

THE CONCERNED SPORTSMEN OF MICHIGAN

Dedicated to protecting and promoting Michigan's Whitetail Deer resource, through the promotion of responsible, science based policies and regulations.

www.concernedsportsmen.net

Public Comment 3 - 14 - 2019

Today I'd like to share some further concerns about the APR experiment that has been proposed for the CWD zone.

As you are aware, you are charged with managing our resources utilizing sound science. Contrary to that directive, the APR's being proposed will have a demonstrable negative impact on efforts to control and contain CWD in Michigan.

The most effective approach for lowering CWD prevalence and limiting the geographic spread of the disease is to remove as many diseased animals from the herd as possible, while limiting the number of yearlings which disperse.

APR's cause specific demographic changes within the herd. The primary change that occurs is a significant increase in the number of two and a half year and older bucks in the herd.

Figure 1 indicates that in the core zone, the 2.5 year old male age class has the highest prevalence rate for CWD. Increasing the number of deer in that demographic will result in an increase in overall herd prevalence. That is a direct negative impact resulting from APR's.

APR's also shift harvest focus from antlered bucks to antlerless deer. As you can see from figure 2, adult antlered bucks have more than double the prevalence rate of antlerless deer. By shifting harvest focus from antlered bucks to antlerless deer, you substantially increase the number of deer that have to be harvested to remove a single infected deer from the herd. You would have to shoot 2.3 antlerless deer instead of 1 antlered buck, to mitigate disease at the same rate. If we are already struggling to remove enough deer from the core zone, why would we want to enact a regulation that would more than double the number of deer needed to be removed, to achieve the same mitigation impact?

It is well accepted science that yearling dispersal provides a vector for the geographic spread of communicable diseases such as CWD. CWD response plans from many other states, as well as Michigan's own response plan, note that fact. The primary purpose of APR's is to protect yearling bucks from being harvested.

Figures 3 & 4 show the demographic breakdown of CWD positives in the core zone, in 2017 & 2018. The blue dots on the map indicate yearling bucks that tested positive. They comprise 21% of deer testing positive.

By protecting 70% of those yearling buck with APR's, you will be reducing the number of CWD positive deer detected by approx. 15%. Most of those protected CWD positive yearling bucks will disperse, carrying the disease to other geographic areas, resulting in an increase in prevalence and spread of CWD in Michigan

The basis of this proposed experiment, as stated in the resolution, was to measure the effectiveness of regulations on the spread and prevalence of CWD, increasing antlerless harvest and decreasing deer populations.

As proposed, this experiment will provide no data regarding the spread and prevalence of CWD. It will also provide no data regarding the effect of APR's on increasing antlerless harvest, that is not a metric being studied. An analysis conducted by MSU last year indicated that APR's in the NW12 had no impact on increasing antlerless harvest. Figure 5 shows that the level of antlerless harvest in the NW12 had a decreasing trend line under APR's.

By moving forward with this, you are essentially ignoring the demonstrable negative impacts that will occur, in the pursuit of an experiment which fails to address three of the four metrics which were the stated purpose and which provides very little data of any immediate utility that can be used in our efforts to control and contain CWD in Michigan.

Figure 6 shows a breakdown by township of the 2018 CWD sampling and prevalence rates in the core zone. As you can see, some of the townships in the core zone, some of which may be included in the proposed experiment, have localized prevalence rates as high as 4%. Yet you are contemplating putting regulations in place in that zone which will increase those prevalence rates.

That graphic also shows that sampling levels in some of the core area townships are still well below what is needed to accurately detect CWD. To accomplish that, a sample size of approx. 295 deer per township would be required. So the fact that some townships show CWD not detected, is likely more attributable to lack of sample size than the absence of disease.

The final graphic shows a breakdown of sampling in the Lower Peninsula for 2018. As you can see, the minimum sample size needed for an accurate determination is lacking in all too many counties.

Instead of spending \$250,000 plus dollars on an APR experiment, it seems that funding would be much better allocated to increasing sampling levels, increasing the number of self service sample dumpsters available to hunters and increasing utilization of wildlife services to remove animals in the immediate vicinity of identified positives.

We would urge the NRC to take these facts into account and reconsider moving forward on the APR experiment in the CWD zone.

Thank you.

Jim Sweeney

The Concerned Sportsmen of Michigan

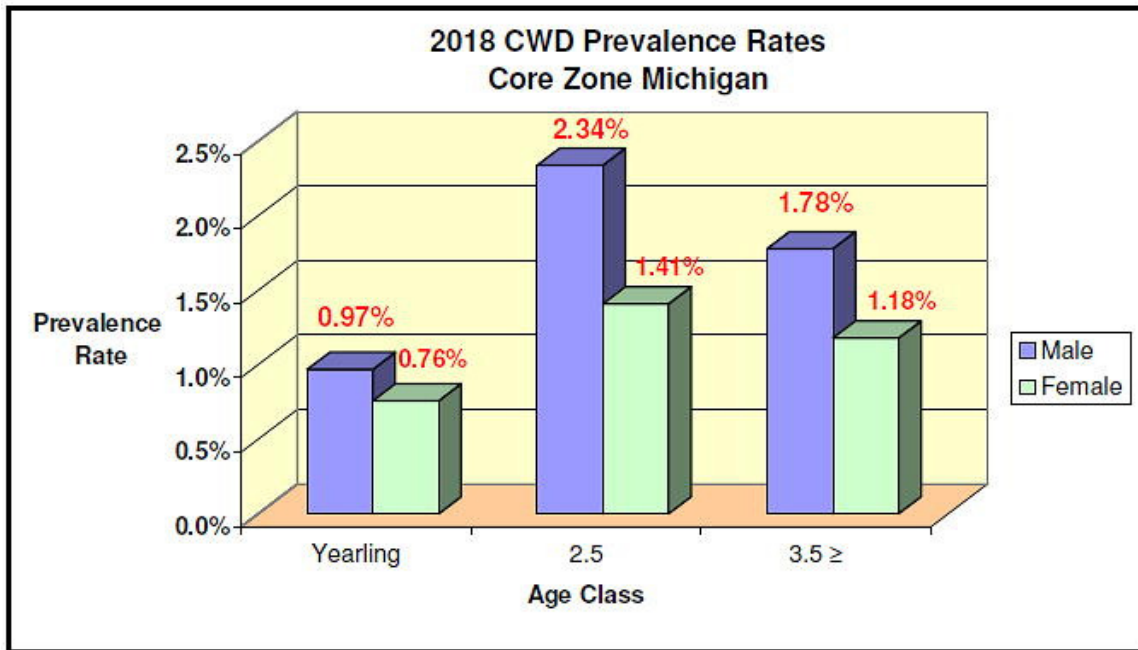


Figure 1

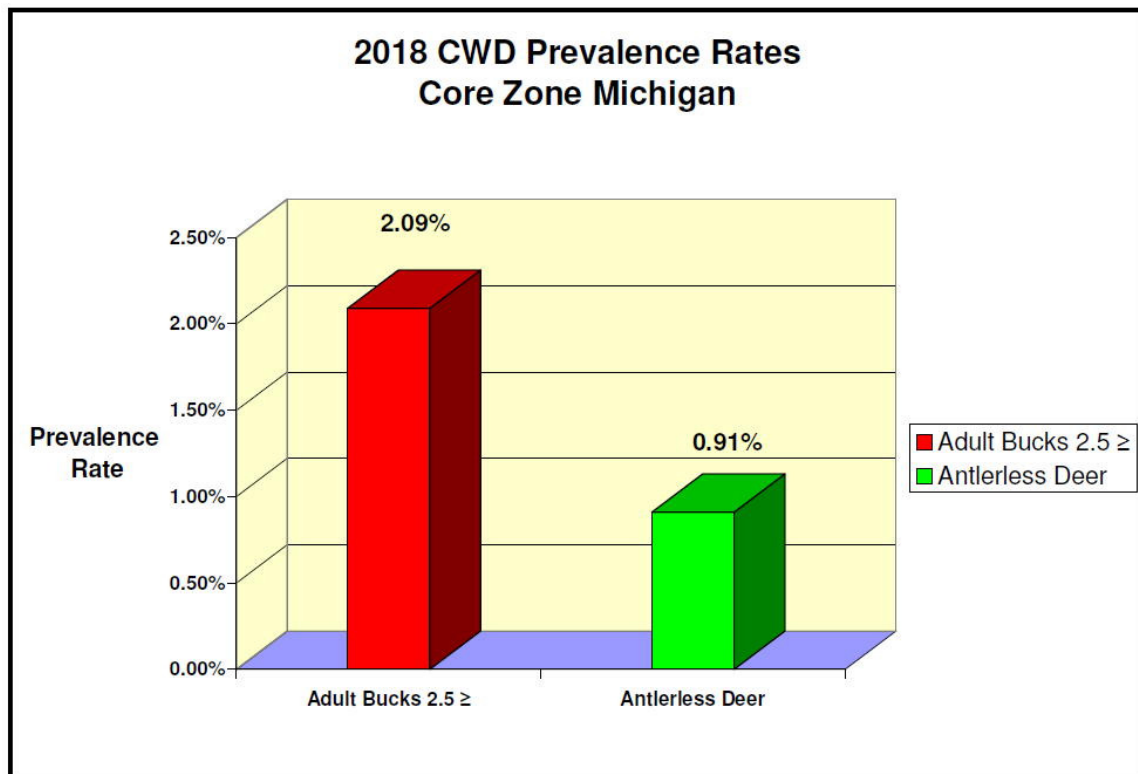


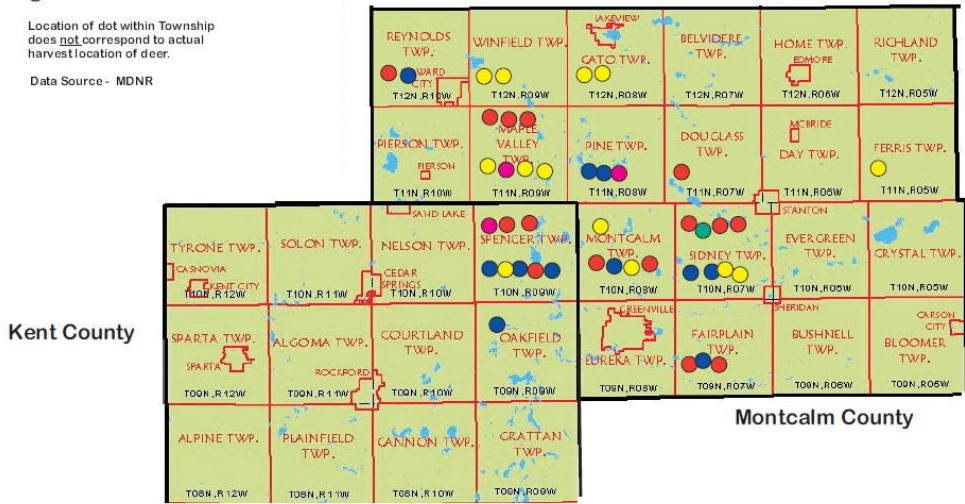
Figure 2

2017 CWD Testing Results

- - Adult Buck
- - Adult Doe
- - Yearling Buck
- - Yearling Doe
- - Doe Fawn

Location of dot within Township does not correspond to actual harvest location of deer.

Data Source - MDNR



The Concerned Sportsmen of Michigan

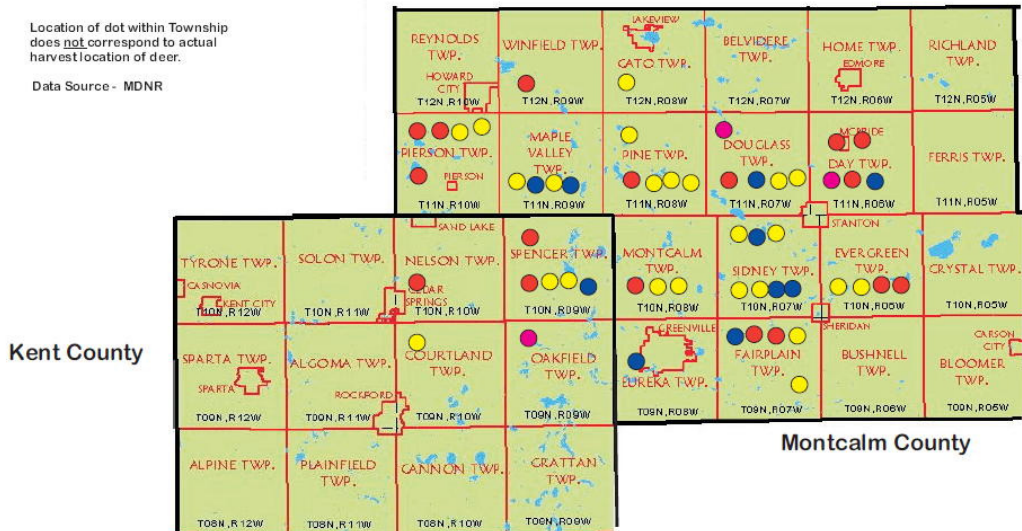
Figure 3

2018 CWD Testing Results

- - Adult Buck
- - Adult Doe
- - Yearling Buck
- - Yearling Doe

Location of dot within Township does not correspond to actual harvest location of deer.

Data Source - MDNR



The Concerned Sportsmen of Michigan

Figure 4

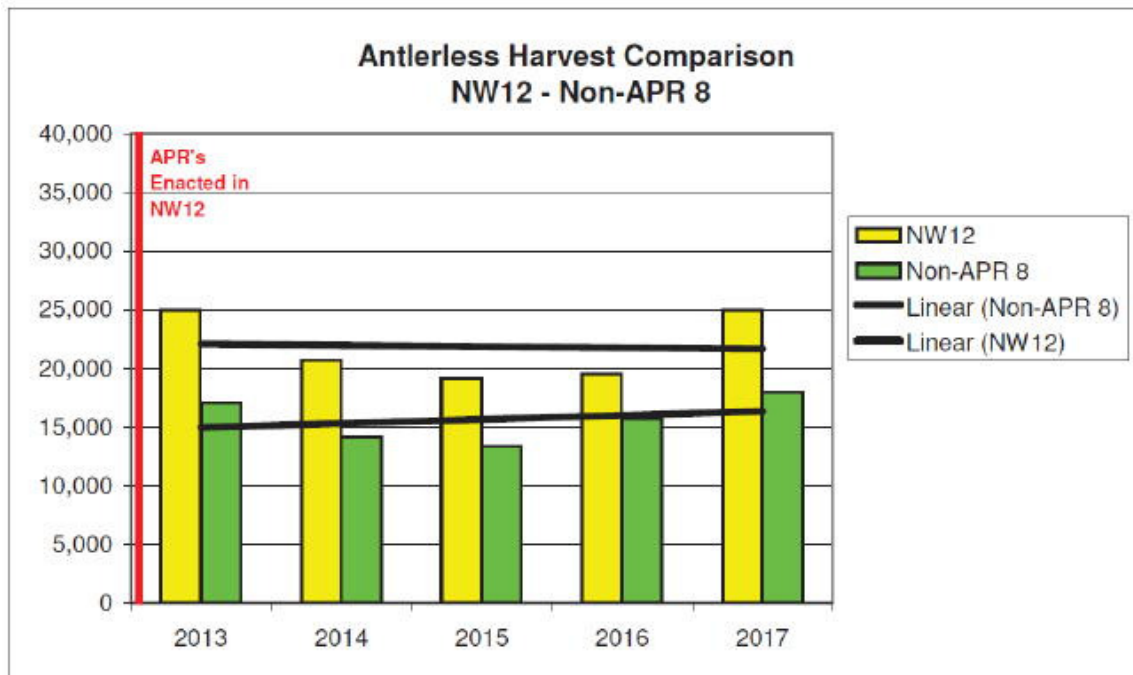


Figure 5

2018 Core Area CWD sampling & prevalence by township

Newaygo County

Brooks ND 126	Croton ND 146	Reynolds ND 67	Winfield .55 % 182 1	Cato .39% 258 1	Belvedere ND 240	Home ND 171	Richland ND 200
Grant ND 150	Ensley ND 127	Pierson 4.00 % 125 5	Maple Valley 3.01 % 133 4	Pine 2.75 % 182 5	Douglass 1.21 % 330 4	Day 2.11 % 237 5	Ferris ND 347
Tyrone ND 63	Solon ND 88	Nelson 1.75 % 114 2	Spencer 3.50 % 143 5	Montcalm 1.42 % 211 3	Sidney 2.65 % 264 7	Evergreen 2.42 % 165 4	Crystal ND 214
Sparta ND 25	Algoma ND 76	Courtland 1.00 % 100 1	Oakfield 1.04 % 96 1	Eureka .88 % 114 1	Fairplain 3.01 % 166 5	Bushnell ND 186	Bloomer ND 186

Kent County

Montcalm County

Prevalence Rate

Sample Size

Not Detected in 2018

Number of Positives

Minimum sample size of 295 needed for 95% probability of detecting 1 CWD positive at 1% prevalence rate.

Figure 6

Michigan Lower Peninsula CWD Sampling - 2018

Counties in Blue indicate sample sizes sufficient to detect Cwd at 1% prevalence with a 95% probability.

Counties in Red indicate sample sizes insufficient to detect CWD at 1% prevalence with a 95% probability.

- Counties where CWD was detected by sampling in 2018.

