



June 16, 2020

To: Natural Resources Board Members

c/o Laurie J. Ross, Board Liaison
Office of the Secretary, Wisconsin DNR
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PO Box 7921
Madison WI 53707-7921

Re: Agenda Item 4C – 2020 Antlerless Deer Quotas & Hunting Seasons

Thank you for the opportunity to comment on this action item. Wisconsin's Green Fire has reviewed the department recommendations for 2020 and offer the following comments for your consideration. We regret that Covid-19 concerns will prevent our opportunity to testify before you at your June 24th meeting.

We begin by thanking Department staff for all their efforts to create meaningful opportunities for public participation with the County Deer Advisory Council (CDAC) deliberations given the chaotic impact of the coronavirus pandemic. Ironically, the "Safer at Home" climate likely provided more deer stakeholders the time to participate in the on-line feedback survey. We appreciated the effort to allow the public to listen to CDAC discussions via teleconference for their April and May meetings. Public participation in these teleconference opportunities was unfortunately low, perhaps due to the format and inability to directly comment to CDAC members. Finally, we very much appreciate the on-line deer herd status reports presented by the local wildlife staff. Local wildlife staff are trusted resources for information and their reports were clearly valuable to the public based upon the number of times they were viewed on-line.

We would be remiss if we did not also express our sincere thanks to all the volunteer members of the CDACs. 2020 is the final year of the 3-year term of CDAC service and recruitment has begun for CDAC members to serve the next 3-year cycle. All CDAC members serve an important role of being a local citizen advisor to the Department on deer, as well as, being the designated voice for the various stakeholder groups on each council. It is a lot of responsibility and they do not get thanked enough for the time they give each year.

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Deer Herd Concerns– From a historical perspective, Wisconsin’s deer herd has grown significantly over the past 6 years and is at record levels across the farmland deer management zones. We are seeing visible signs of the ecological and economic friction that large deer populations can cause.

As the Department’s cover memo indicates, agricultural damage in Grant and Marquette counties exceeds the tolerable damage threshold established as NRB policy in NR 1.15(2) (am). Statewide, issuance of crop damage and nuisance deer shooting permits has trended upward in the last 4-5 years.

Tree and understory regeneration are significant concerns across Wisconsin. In 2017, the Governor’s Council on Forestry wrote to Governor Walker and DNR Secretary Stepp in response to concerns over deer herd impacts. In their letter, the Council noted, *“Prolonging a disproportionate balance between deer numbers and healthy forests will, in the long run, do a great disservice to our natural resources, Wisconsin’s forest products industry, and all aspects of outdoor recreation.”* In recent years, concern over deer browsing and forest regeneration has resulted in the issuance of deer shooting permits on county and industrial forests.

During 2011-14, the Department’s large deer research study examined survival rates for deer in both a northern forest and central farmland study area. In both areas, starvation of fawns and juvenile deer were major causes of mortality during tough winters. This was a surprising finding for the farmland study area where food is very abundant during the growing season. It demonstrated that deer browse was insufficient to support the large deer herds in this area in winters with deep, prolonged snow. The diminished supply of deer browse is likely the result of prolonged intensive browsing by these herds.

A profoundly serious concern is the relationship between large deer herds and Wisconsin’s struggle with chronic wasting disease (CWD). CWD is now found, and steadily increasing in prevalence, in wild herds in 29 Wisconsin counties, and in captive herds in another 9 counties (for a total of 38 of 72 Wisconsin counties, or nearly 53%). It appears that CWD will ultimately infect deer herd statewide in 10-20 years unless further steps are taken. All indications are that even before that time, possibly within 3-5 years, negative population impacts will be documented in southwest Wisconsin. Beyond southwest Wisconsin, we are likely to see a steady progression of population impacts in other areas within 25 years following the first discovery of CWD in a county. Large deer herds make CWD management more challenging. While CWD transmission is primarily frequency dependent, high deer densities increase the likelihood that infected deer will mix with healthy deer and spread the disease.

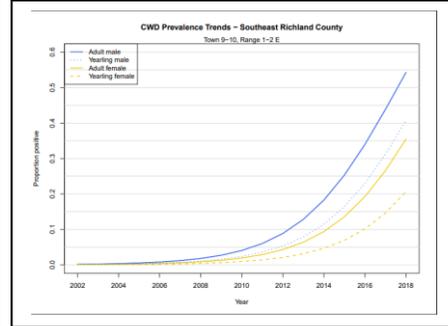
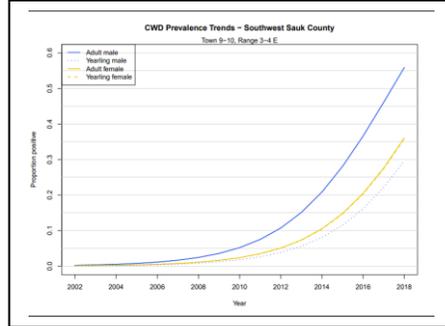
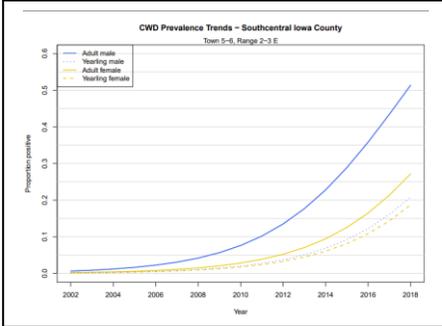
2020 Quotas and Seasons -The 2020 recommended quotas and permit levels are in-line with recent years but are not enough to prevent herd growth (e.g. maintain the existing herd) or decrease herds where that is desired. In Farmland Zones, the recommendations are best described as “aspirational”. The quota recommendations are simply not achievable within our current deer season framework. Consequently, established 3-year deer population changes will not be achieved and the deer herd concerns discussed above will continue.

Our specific recommendations to the NRB for 2020 are:

- 1. We support including Grant and Marquette Counties within the Holiday Hunt authorization, and**
- 2. We further recommend extending the Holiday Hunt and Extended Archery Seasons to all deer management units within the Farmland Zones. This will maximize hunting and harvest opportunities, as well as, add consistency across large areas of the state.**

More herd control tools needed for Farmland Zone Units – This year, as we have done in 2018 and 2019, we are strongly encouraging the Board and Department to enact herd control seasons and strategies that can be used a year from now. Specifically, we recommend working with the legislature to remove existing statutory constraints to season modifications that would allow moving herds in desired directions. The slow, but steady, decline in deer hunter numbers as the baby boomer demographic ages out of active hunting also erodes our harvest capacity. This adds emphasis on the need for effective season structures.

Managing CWD prevalence – There is no greater challenge to the health of Wisconsin’s deer herd and deer hunting heritage than Chronic Wasting Disease. We led the nation in CWD+ deer detections last year. We have included the three graphs shown below in our comments again this year because the message is worth repeating. These graphs depict the change in CWD prevalence in northern Iowa County, southwest Sauk County and southeast Richland County. These graphs should be of great concern to the NRB. Of further concern is the graphs from other areas of Wisconsin’s CWD infected areas are all showing upward trends.

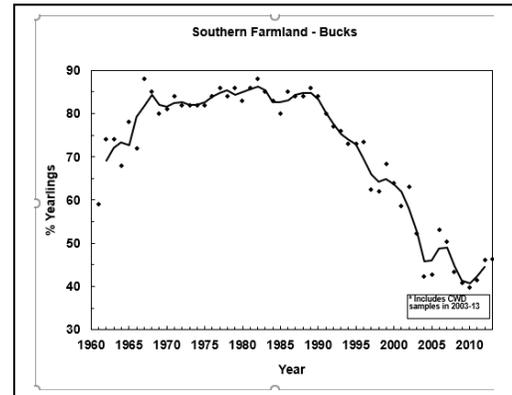


Like viruses, researchers have documented multiple strains of CWD within North America and that we are likely to identify additional strains as CWD evolves over time. They caution that each strain may have different abilities to cause infections in other species, wild and domestic, including humans. This is another cause for concern from the increased spread and prevalence occurring in Wisconsin.

Wisconsin lacks a strategy for reducing CWD prevalence. Within DMUs with established CWD infections, our actions amount to taking the patient's temperature (CWD prevalence) without treating the underlying disease processes. The best management practices approved by the Association of Fish and Wildlife Agencies in 2018 include the following set of actions:

Managing CWD Prevalence should include utilizing harvest, sharpshooters or other removal mechanisms combined with statistically appropriate sampling and testing to monitor changes in prevalence. Strategies may include: 1. Targeting the portion of the population most likely to have CWD. 2. Targeting animals in known CWD hotspots. 3. Adjusting timing to most effectively remove infected animals. 4. Reducing cervid density in CWD-positive areas with high animal density. 5. Eliminating practices that promote artificial cervid concentrations to minimize environmental contamination. 6. Utilizing a coordinated, adaptive management approach that allows evaluation of experimental CWD suppression strategies whereby the data gathered from these efforts would be used to develop improved strategies. 7. Restricting or prohibiting intact carcass and high-risk material transport out of CWD management zones.

WGF recommends that the NRB and department implement changes that increase the rate of harvest of bucks in Wisconsin's CWD infected areas. Adult and yearling bucks are the most heavily infected segment of the population. We also know that yearling bucks are the most likely class of the deer herd to disperse and spread CWD to uninfected areas. As the attached graph shows, yearling buck harvest is dramatically lower today than in the past. Increasing the buck harvest in infected areas is a best management practice Wisconsin should be implementing.



Thank you for consideration of our comments.

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Cc: Secretary Preston Cole
Keith Warnke – Administrator, Fish, Wildlife and Parks Division
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Wisconsin's Green Fire is a statewide organization dedicated to supporting our conservation legacy by promoting science-based management of natural resources. Our members include career natural resource professionals and scientists from a variety of disciplines throughout Wisconsin. For more information, visit <https://wigreenfire.org/>.