unless DCNR terminates the certification agreement and ceases the process, DCNR becomes increasingly beholden upon the certifier (Shissler) – who, over time, gains increasing power over the process and forest management goals of the commonwealth.

It should be remembered that Shissler, Alt, and company should not be condemned for attempting to earn any amount of money for their consulting services, even for Green Certification audits. However, it appears that the process has been corrupted to serve the deer-reduction agenda of Shissler, Alt, and Audubon. Pennsylvania Green Certification is, therefore, a mutually-beneficial process enhancing the marketability of DCNR's forest products, while providing Shissler and his associates with an income- and agenda-achieving tool. Green Certification in Pennsylvania was designed to be dependent on gross deer reduction, and DCNR was not capable of achieving its goal unless the PGC complied with a new comprehensive statewide deer management program. PGC complied.

# DCNR'S DEER MANAGEMENT PLAN FOR ACHIEVING GREEN CERTIFICATION

By John Eveland  
November 1, 2010

**Preface.** This document is part two of a four-part series that describes "How Deer Reduction Was Achieved". The series consists of:

- Part I. The Relationship Between Green Certification and Deer Reduction
- Part II. DCNR's Deer Management Plan for Achieving Green Certification
- Part III. Impact of the Deer Management Working Group
- Part IV. Efforts to Validate the Deer Reduction Program

All four parts will be presented in separate documents.

**Introduction.** In 1996, DCNR participated in a pilot process to determine if it was in the agency's best interest to enroll in a Green Certification program. If annually certified, then the "green label" could be attached to wood products that were grown on state forest lands, possibly enhancing sales for both the State (DCNR) and the retailer (such as The Home Depot, using a DCNR example).

As a result of the 1992 Earth Summit in Rio, the Forest Stewardship Council (FSC) was founded in 1993 in Bonn, Germany. It was designed to influence forest management practices around the world toward achieving "well-managed and sustainable forests". The Forest Stewardship Council then certified only a few companies worldwide to grant the "green certification" label to participating forest managers such as DCNR. In Pennsylvania's case, Mr. Bryon Shissler served as the liaison between the certifier (Scientific Certification Systems (SCS) of Oakland, California) and DCNR, proposing the program to DCNR, determining what conditions were to be significant in DCNR's forest management plan toward achieving green certification, designing DCNR's corresponding deer management plan, and then serving as the auditor – on who DCNR, then, became dependent for certification. SCS did not design DCNR's plan or conduct the annual audit, but simply rubber-stamped the certification based on the audit of Bryon Shissler. Once certified, DCNR was able to announce that its forest products had been certified by the Forest Stewardship Council.

In 1997, Bryon Shissler held a workshop in the Rachel Carson Building in Harrisburg to present the results of DCNR's one-year pilot review period, and to encourage other states (which were in attendance) to participate in the Green Certification program. The primary concern of other state attendees was that this program was not based on science, but on the subjective values of the auditor (Byron Shissler) – and they declined to participate. However, DCNR enrolled in the program.

**Description.** Bryon Shissler and DCNR determined that the principal forest management practice toward gaining DCNR's green certification was to reduce the commonwealth's deer herd in the pursuit of greater nongame and forest understory biodiversity. Keep in mind that this forest management practice (deer reduction) was an arbitrary choice made by Bryon Shissler and DCNR, and could just as likely have been based on acid soils remediation, reducing the impacts of logging,

waterways reclamation following logging, or any number or combination of forest management practices. They chose deer reduction.

Therefore, once DCNR enrollment in the program was confirmed, and after reduction of the deer herd had been chosen as the primary forest management goal, a DCNR Deer Management Plan was developed. The plan identified deer management goals. Then, subsequent annual audits by SCS (Bryon Shissler) would determine if DCNR was achieving the deer reduction goals as listed in their Deer Management Plan. If so, certification would be granted by SCS (Bryon Shissler), and DCNR could apply the "green label" to its forest products.

Again, it should be remembered that neither Green Certification nor deer reduction affect the quality of the forest products that are harvested from the State's Green Certified lands – a 100 year old cherry log from a certified forest has the same appearance and quality as a 100-year-old cherry log from "Farmer Brown's" uncertified woodlot. The Pennsylvania Green Certification program was not, therefore, designed to increase the quality of wood products, but instead represents a mutually beneficial relationship between (1) those who conduct the audit and certify the forest (permitting them to advance their biodiversity agenda), and (2) DCNR (which could potentially gain an advantage in the marketability of its wood products).

To further expose the flaws of the Green Certification program, quoting Shissler in the 1998 Pinchot Institute report:

*"For a certified wood product label to be meaningful, the wood coming from a certified forest must be kept separate as it flows from the forest to the mill to the consumer. (A representative of) Procter and Gamble (which maintains large commercial forests in Pennsylvania) expressed the view that there was no viable way to track the wood from certified forests through large sawmills and chipmills that receive wood from numerous sources."*

Bryon Shissler responded:

*"A balance must be found which encourages good faith efforts and dissuades any unacceptable tradeoffs that thwart the overarching goal."*

Following are excerpts from DCNR's official Deer Management Plan that was developed toward achieving Green Certification. It was titled "Pennsylvania State Forests – Deer Management – A Plan for the Department of Conservation and Natural Resources". It is prefaced with relevant quotations from the actual 1998 SCS certification document. These excerpts – direct quotations by Shissler, SCS, and DCNR – leave no doubt as to the process that was used to decimate the deer herd.

(1) Quoting from the Scientific Certification Systems (SCS) document awarding DCNR its official certification in November 1998, Bryon Shissler was identified as the team leader, and DCNR participants are acknowledged:

*"This report documents an evaluation of DCNR's Bureau of Forestry...under the Forest Conservation Program of SCS, an international certifier of sustainable forest management operations accredited by the Forest Stewardship Council (FSC). The team leader was Bryon P. Shissler, consulting certified wildlife biologist, who had primary responsibility for forest ecosystem issues. The team met with Dr. James R. Grace, Bureau Director, and Daniel A. Devlin, Chief, Forest Resources Planning Section, on the afternoon of June 3, 1997."*

(2) From the above SCS document, DCNR was directed by SCS and Shissler to reduce the size of the deer herd if it wished to maintain Green Certification.

*"If (deer) populations are not reduced, the ability of both public and private landowners in Pennsylvania to meet or maintain FSC standards will be jeopardized."*

(3) From DCNR's Deer Management Plan, SCS (through its auditor and team leader, Bryon Shissler) identified the Corrective Action Requests (CARs) that were needed to solve the deer threat. Certification was conditional on compliance by the PA Game Commission.

*"DCNR Bureau of Forestry (BOF) has undergone a third-party review of the sustainability of the forest ecosystems on these lands (Pennsylvania State Forests), 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): ...the BOF shall initiate earnest and aggressive strategic, public advocacy, and political actions aimed at liberalizing hunting regulations in ways that reduce deer density on State Forests."*

*"SCS acknowledges that solutions to 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."*

*"This will be the guiding document by which DCNR will implement policy and management changes to address the deer overbrowsing issue across the State Forest system."*

(4) From DCNR's Deer Management Plan, the Pennsylvania Game Commission was identified as assisting in the Green Certification program by using drastic measures to reduce the deer herd.

*"The Pennsylvania Game Commission has begun to implement a variety of measures designed to bring the deer herd into balance with their natural habitats. In 1998, a Deer Management Section was created (with) ...supervisor, Dr. Gary Alt..."*

*"The first major change to Pennsylvania deer management after the creation of the Deer Management Section was the switch from a two-week buck-only rifle season and a three-day antlerless rifle season to a concurrent two-week buck and antlerless rifle season. This was a tremendous positive step forward, with antlerless deer hunting now occurring when most hunters were afield. The concurrent season increased the number and proportion of antlerless deer being harvested and reversed the historical trend of antlered deer dominating annual harvest levels. Other changes include a gradual increase in antlerless permits in most areas of the state, switching from counties to ecologically based Wildlife Management Units, a one-week early muzzleloader antlerless deer season, a 3-day early antlerless rifle season for Junior and Senior hunters, and more restrictive buck antler requirements... **All of these initiatives have been successful at providing tools for increasing the antlerless deer harvest.**"*

(5) DCNR's Deer Management Plan acknowledges antler restrictions as being designed as an additional method to increase antlerless reductions.

***"Increased restrictions for antlered bucks made it harder to harvest a buck so hunters were more apt to harvest an antlerless deer instead."***

For those who believe that antler restrictions were designed in the best interest of sportsmen, this DCNR document leaves no doubt that antler restrictions were concocted with a dual-purpose intent: (1) to serve as another significant tool to reduce the herd (reducing the number of legal buck so that frustrated hunters would refocus their attention on doe), and (2) to deceive sportsmen with a "carrot" toward enticing their approval of the deer-reduction program.

(6) The Deer Management Assistance Program (DMAP) was another attempt to further reduce the deer herd.

*"Other accomplishments in deer management included the completion of the Population Management Plan for White-tailed Deer in Pennsylvania (2003) and the creation of the Deer Management Assistance Program (DMAP). DMAP was unveiled in 2003 to give landowners a tool to work towards their individual deer management needs and goals through site-specific antlerless deer permits. Despite all these advances and record harvest levels of antlerless deer, the statewide deer population has not been documented to be reduced, although progress has likely been made in some areas."*

(7) SCS (Shissler) and DCNR recommended additional measures in the Deer Management Plan to reduce the deer herd, including the use of bait, night hunting, semi-automatic rifles, and dogs.

*"Clearly, the current tools of WMU-wide antlerless licenses, DMAP, and increasing access will work in certain areas across the State Forests, particularly those areas relatively accessible. Equally clear, some areas will not be sufficiently impacted by these tools with the current regulatory restrictions, and these restrictions will need to be relaxed to increase hunter effectiveness. It is expected that implementing most of these tools will require the review and approval of the Pennsylvania Game Commission."*

*"Potential Deer Management Tools:*

*(1) Early, Extended Rifle Hunting; (2) Multiple Permits per Hunter per DMAP Area; (3) Eliminate the Tagging Requirement before Harvesting Multiple Deer; (4) Information and Education Program on Venison Care and Preparation; (5) Information and Education (and possible regulatory change) on Packing Venison out of the Field; (6) Concessions with Outfitters to take Hunters In & Deer Out; (7) Party Hunting; (8) Unlimited Permits; (9) Incentive System to Have Individuals or Hunting Groups Responsible for Specific Areas: Provide special incentives like additional buck permits to specific groups to become responsible for meeting antlerless deer harvest "quotas"; (10) Use of Bait to Entice Deer; (11) Night Hunting; (12) Other Tackle: Many states allow the use of semi-automatic sporting rifles; (13) Dogs; (14) Professional Control of Deer."*

(8) The Deer Management Plan acknowledged that its success depended on using hunters to inflict their own demise – on the premise that hunters will harvest as many deer as permitted.

*"The greatest challenges appear to be making the most efficient use of a shrinking hunting population... The greatest potential lies in the growing group of hunters who appear willing to harvest multiple antlerless deer..."*

As a personal note from the author of this document, this statement by those who have perpetrated this agenda in SCS, DCNR, and the PGC is, to me, the most abrasive quotation that I have uncovered regarding the mismanagement of Pennsylvania's deer herd. Their perception of the sportsmen of the Commonwealth is insulting, and the fact that sportsmen are being used as unwitting tools to inflict their own demise is indicative of the deceit that permeates the deer management program.

**Conclusion.** According to the previous quotations from DCNR's Deer Management Plan – a plan that was concocted by SCS and Bryon Shissler toward achieving Green Certification – this Deer Management Plan was not intended to reduce Pennsylvania's deer herd. It was a plan to decimate the herd. The plan could not be implemented nor Green Certification achieved unless the PGC complied with the plan. As demonstrated in this document, PGC complied.

# IMPACT OF THE DEER MANAGEMENT WORKING GROUP

By John Eveland  
November 14, 2010

**Preface.** This document is part three of a four-part series that describes "How Deer Reduction Was Achieved". The series consists of:

- Part I. The Relationship Between Green Certification and Deer Reduction
- Part II. DCNR's Deer Management Plan for Achieving Green Certification
- Part III. Impact of the Deer Management Working Group
- Part IV. Efforts to Validate the Deer Reduction Program

All four parts are presented in separate documents.

**Introduction.** By 1998, the Pennsylvania Department of Conservation and Natural Resources (DCNR) had enrolled in the Green Certification program of the newly-created Forest Stewardship Council (FSC) of Bonn, Germany. (See Part I of the four-part series). Bryon Shissler served as the auditor and team leader for a California-based organization (Scientific Certification Systems (SCS)) that had been chosen by FSC to serve as their certifier, and whose role was to rubber-stamp the Green Certification award as directed by Mr. Shissler following his annual audits.

Enrollment in the Green Certification program does not affect the quality of the wood products coming from certified lands. Certification is simply a mutually-beneficial agreement whereby the auditor and certifier can influence forest management practices in pursuit of their personal agendas (in this case, the statewide reduction of Pennsylvania's deer herd toward achieving their ecosystem management goal), while the certified party (DCNR) potentially gains an edge in the marketing of timber and other forest products to retail companies such as The Home Depot.

Therefore, in 1998 SCS awarded (rubber-stamped) DCNR with the Green Certification label, contingent, however, on DCNR's continuing ability to adhere to the newly-created goals of SCS (Shissler) – the permanent reduction of Pennsylvania's deer herd as outlined in DCNR's Deer Management Plan (see Part II of the four-part series). This deer-reduction goal, however, could not be accomplished and annually maintained without complicity by the Pennsylvania Game Commission. This Part III of the four-part series describes how from 1998-2000 the Pennsylvania Game Commission (PGC) established and used the Deer Management Working Group toward creating a perception that the soon-to-be-announced deer reduction program had been designed by a broad spectrum of interests – that it was created out-of-necessity in the best interest of sportsmen. This, however, was a ruse.

**Description.** In order to comply with DCNR's Green Certification goal to reduce the deer herd, in 1998 the PGC was faced with voluntarily ending one of the most successful deer management programs in the nation – ended by decimating the deer herd. Choosing to participate with SCS, Shissler, and DCNR represented a fundamental change in management philosophies from the traditional maximum sustained yield of deer to a more nebulous goal of ecosystem management and maximizing biodiversity. Nevertheless, the PGC quickly responded to DCNR's need by initiating two actions.

First, PGC (Calvin DuBrock) created the Deer Management Section within the agency, and appointed Gary Alt as the new director. By initiating this action in 1998, the PGC, therefore, had indicated that it had already made the decision to implement a new deer management program.

Quoting DCNR's Deer Management Plan: *"The Pennsylvania Game Commission has begun to implement a variety of measures designed to bring the deer herd into balance with their natural habitats. In 1998, a Deer Management Section was created (with)..supervisor, Dr. Gary Alt..."*

Quoting Audubon from their 362-page master plan for achieving ecosystem management through deer reduction: *"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, P.G.C. is poised to pursue a more aggressive deer management program that, in theory, can effectively reduce deer densities in many parts of Pennsylvania."*

Secondly, the PGC established the Deer Management Working Group (DMWG) in 1998 to review the existing program and provide recommendations regarding the creation of a new statewide deer management program. Scot Williamson (a representative of the Wildlife Management Institute (WMI)) was selected by the PGC as the group's chairman. This action was designed to create the perception that the findings and recommendations of the DMWG had resulted from an unbiased independent assessment of the state's deer management program. In so doing, the responsibility of such a monumental decision to decimate the deer herd had been shifted from the shoulders of the PGC to the broad spectrum of interests represented by the DMWG.

Although it was cited that members of the DMWG were chosen to represent a diversity of special interests (including hunters, wood products industries, and animal welfare groups), in addition to Scot Williamson, the DMWG included not only Bryon Shissler, but others such as Cindy Dunn (Audubon), Susan Stout (U.S. Forest Service), and Ben Moyer (outdoor writer) who were adamant supporters of deer reduction, and who have remained long-term leaders of the deer-reduction program.

In January 2000, Chairman Scot Williamson presented the *"Findings and Recommendations of the Deer Management Working Group to the Executive Director and Board of Commissioners Pennsylvania Game Commission."* (Ironically, this document can be viewed at [www.audubon.org/chapter/pa/pa/Williamson](http://www.audubon.org/chapter/pa/pa/Williamson).) Virtually every facet of today's deer management plan was recommended by Scot Williamson, as presented in his findings to the Board of Commissioners. He recommended the elimination of the county-based management system in favor of Wildlife Management Units (WMUs), aggressive doe harvesting using increased antlerless allocations, aggressive hot spot harvesting (DMAP), the concurrent buck/doe season, and other doe harvest methods. Following the January 2000 presentation by the DMWG (Williamson) to the PGC's Board of Commissioners, Scot Williamson's recommendations were implemented by the PGC as their new deer management program. Therefore, Scot Williamson – whether alone or in concert with Bryon Shissler, Calvin DuBrock, and Gary Alt – had been the designer and author of what would soon become the PGC's new deer-reduction program.

Quoting Scot Williamson from the DMWG's final report in January 2000: *"On May 6, 1998, the Wildlife Management Institute convened a meeting of natural resource professionals to discuss the controversy surrounding deer management in Pennsylvania...The group suggested the creation of a Pennsylvania Deer Management Working Group...The Board of Commissioners of the PGC endorsed the creation of the (DMWG) in September, 1998. Each commissioner was given the*

*opportunity to nominate one sportsman representative to the working group to increase sportsmen representation. In the subsequent 15 months, the working group met seven times...Preliminary recommendations were delivered to the Commission in January 1999."*

The following recommendations were made as depicted in an article by the Harrisburg Patriot-News: *"A move away from the current county-based system of managing deer in Pennsylvania is among the first recommendations made yesterday to the Game Commission by the Deer Management Working Group."*

Thus, the Wildlife Management Unit (WMU) system of deer management was created, and the county-based system eliminated. It should be noted that in the report, Scot Williamson referred to the new concept as Deer Management Units (DMUs), instead of WMUs. Quoting Mr. Williamson, *"Small DMU's are necessary to better distribute hunter pressure, to focus harvest levels..."*

Again, quoting from the Findings and Recommendations of the Deer Management Working Group, Scot Williamson recommended that the doe season should occur at the same time as the buck season – the concurrent-season concept:

*"The working group, led by Scot Williamson of the Wildlife Management Institute, also recommended that the commission consider longer doe seasons and doe seasons that would run at the same time as buck seasons."*

In addition, Mr. Williamson recommended more deer permits for 'hot spots', which was subsequently renamed as the Deer Management Assistance Program (DMAP). Quoting from the January 2000 document: *"...more depredation permits on 'hot spot' farms..."*

During the period 1998-2000, there had been only a few people who were outwardly promoting a common goal to dramatically reduce Pennsylvania's deer herd. They included Bryon Shissler, Dan Devlin, Calvin DuBrock, Gary Alt, and Scot Williamson. This close-knit circle also included Cindy Dunn and Tim Schaeffer of Audubon Pennsylvania, Ben Moyer, and Susan Stout.

The group also formed the nucleus of the DMWG. In addition to Scot Williamson, members of the DMWG included Bryon Shissler, Cindy Dunn, Ben Moyer, and Susan Stout. It is highly likely, therefore, that the recommendations of the DMWG were orchestrated by this close circle of allies in concert with like-minded staff of the PGC (Calvin DuBrock and Gary Alt) – a pre-designed and manipulated process to give the appearance that the DMWG's recommendations to reduce Pennsylvania's deer herd were the result of consensus among a broad spectrum of interests.

**Conclusion.** The purpose of the DMWG was to design a PGC deer-reduction plan that would permit DCNR to achieve Green Certification. In 1998, Bryon Shissler was orchestrating the Green Certification process through DCNR, as well as the development of DCNR's Deer Management Plan (see Parts I and II of this four-part series). With Scot Williamson assigned as Chairman of the DMWG, and Shissler selected as a member, this allowed Shissler, Alt, DuBrock, and Williamson to concoct a tailor-made deer-reduction plan for the PGC that would accommodate DCNR's needs. In so doing, the DMWG's recommendations in January 2000 for a new PGC deer-reduction program would be perceived as the result of consensus among the diverse membership of the DMWG, and, therefore, provide validation to such a proposed drastic action while easing the responsibility for the act from the shoulders of PGC.

The services of Scot Williamson would again be used about a decade later in an attempt to validate the PGC's deer-reduction program. In 2008, Williamson was selected by Rep. David Levdansky in a pre-designed process to serve as the auditor of the PGC's deer-reduction program. As described in a document entitled *The Mismanagement of Pennsylvania's Deer Herd* (which can be viewed on the Allegheny County Sportsmen League website at [www.acslpa.org](http://www.acslpa.org)), Mr. Levdansky was the hand-selected legislative agent of Audubon (working with Timothy Schaeffer, Executive Director of Audubon Pennsylvania); as well as serving as legislative enabler for proponents of not only deer reduction, but also for restrictive firearms legislation, elimination of the PGC's commissioner system, and the merger of PGC into DCNR.

As described in the above-mentioned document, an audit was developed consisting of 15 questions that had been pre-designed by the small group of deer-reduction "orchestrators" to provide a positive response in favor of the PGC's deer program – attempting to validate the program as being based on "sound science". To further assure the outcome of the audit, by selecting Scot Williamson as the auditor, the legitimacy of the PGC's deer-reduction program was being investigated and determined by the person who had developed the program for the PGC 10 years before. Therefore, both the audit and the auditor were biased, and the audit-process was fraudulent – designed to deceive the board of commissioners, legislators, sportsmen, and the public to believe that the PGC's deer-reduction program was based on noble ideals that were in the best interest of all parties, including sportsmen. This, however, was not the case.

Some who have already been made aware of this have labeled the audit process as a blatant conflict of interest and a possible abuse of taxpayer dollars, a legislative ethics violation, abuse of power, or violation of the public trust. This matter, however, will be left for others to determine. Nevertheless, the above documentation indicates that the recommendations of Scot Williamson's DMWG in 2000, the resulting PGC deer management program that has continued for a decade, and the findings of Scot Williamson's audit in 2009 toward validating the deer program, should be discarded as being acts of questionable credibility that were designed toward advancing an agenda that is not in the best interest of the Pennsylvania Game Commission.

# EFFORTS TO VALIDATE THE DEER REDUCTION PROGRAM

By John Eveland  
November 19, 2010

**Preface.** This document is part four of a four-part series that describes "How Deer Reduction Was Achieved". The series consists of:

- Part I. The Relationship Between Green Certification and Deer Reduction
- Part II. DCNR's Deer Management Plan for Achieving Green Certification
- Part III. Impact of the Deer Management Working Group
- Part IV. Efforts to Validate the Deer Reduction Program

All four parts are presented in separate documents.

**Introduction.** As indicated in the previous Parts I-III, from 1996-2000 a small group of like-minded people successfully orchestrated the deer-reduction program – from Green Certification, DCNR's Deer Management Plan, and the Deer Management Working Group, to the creation of PGC's Deer Management Section and implementation of the deer-reduction plan. From that period until the present, this same small group has made several significant efforts to validate the deer reduction program and advance their agenda. This Part IV provides an assessment of these efforts.

**Description.** Following is a brief description of fifteen separate but related efforts to validate the deer reduction program.

(1) **Deer Management Working Group.** As described in Part III, the DMWG was established in 1998 as a mechanism: (a) to design and recommend to the PGC in 2000 the implementation of a new deer-reduction program, with precise methods to reduce the herd; (b) to provide validation to the new herd-reduction plan by creating the perception that it was the result of a consensus-of-opinion among a diverse group of special interests; and (c) to ease the responsibility of such a draconian deer-reduction act from the PGC and onto the "shoulders" of the DMWG.

**Those involved.** Members of the DMWG included Scot Williamson, Bryon Shissler, Cindy Dunn, Susan Stout, and Ben Moyer; they interfaced with Calvin DuBrock and Gary Alt of the PGC.

(2) **Audubon-Sponsored Conference.** In September 1999, Audubon Pennsylvania and the Sierra Club sponsored a conference in Harrisburg called the "*Conference on the Impact of Deer on the Biodiversity and Economy of the State of Pennsylvania.*" The event emphasized the perceived need to reduce Pennsylvania's deer herd.

**Those Involved.** The main speakers at this event (which was organized by Cindy Dunn, Executive Director of Audubon Pennsylvania) included Bryon Shissler, Susan Stout, Calvin DuBrock, Scot Williamson, and Ben Moyer. The keynote speaker was Gary Alt.

(3) **Gary Alt's Statewide Tour.** Gary Alt was likely the only person whom sportsmen would entrust with such a dramatic change in deer management, and so many sportsmen accepted Alt's plea to reduce the size of the herd: partly because Alt spared no statistic toward convincing

sportsmen that it was in their best interest, partly because he used the prospect of more large buck through new antler restrictions, and partly because sportsmen could not believe that they would be deceived by Alt. 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.

Here, it should be noted that an employee from The Pennsylvania State University recently stated:

*"When the PGC first started the herd reduction, Alt proposed an approximately 25% reduction. Sometime after that, Alt's alliance with Shissler became more pronounced. I remember reading where Alt made a public statement that DCNR had a gun to its head with the forest certification – and that the deer needed to be reduced much further for PA's forests to maintain certification."*

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. Alt and the Game Commission knew this, and abused this respect.

**Those Involved.** Gary Alt, as well as his PGC supervisor, Calvin DuBrock.

(4) **The 2001 Audubon Deer Management Forum.** A second step for Audubon's 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. The resulting Deer Management Forum, first convened in October 2001, was asked to set forth a vision of what ecosystem-based deer management might entail. In particular, the group was asked to describe how deer management might differ from current practices if deer were managed within an ecosystem framework that aims to conserve native biodiversity."*

This Audubon forum explored their new "Ecosystem Management Plan" that was designed to promote greater understory plant density and biodiversity within Pennsylvania's forests. Their goal to increase native wildflowers and nongame animals was dependent on the dramatic reduction of the state's deer herd. The forum was attended by staff members of PGC and DCNR.

**Those Involved.** The 10 members of the Deer Management Forum included Cindy Adams Dunn, Marrett Grund, Merlin Benner, Roger Earl Latham, and Bryon Shissler. Reviewers included Ben Moyer, Tim Schaeffer, and Susan Stout.

(5) **The 2005 Audubon Forum.** In 2005, Audubon concluded the forum with the preparation of a 362-page master plan for achieving their Ecosystem Management agenda through the drastic reduction of the deer herd. It was 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"*.

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 were 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."*

**Those Involved.** 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."*

**It should be noted** that the Audubon society is also orchestrating wildlife management campaigns in other states that adversely affect tradition, tourism, society, and economy – in the pursuit of an

agenda of limited and questionable benefit. As an example, quoting a National Park Service document:

*"On October 2007,...the National Audubon Society filed a lawsuit against the NPS alleging inadequacies in management of protected species at Cape Hatteras National Seashore (in North Carolina)".*

According to the lawsuit, Audubon is seeking to limit off-road vehicles on beaches toward protecting the habitats of piping plovers, American oystercatchers (both are species of shorebirds), and the loggerhead turtle. The NPS (which manages the National Seashore), citizens and local governments, businesses, tourists, and fisherman claim that the NPS had adequately managed the Seashore for the mutual benefit of all concerned parties – including indigenous wildlife. However, Audubon seeks to enforce additional safeguards that many say will offer little to no further benefit in protecting these species, while dramatically impacting tourism, fishing, businesses, and the livelihoods of a majority of the citizens along the Outer Banks.



In both Pennsylvania and North Carolina, Audubon seeks to impose new wildlife management programs that many claim to have demonstrable negative impacts to society and economy, with the potential for only limited benefits to wildlife and ecosystems. In Pennsylvania's case, Audubon's ecosystem management goal is to promote biodiversity in woodlands throughout Pennsylvania and the East – increasing the number of nongame birds and mammals as well as native shrubs and wildflowers, accomplished following the dramatic reduction of the deer population. However, an independent scientific assessment to determine how many of the state's 465 species of birds and mammals might benefit from a decimated deer herd indicated that of almost 400 birds, only grouse, ovenbirds, pewees, towhees, and a few other low-nesting forest perching birds might benefit from a decimated deer herd; only the snowshoe hare might benefit from about 70 species of mammals; and, as listed by DCNR, about two dozen wildflowers including trilliums and pink ladyslippers are appearing in greater numbers following deer reduction.

**(6) The 2004 Nature Conservancy Report.** 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."* The document proposed 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 would require the help of a politician. This planned agenda would require decades or even centuries to complete. 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..."*

**Those Involved.** Dan Devlin (DCNR).

(7) **Ecosystem Management Project.** In or around 2005, Bryon Shissler organized his Ecosystem Management Project, and stated its goal: *"The Ecosystem Management Project was created specifically to assist state agencies and hunters in their goal of balancing the number of deer with their natural habitats to benefit our forests, farms, communities and, of course, our deer resource."* Under his project, Shissler and Ben Moyer served as editors for a deer-reduction newsletter called the *"Resource Report"*, with Gary Alt contributing articles. In addition, the project sponsored *"Seminars Around The State"* and workshops by *"Gary Alt, Former Supervisor of the Pennsylvania Game Commission Deer Management Section"*. Quoting their newsletter, *"Other speakers will include Tim Schaeffer, Executive Director, Audubon Pennsylvania...and Bob Frye, journalist and author..."*



Gary Alt & Fawn

**Those Involved.** Bryon Shissler, Ben Moyer, Gary Alt, Tim Schaeffer, and Bob Frye.

(8) **Testimony to House Agricultural and Rural Affairs Committee.** On April 4, 2006, Bryon Shissler provided *"Testimony Before the House Agricultural and Rural Affairs Committee Regarding Deer Damage and Related Issues."* He identified himself and established his credentials by stating that he was *"Director of the Ecosystem Management Project."* He did not note, however, that the Ecosystem Management Project was a loose-knit four-person effort among himself, Ben Moyer, Gary Alt, and Tim Schaeffer toward producing a deer-reduction newsletter called the *"Resource Report"* and *"The Gary Alt Lecture Series"* (see the previous item 7 of this document).

He also stated to the House Committee that *"A recent independent evaluation by a team of scientists, on behalf of the Forest Stewardship Council, found that deer had decimated the diversity and sustainability of flora and fauna on the Pennsylvania State Forest..."* Again, Shissler failed to mention that **he** was the scientist mentioned in this statement, and the Forest Stewardship Council

in Bonn, Germany was but a distant participant in the process, with Shissler using their nebulous credentials while he orchestrated their Green Certification program with DCNR.

In addition, Shissler referred to the 362-page Audubon Deer Management Forum document (that he and Roger Latham had co-authored for Audubon in 2005) on multiple occasions to authenticate the need to reduce the Commonwealth's deer herd. It is debatable as to whether his credentials and presentation might be considered as being a deceptive effort to convince the House Committee that there was a broad consensus for the need to reduce the herd, while in reality it was he and his small group of close allies who were orchestrating the process.

Under the heading in his presentation "**NOT BAD PEOPLE BUT A FLAWED SYSTEM**", Shissler stated: "*We are not suggesting that the people within the Game Commission or hunters are bad people. We need a wildlife agency that represents all the people not just deer hunters. One option to achieve this goal would be to broaden the current PGC Board of Directors from being exclusively hunters to include a representative selected by residential communities, forest landowners, agriculture, environmental/conservation NGO's, etc...*"

**Those Involved.** Bryon Shissler.

(9) **DCNR's 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.

**Those Involved.** Merlin Benner (DCNR).

(10) **Coudersport PCN-TV Panel Discussion.** On September 27, 2007, a two-hour panel discussion was conducted in Coudersport, PA, and aired on PCN-TV. It was entitled "The Future of Hunting in Pennsylvania's Big Woods", with participants who included Jack Kraft (owner of First Fork Lodge who spoke for the many businesses throughout north central Pennsylvania which are failing or facing bankruptcy because of the declining deer herd in the region), and proponents of deer reduction – Susan Stout (U.S. Forest Service), the north central district supervisor of the PGC, and an I&E manager for DCNR. Paraphrasing the three proponents:

- Susan Stout told sportsmen to "get used to it; the deer herd will never return." She suggested that Jack Kraft and other lodge owners who have lost their clientele and are facing bankruptcy should readjust their marketing approach in the future. They should change their focus from deer hunters to family programs to count animal droppings.
- The PGC district supervisor suggested that deer hunters should refocus their attentions on squirrels, because squirrel populations were high.

- The DCNR employee stated that hunters who were complaining about not seeing many deer were most likely not good hunters – not scouting ahead of the season like their ancestors did.

**Those Involved.** Susan Stout et al.

(11) **DCNR's Ecosystem Management Forum.** 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.*"

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. 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.*"

**Those Involved.** 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.

(12) **Pinchot Report.** In April 2009, Bryon Shissler 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 states 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, opponents to this new DCNR/PGC ecosystem management philosophy may wonder if Pennsylvania is actually "ahead of the curve", or instead "out in left field".

**Those Involved.** Bryon Shissler and Marrett Grund.

(13) **The Levdansky/Audubon Audit.** Audubon Pennsylvania, 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 served Audubon and its partners as their agent to reduce the deer herd was former State Representative David Levdansky (D-39), Elizabeth.

In May 2007, a proposal was submitted by 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. The study 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 proposal from the budget), Rep. Levdansky presented Chairman Staback with his own version of an audit. Rep. Staback refused Levdansky's audit. Within an hour the Levdansky audit was discovered to be fraudulent, and likely authored by the PGC or close proponent of deer reduction. 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 conduct his (Audubon's) audit. Again, Rep. Staback refused this request. 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.

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.

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. Presuming that Rep. Levdansky could not have written such a biologically-technical audit, Sen. Pippy 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 request-for-proposal (RFP), and secondly by inserting 15 of the 23 questions from his original "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, Mr. Levdansky possibly violated one or more state rules, including House ethics law, violation of the public trust, and/or abuse of power

**Those Involved.** Former State Rep. David Levdansky and Tim Schaeffer (former Executive Director of Audubon Pennsylvania, and currently an executive of the Pennsylvania Fish and Boat Commission).

(14) **The 2009 WMI Audit.** In 2009, Rep. Levdansky selected the Wildlife Management Institute (WMI) to conduct his audit of the PGC's deer program at a cost of about \$95,000. Scot Williamson of WMI conducted the audit, which consisted of 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. These questions had been predesigned by proponents of the deer reduction program to yield a positive response in favor of PGC's deer program.

As presented in Part III of this four-part series, in 1998 the PGC had established a Deer Management Working Group (DMWG) to provide recommendations for a new PGC deer reduction program. Scot Williamson had been selected as the Chairman, and in 2000 presented his recommendations to the PGC's Board of Commissioners – recommendations that included virtually every aspect of the deer reduction program, including the concurrent buck/doe season, increased antlerless allocations, the creation of Wildlife Management Units, and DMAP. Scot Williamson was, therefore, the designer of PGC's deer reduction program.

As a result, former 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 the designer of the program as its auditor. Rep. Levdansky's act represents a blatant conflict of interest, and possibly 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 exposes the deer program as being without scientific merit. Considering this information, the WMI audit must be rejected as part of a fraudulent process. (Please see documentation of the audit process in a report entitled "The Mismanagement of Pennsylvania's Deer Herd." It can be reviewed on the Allegheny County Sportsmen League website at [www.acslpa.org](http://www.acslpa.org).)

**Those Involved.** Former State Rep. David Levdansky and Scot Williamson of the Wildlife Management Institute.

(15) **PGC's Three Deer Management Goals.** According to the PGC's "*Management and Biology of White-tailed Deer in Pennsylvania 2009-2018*", during the period 2003-2007 three specific goals were developed for the deer management program: (1) to manage for healthier deer, (2) to manage for an acceptable level of deer-human conflicts, and (3) to manage for healthier forests. These three goals were a long-after-the-fact attempt by PGC to validate, to justify, the deer-reduction program that had already been implemented years before.

The second goal (toward reducing deer-human conflicts) was recently discussed with a PGC deer biologist. The biologist was told that under this goal's line of thinking, then justification might be made to eliminate any number of other activities that are known to have harmful effects on humans, such as driving automobiles, playing football, walking across busy streets, drinking alcoholic beverages, smoking, and eating fast-foods. The biologist agreed that their goal to reduce deer/human conflicts was "irrelevant", and added that the goal to improve the health of deer was also an "inconsequential" pursuit. The deer biologist further stated that the only goal of substance was to improve the health of the forest.

Again, as described in the document entitled "*The Mismanagement of Pennsylvania's Deer Herd*" (which can be accessed on the Allegheny County Sportsmen League website at [www.acslpa.org](http://www.acslpa.org)), independent analysis has indicated that both the deer and the forest were not in poor health when the PGC implemented its deer-reduction program in 2000, and, in fact, both the deer and the forest were then, and remain today, in good health.

**Those Involved.** Calvin DuBrock, Gary Alt, and Christopher Rosenberry.

**Conclusion.** The commonalities among these fifteen efforts to validate the PGC's deer reduction program indicate that: (a) the deer reduction program was begun and orchestrated by one person – Bryon Shissler – with assistance from a small group of people, (b) these proponents of deer reduction pursued the nebulous goal of ecosystem management and increasing biodiversity – enhancing the populations of some native wildflowers and nongame birds and mammals; and (c) the PGC had referred to this Audubon/DCNR ecosystem management goal as the pursuit of healthier forests.

At first glance, this common goal of Audubon, DCNR, and PGC toward increasing forest biodiversity seems to be a noble pursuit, because its intent is to create a condition that might potentially increase the numbers of some native wildflowers, shrubs, nongame birds, and mammals. Achieving this goal became an ideological obsession that could only be achieved by decimating Pennsylvania's deer herd. However, at closer inspection, sacrificing the deer herd represents a scientific malpractice of great negative impact to both society and economy – the virtual removal of the dominant herbivore from the Commonwealth's natural ecosystem and destruction of one of the nation's leading deer hunting programs. The potential benefits of PGC's action are limited, at best – possibly increasing in the future the numbers of only a handful of plants and animals (including grouse, ovenbirds, pewees, snowshoes, trilliums, and pink

lady's slippers). The costs of the action, however, are great, increasing, incalculable, and, to date, remain disregarded.

These 15 efforts represent an orchestrated process to validate the deer program at any cost, and to convince decision-makers on the PGC's Board of Commissioners and in the State Legislature, sportsmen, and the public that deer reduction is in the best interest of all parties as well as the resource. Instead, as demonstrated in this four-part series, the Game Commission's deer-decimation program was a ruse – a bold act to deceive decision-makers toward advancing the narrow self-serving agendas of a handful of people.

In a July 2005 article in the Audubon magazine "Incite", Gary Alt was asked what he intended to do with the remainder of his life. Alt responded: *"I quit the commission because I could do more to solve this deer crisis by working on the outside. I promised the game commissioners that I would spend the rest of my career trying to change the system, that I would become their worst nightmare. That's where I'm headed."*

The objective of those few architects of the deer-reduction program was not intended to improve the health of the forest or the health of deer. Their goal was, instead, the single-focused obsession to decimate the statewide deer herd. It was a convenient mechanism for using Green Certification through deer reduction to generate income for the designer and revenue for DCNR. Forest and deer health were simply after-the-fact excuses that were concocted in an attempt to justify the action.

An independent assessment of the deer-reduction process, agendas, and involved parties has exposed and documented the ruse – the dismantling of one of the nation's premier deer management programs. It is now left to decision-makers to act in the best interest of sportsmen and the resource, forests and wildlife, families and tradition, society and economy, our Second Amendment right to keep and bear arms, and even the long-term solvency and existence of the Commission itself. This is not a time for compromise; it is time, instead, for decision-makers to realize the significance of what has been done, and to correct this bold and dramatic agenda-driven impact upon the Commonwealth.



*Speakers Gary Alt, Bryon Shissler, and Tim Schaeffer with trustees of the Willistown Conservation Trust at their 2006 Annual Dinner and Lecture "The Challenges of Overabundant Deer."*

## CONCLUSION

In 1998, when the PGC decided to comply with DCNR's need toward achieving Green Certification, a plan was set in motion to begin the systematic permanent reduction of the commonwealth's deer herd. Knowing that it could not admit to sportsmen the true reason behind the herd reduction program – to achieve Green Certification for DCNR – PGC created the new Deer Management Section and assigned Gary Alt as supervisor of the Section. Alt was the PGC's most credible employee, and the person whom sportsmen were most likely to trust. The PGC knew this, and in 2000 used this trust to deceive sportsmen into believing that the new deer reduction program was limited, temporary, and in the best interest of sportsmen. Alt used a new antler restriction policy – the prospect of shooting a large buck – as a "carrot" to entice sportsmen to accept Alt's proposal.

In order to further limit its risk, in 1998 PGC assembled a diverse group of special interests (including viewpoints from sportsmen and farmers to environmental organizations and journalists) to review the PGC's traditional deer management plan and recommend any changes that might improve the program. This was not a coincidental occurrence, because the PGC sought an independent recommendation to reduce the herd in order to deflect attention for the upcoming announcement from the PGC and onto the "shoulders" of this supposedly unbiased group. Scot Williamson of the Wildlife Management Institute (WMI) was selected by the PGC as Chairman of the Group, which stacked the DMWG with other staunch proponents of deer reduction. In addition to Scot Williamson, members of the DMWG who were also architects of the deer reduction effort included Bryon Shissler, Cindy Dunn of Audubon, Susan Stout, and Ben Moyer. Scot Williamson's recommendations included virtually every facet of what was to soon become the PGC's new deer management program. Williamson was, therefore, the author of the deer reduction program, which included the concurrent buck/doe season, DMAP, changing from county-based management to the system of Wildlife Management Units, and increased statewide antlerless allocations. It is likely, however, that the recommendations of Williamson and the DMWG were predesigned in concert with the PGC, especially with the oversight of Calvin DuBrock and Gary Alt.

Witnessing the imminent destruction of the herd, Audubon Pennsylvania (Cindy Dunn and Timothy Schaeffer) seized the opportunity to advance their agenda for a new ecosystem management style of wildlife and forest management which could be achieved through deer reduction, and quickly partnered with those few like-minded people (Bryon Shissler, Dan Devlin, Calvin DuBrock, Gary Alt, Susan Stout, Ben Moyer, and Scot Williamson) who were the original architects of the reduction program. For about a decade (from 1999 to the present) Audubon and their allies have orchestrated efforts toward deceiving sportsmen, state legislators, and the PGC's own Board of Commissioners into believing that the deer reduction program was justified and based on sound science.

The most infamous of these deceptive efforts will prove to be the successful attempt by former State Representative David Levdansky to conduct a fraudulent audit that had been PGC-orchestrated to verify the deer reduction program. Rep. Levdansky had been selected to serve as the agent of PGC and Audubon, and along with Timothy Schaeffer (Executive Director of Audubon Pennsylvania), struggled from 2007 to 2009 to eliminate a legislatively-approved

legitimate, independent, scientific assessment of PGC's deer reduction program, and to replace it with one that had been specifically designed to yield a positive response in favor of PGC's program. To worsen matters, Rep. Levdansky hired Scot Williamson of WMI to further assure that the audit would result in favor of the PGC and its deer reduction program. In so doing, not only was the audit fraudulent, but the person who was selected in 2009 to conduct the audit of the PGC's deer reduction program – Scot Williamson – was the person who had designed and recommended the program in 2000. This represents a blatant conflict of interest, likely a violation of state law, and justification to disqualify the entirety of the audit.

Therefore, the fraudulent audit that was conducted by Scot Williamson and concocted by Rep. Levdansky, Timothy Schaeffer of Audubon, and their allies in the PGC has been proven to be fraudulent, and therefore irrelevant – a waste of \$95,000 of taxpayer money. In contrast, the four-part series which comprise this document demonstrates that the PGC's deer management program was not justified – neither based on science, or designed in the best interest of sportsmen, the resource, the citizens of Pennsylvania, nor the PGC itself. The facts exposed in this four-part series that were derived from original Green Certification, DCNR, PGC, Audubon, and other documents, leaves no doubt that the motivation behind PGC's deer management program was based solely on the pursuit of *money* and the advancement of an environmental *agenda*.

It is now left to sportsmen and decision-makers on the PGC's Board of Commissioners and in state government to determine if this atrocity will be corrected, or if those few people who successfully perpetrated the act and deceived lawmakers will be permitted to continue orchestrating their agenda to decimate the commonwealth's deer herd.