



## **JICARILLA GAME AND FISH DEPARTMENT**

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**RE: MULE DEER MANAGEMENT IN NM GMU 2B**

April 8, 2025

Dear Mule Deer Stakeholder,

It is with great dissatisfaction that we share concerns and our responses to the mismanagement of mule deer harvest in Game Management Unit (GMU) 2B by the New Mexico Department of Game and Fish (NMDGF). After decades of adapting to the various threats and challenges mule deer face, the Jicarilla Game and Fish Department (JGFD) is protesting excessive buck harvest rates by NMDGF, which have undoubtedly impacted regional buck abundance and age class and affected regional mule deer herds and hunts.

### **JICARILLA MULE DEER PROGRAM**

Healthy and abundant mule deer herds are incredibly important to the Jicarilla Apache people. Most notably, hunting mule deer holds the utmost cultural, traditional, and socioeconomic values to the Nation. The JGFD most central objective is to provide high quality hunting opportunities for tribal members, followed by world-class and extremely limited hunting opportunities for non-tribal guests. As a result of this importance, the Jicarilla mule deer management focus is proactive and data driven with robust population and habitat monitoring efforts, coupled with management-based research programs that inform annual decisions (e.g., season structure and quotas), which are all intended to detect and mitigate the many threats and challenges wildlife face. Any undue burden to our wildlife model is viewed as a threat to the Nation's sovereignty and the Jicarilla Apache way of life; current GMU 2B harvest levels threaten the JGFD model of conservation and must be corrected immediately.

### **CAUSE & EFFECT: NMDGF LIQUIDATED REGIONAL BUCK ABUNDANCE AND AGE CLASS**

From 2019-2022, the NMDGF authorized a late season youth mule deer hunt in GMU 2 with an indefensible and arbitrary quota of 150 licenses per year over a four-year cycle. This hunt was justified under the shortsighted objective of 'providing opportunity to youth while on Thanksgiving Holiday Break'. The hunt was authorized without due diligence, a complete disregard of legally mandated consultation as well as a lack of supporting NMDGF migration and population data amidst one of the worst droughts on record. Regrettably, the two regional sovereign Native American Nations (Jicarilla Apache Nation, Southern Ute Indian Tribe) who were knowingly excluded from the NMDGF decision-making process, also hold decades of the best available science regarding regional mule deer biology, migration, movements, survival and whose deer management objectives are most significantly impacted by this hunt.

Concurrently, JGFD deer monitoring has revealed an abrupt decline in mule deer buck abundance and age class, as well as a significant decline in hunt quality. Accordingly, to adjust to the decline and to set harvest levels within what the resource allows, the Nation has reduced its mule deer quota to a mere 50 over the 850,000-acre reservation (2025). Conversely, the NMDGF total license issuance remains excessive (2025 quota = 1,750), of which 700+ licenses fall within November (rut) seasons.

### **OBJECTION:**

Since 2020, the State has ignored our appeals for change, and continues to mismanage the harvest of mule deer through the issuance of excessive licenses despite our clear protest and advocacy for harvest restraint. This raises significant questions about New Mexico's commitment to cooperatively manage migratory big-game and is a recognizable shift in the State's policy of cooperating with the Jicarilla on wildlife management issues.

- Mismanagement of a shared deer herd has impacted Jicarilla Apache Nation
  - Culture and Traditions
  - Hunting Opportunity and Economy
  - Sovereignty
- Unilateral decision is a clear Violation of State Law and Court Order
- Migration science—the state continues to unfairly target bucks that are grown and protected on neighboring lands, as migration studies all have indicated deer wintering in GMU 2B are essentially migratory (estimated at 90-95%).
- Drought— authorized during one of the worst drought periods ever recorded, when proactive deer management would have actually reduced harvest levels
- Managing big-game with science. It is apparent that social inputs are governing NMDGF decisions, while science, data, and facts are disparaged. This is incredibly concerning given the public trust and fundamental responsibility given to wildlife managers in determining safe and sustainable harvest levels of a multijurisdictional migratory deer herd.
- Excessive harvest during mule deer breeding season— bucks are extremely vulnerable to rifle harvest during the rut. The NMDGF 2019-2022 deer rule concentrated unsustainable buck harvest levels removing an alarming ~540 advanced age bucks (~90% success rate), which was additive to the already excessive quotas issued during regular (non-youth) rifle seasons (2,500 total licenses per year). This period effectively liquidated buck abundance and age class. The current NMDGF deer rule (2023-2026) continues to aggressively harvest and remove annual cohorts of bucks (1,750 licenses per year; 700+ in rut), thereby reducing any possibility of recruiting older age class males into the population, mandating drastic change to restore buck age class and abundance.

### **HOW CAN I HELP?**

Data-driven change is needed, and as a result of our urgent concerns, the Nation is asking for your support to reform the harvest management of mule deer in NM GMU 2B from Opportunity to Quality Deer Management.

**We are formally requesting the following changes from the NMDGF Game Commission:**

1. **OPEN THE NMDGF DEER RULE 2023-2026:** the Jicarilla Apache Nation requests that the State's management of deer in GMU2B changes from **Opportunity-based to Quality Deer Management to take effect in 2026**, which under NMDGF rules mandates harvest restraint. The magnitude of the problem requires immediate action. Quality Deer Management must be the standard for GMU 2B and GMU 2C (currently under Quality Deer Management) moving forward.
  - a. **IMMEDIATE ACTION:** Under authority of the NMDGF Director, we ask for a 20% reduction in GMU2B tags in 2026 season, all from November Rifle Seasons
  
2. **Direct NMDGF to work with JGFD** to permanently reform deer management from Opportunity to Quality in GMU2B to be implemented no later than the 2027 Hunting Season and the **ADOPTION of QUALITY DEER MANAGEMENT in 2027** in GMU 2B shall last a minimum of 8 years, and thereafter, both parties shall agree to the subsequent management of deer.
  - a. **In accordance with the NM State Tribal Collaboration Act and Court Order (1990), the NMDGF and JGFD shall meet quarterly to discuss mule deer conservation.** In addition to the San Juan Interstate Wildlife Working Group, relevant big-game staff shall meet to foster confidence and trust in implementing a cooperative management strategy that benefit migratory mule deer, which includes proactively working on threats and challenges facing migratory deer in our respective jurisdictions.
  
3. **CHANGE the 4-year NMDGF cycle** to allow NMDGF staff to adapt and proactively manage using science-based review and assessment of conditions resulting in responsible harvest levels each year. The state is tied to a four-year season structure. This precarious management approach lacks the ability to buffer stochastic events and correspondingly adapt to fluctuations in population performance. For example: record-setting drought and extreme temperature conditions have spanned two cycles of NMDGF rule setting. Drought significantly impacts deer, yet no adjustments have been made by NMDGF to mitigate impacts, instead excessive harvest compounds them.

## **LETTERS, EMAILS, and SUPPORT FOR NMDGF UNIT 2 MULE DEER HARVEST REFORM**

The JGFD and Nation is scheduled to present our concerns and proposed solutions to the NMDGF State Game Commission at their regular meeting, April 25, 2025 in Roswell, NM. Concurrent support for swift management change in GMU2B is needed. If you feel compelled to do so, please contact the New Mexico State Game Commission.

The Nation will not stop managing mule deer for health and abundance, which in turn supports Jicarilla Apache culture, sovereign wildlife conservation, regional economy, and the interstate habitats in which this herd relies upon to survive and reproduce. Our program is committed to abundant and mature bucks. We achieve these objectives through science, and we insist the NMDGF do the same for the benefit of migratory deer.

For more information or questions on how you can further support this much needed change, please contact our office at (575) 759-3255.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Inez, Jr.", written in a cursive style.

Mr. Bernard Inez, Jr., Director  
Jicarilla Game and Fish Department