

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.

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June 14th, 2018 - Public Comment

In regards to the CWD regulations proposed by the DNR, there are two changes that we would like you to consider before implementing this WCO.

First, the DNR's proposed 13 County CWD management zone is much too conservative. The primary goal of CWD mitigation policies should be to limit the geographic spread of the disease, to try and contain it to areas where it already exists and prevent it from spreading throughout the rest of the Lower Peninsula. The most effective way of doing so is to create a CWD Containment Zone that includes a buffer surrounding the core area, composed of counties where we don't think that the disease has spread to yet. That buffer zone should then be the focus of testing, to determine the current geographic scope of the disease, as well as the focus of regulations designed to further limit the spread.

The CWD management zone proposed by the DNR offers no such buffer zone, it has core CWD counties directly on it's periphery.

If you accept the premise that the Ingham County CWD positives are linked to the Kent County core area, which is likely, it provides us with a yardstick that can be used to create a reasonable estimate for where CWD may have already spread in mid-Michigan, which is indicated by the red circle on the maps.

As you can see, much of that area falls outside of the DNR's proposed management zone. Our recommendation is to expand the DNR's 13 County proposal to encompass 26 Counties, which would cover almost all of the area contained within the circle indicated on the map. It makes little sense to start out with a small management zone and then have to continually adjust it in size, as Missouri and other states have had to do. We would be far better off implementing a more comprehensive zone and then also implementing regulations within those buffer areas, designed to limit the further spread of the disease.

Consider those buffer counties acting as an air-lock in a lab or a moat around a castle, designed to contain the disease to it's existing core location.

Secondly, I'd like to address the DNR's proposal to re-instate the 4 pt. APR on the restricted tag, within the CWD zone. This suggestion makes absolutely no sense and flies in the face of established science, which was supposed to be the basis for these CWD mitigation regulations. The undisputable fact is that yearling bucks, through the mechanism of dispersal, pose a substantive threat of spreading CWD

geographically. APR's are specifically designed to protect those yearling bucks and to prevent them from being removed from the herd, which in turn increases the number of those yearling bucks which will either disperse or survive for extended periods after having dispersed, both of which can play a key role in spreading CWD across the landscape. There is absolutely no place for a regulation that offers protection to yearling bucks in an effective CWD mitigation plan and this proposal by the DNR flies in the face of both the best available science and common sense.

In closing, we would respectfully request that the NRC exercise their oversight authority and modify Wildlife Conservation Order Number 12 of 2018 as proposed, to expand the list of counties contained in the CWD management zone with the addition of Mason, Lake, Osceola, Clare, Oceana, Midland, Saginaw, Allegan, Berry, Calhoun, Jackson and Washtenaw Counties and further to remove the language related to re-instating the 4 pt. APR restriction to the restricted combination tag and expand that exemption of any APR's to the expanded 26 County CWD management Zone.

Thank You,


Jim Sweeney

The Concerned Sportsmen of Michigan

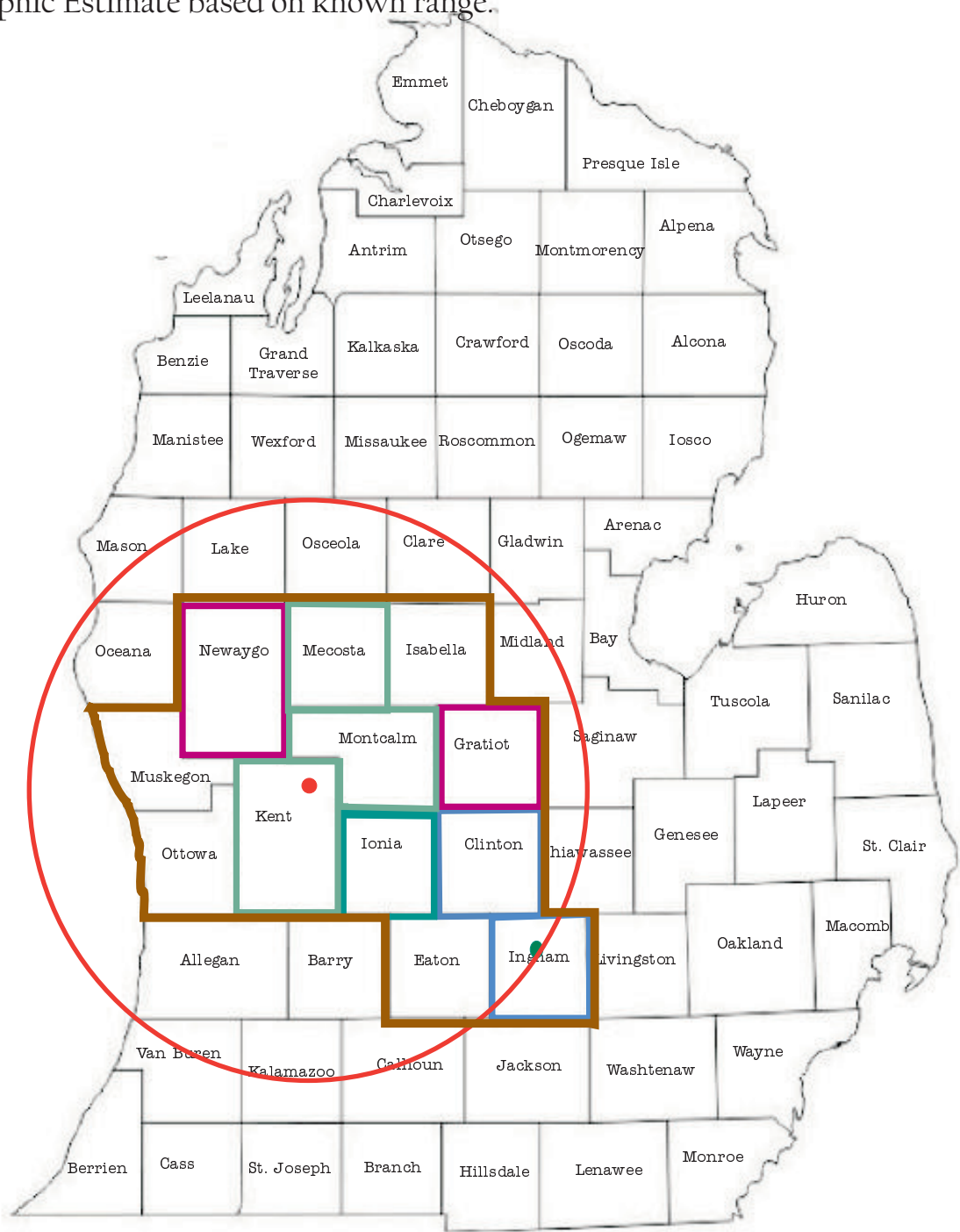
 - Proposed DNR CWD Management Zone

 - 2015&16 CWD Positive County

 - 2017 & 18 CWD Positive County

 - High Probability County

 - Geographic Estimate based on known range.



 - 2018 Proposed CWD Containment Zone

 - 2015&16 CWD Positive County

 - 2017 & 18 CWD Positive County

 - High Probability County

 - Estimate based on known range.

