

# **Hunters Choice Regulations in the TB zone**

**Jim Sweeney  
The Concerned Sportsmen of Michigan**

**NRC Meeting May 12th, 2016  
Public Comment**



As a follow up to Dr. O'Brien's presentation last month regarding bovine Tuberculosis, in which he indicated that there has been an alarming jump in the TB prevalence rate in the deer herd over the last year, I'd like share with you some concerns that we have that harvest regulations in the TB zone may be contributing to the increase in prevalence rates.

The current buck harvest regulations in the TB zone are known as Hunters Choice or HC regulations. These regulations impose a mandatory Antler Point Restriction on both of the combo tags, for those hunters who want the opportunity to harvest two antlered bucks. HC regulations were put into effect in 2010.

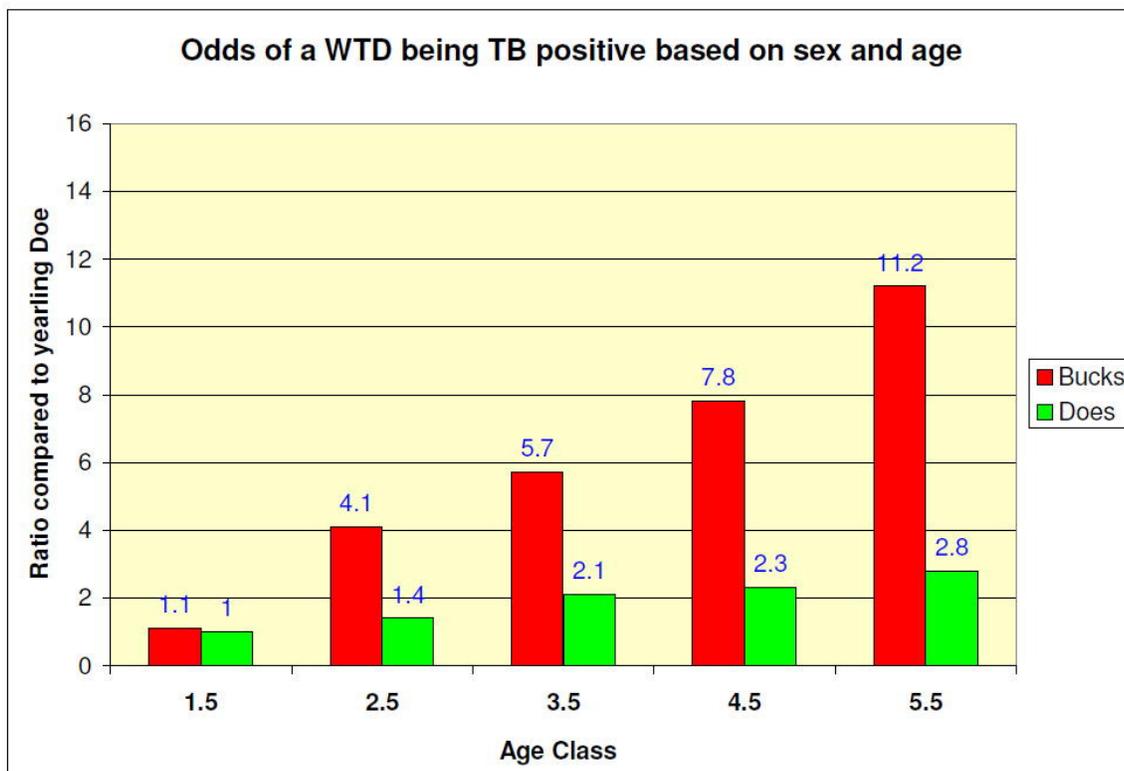


Figure 1.

As indicated in Figure 1, older bucks have much higher odds of having TB than either younger bucks or does. APR's, including HC regulations, are designed to increase the number of older bucks in the herd, which is why they are popular among some hunters.

Outside of disease zones, increasing the number of older bucks to satisfy hunters, is generally not a problem. However, in areas where communicable diseases like TB and CWD are present, increasing the number of older bucks in

the herd can potentially increase the average herd prevalence rate for those diseases.

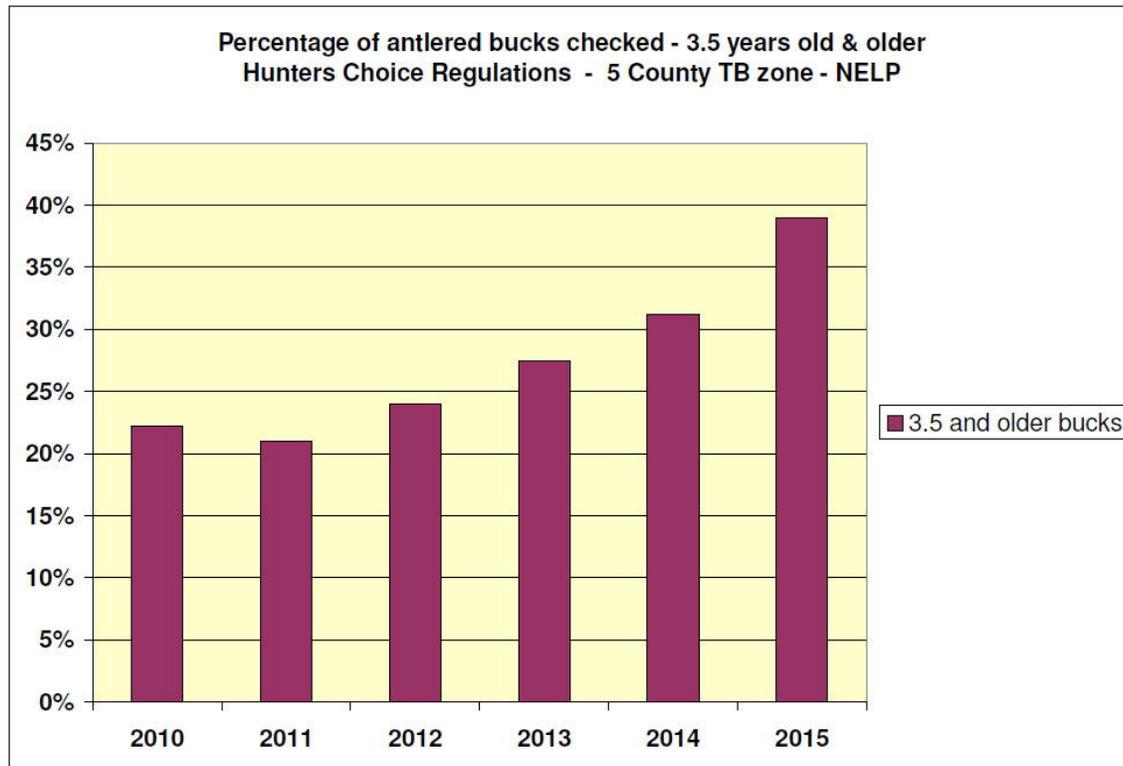
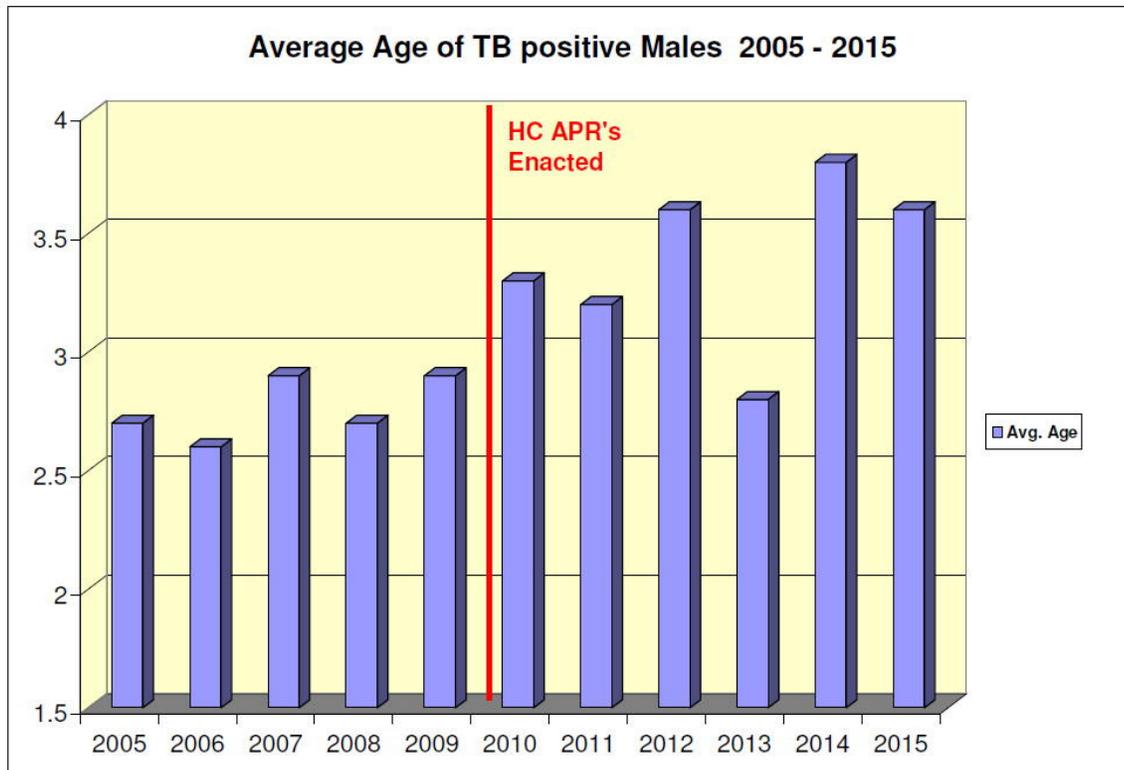


Figure 2.

Figure 2 indicates the increasing percentage of antlered bucks, 3.5 years and older, checked at DNR check stations in the 5 county TB zone since HC regulations were put in place in 2010. In the 5 years since HC regulations were enacted the percentage of older bucks checked has increased from just over 20% of the total to almost 40%.

An additional concern resulting from protecting yearling bucks with APR's is an increase in the spread of communicable disease outside of core areas, as yearling bucks are the deer most likely to cause disease to spread across the geographic landscape, due to the mechanism of yearling dispersal.



**Figure 3.**

Increased numbers of older bucks in the herd are also reflected in the sample of deer testing positive for TB. Figure 3 details the average age of antlered bucks testing positive for TB in Michigan, both before and after HC regulations were put in place. The average age of bucks testing positive has increased under HC regulations, indicating an increasing buck age structure, potentially contributing to the jump in prevalence rates that occurred last year.

The concerns that APR's would lead to an increase in herd prevalence were voiced at the time these regulations were first contemplated. The response was that it was hoped that APR's would increase the number of antlerless deer being harvested in the TB zone, thus lowering the deer population, which in turn could reduce disease prevalence rates, offsetting any negative impact resulting from an older buck age structure.

<p style="text-align: center;"><b>Antlerless Harvest Trend</b>  <b>Hunters Choice Regulations compared to three year baseline average.</b></p>							
Year	Alcona	Alpena	Oscoda	Mont.	Presque Isle	452	Combined
2007	1,906	1,297	1,593	1,688	1,804	2,218	10,506
2008	2,056	1,595	2,096	1,875	2,526	2,548	12,696
2009	1,573	1,179	1,417	1,473	2,547	2,457	10,646
Avg.	1,845	1,357	1,702	1,679	2,292	2,408	11,283
2010	1,756	1,128	1,914	1,444	1,942	1,794	9,978
2011	1,849	1,084	1,836	1,656	2,155	2,388	10,968
2012	2,120	1,423	1,743	1,266	2,615	1,988	11,155
2013	1,768	1,392	1,766	1,778	2,532	3,431	12,667
2014	1,593	1,183	1,689	1,547	2,022	2,120	10,154
Avg.	1,817	1,242	1,790	1,538	2,253	2,344	10,984
Change	-2%	-8%	5%	-8%	-2%	-3%	-3%

Figure 4.

These regulations have not, however, resulted in a substantial increase in the antlerless harvest in the TB zone. As you can see from Figure 4, there has been a net decrease in antlerless harvest over the time span that HC regulations have been in effect, both in the core TB area and in 4 of the 5 surrounding counties in the TB zone.

The hoped for benefit of increased antlerless harvest never materialized, while the anticipated negative impact of increased prevalence rates resulting from greater numbers of older bucks, has unfortunately occurred.

In light of the alarming jump in prevalence rates that occurred last year, it seems questionable to continue HC regulations, when they appear to be having a demonstrably negative impact on attempts to decrease the level of bovine tuberculosis in Michigan.

The State of Michigan, USDA and area farmers have spent over \$200 million dollars trying to combat this disease, to try and mitigate the negative impact that it has on cattle and dairy producers. Increased prevalence of TB in the deer

herd poses a direct threat to the agricultural community and if disease rates continue to increase it could jeopardize the USDA TB free status that is in effect in portions of the NELP.

With the switch to multi-year regulatory cycles, modifying regulations in the middle of a cycle is not desirable but when disease mitigation is involved, the need to remove regulations that may be driving higher levels of disease, supersedes the desire to adhere to an established cycle.

As a result, we would ask that the NRC take another look at the HC regulations that are currently in place in the TB zone and give consideration to rescinding those regulations. We would support adopting the same regulatory approach that has been taken in the CWD containment zone, designed to lower the buck age structure, which removes all APR's from both of the combo tags. Having consistent regulations in both of Michigan's established disease mitigation zones makes a lot of sense and could help eliminate some confusion among the public, as to why one disease area has regulations designed to lower the male age structure, while the other has regulations designed to increase the male age structure, a contradiction that leaves many of us puzzled.