



QUALITY DEER MANAGEMENT ASSOCIATION

P.O. Box 160 • Bogart, GA 30622

phone (800) 209-3337 • fax (706) 353-0223 • www.QDMA.com

29 December 2008

National Park Service
Environmental Quality Division
RE: CWD Detection & Initial Response Plan/EA
P.O. Box 25287
Denver, CO 80225

Dear National Park Service,

On behalf of the Quality Deer Management Association (QDMA) I am writing to provide input on the draft alternatives for the Chronic Wasting Disease (CWD) Detection & Initial Response Plan/EA for the Antietam and Monocacy National Battlefields. The QDMA is an international nonprofit wildlife conservation organization dedicated to ethical hunting, sound deer management and preservation of the deer-hunting heritage. The QDMA has over 53,000 members nationwide including more than 3,000 wildlife biologists, foresters and natural resource professionals. As such, QDMA is widely regarded as the most respected whitetail organization in the United States.

There is a need for a CWD Detection & Response Plan for the Battlefields that supports long-term protection and preservation of white-tailed deer and other park resources. A successful plan will detect the presence of CWD and minimize its spread to other animals. A successful plan can also help balance the deer herd with the available habitat, and keep deer from adversely impacting forest regeneration, sensitive vegetation and other wildlife species. The current deer densities on the battlefields are higher than desired and the habitats show signs of overabundant deer herds.

The draft alternatives for the CWD Detection & Initial Response Plan/EA list four management alternatives. The QDMA supports Alternative B: CWD Detection and Reduction Response. This alternative provides the necessary tools to Battlefield managers to effectively sample the deer population for incidence of CWD, and it provides the ability to balance deer herds with the available habitats. We realize some federal administrations do not favor population reduction as a viable alternative. However, CWD is a serious threat to deer populations and overabundant deer herds negatively impact themselves as well as the health of the habitat and other wildlife species.

With respect to deer removal, sharpshooting is considered the most humane method of reducing a deer herd by the American Veterinary Association. Sharpshooting programs have been successfully employed in many communities across the country by private consultants, local police authorities and federal agency personnel. This approach is proven to be successful at reducing deer populations and the meat can be donated to food banks. Sharpshooting programs using archery equipment are generally less efficient than programs using firearms, but this method is preferred over approaches that do not target the deer abundance problem. Deer populations can be reduced quickly and this is the preferred removal technique in areas inaccessible to hunting. However, this approach is expensive relative to hunting and it is a controversial technique if hunting is an option.

A combination of management strategies often produces the best results with respect to deer management programs. Using multiple "tools" affords managers the ability to match the preferred technique to a specific situation. Sharpshooting can quickly reduce a deer population and provide samples for a CWD detection program. However, healthy deer populations can rebound quickly, and an annual removal program is necessary to maintain populations at levels compatible with the habitat. Regulated hunting is the perfect combination to an initial sharpshooting program. Regulated hunting has been proven to be an effective deer population management tool, it is cost effective, it results in immediate removal of animals from the population, and it is the principal management tool used by state agencies to manage free-ranging deer. Wildlife management agencies recognize this approach as the only effective, practical and flexible method available for regional deer

Continued.

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and the preservation of the deer-hunting heritage.*

population management. By using regulated hunting, biologists can maintain deer populations at desirable levels or adjust them in accordance with local biological and/or social needs by manipulating the size and sex composition of the harvest; season type, timing and length; and by the number of permits.

Safety is paramount when using regulated hunting as a management tool. Fortunately, research clearly shows hunting is safe. American Sports Data, Inc. conducted an extensive study in 2002 that examined more than 100 sports and activities. Twenty-eight activities, including cheerleading and aerobics, had higher injury rates than hunting. Safety concerns with hunting can be minimized by having potential hunters pass written exams and weapon proficiency tests. Written exams can identify hunters who possess an acceptable level of knowledge on deer biology, management and shot placement. Weapon proficiency tests identify hunters who handle weapons safely and have the ability to consistently achieve proper shot placement. Hunters can even be required to hunt from elevated stands so all shots are directed at the ground and weapon type can be regulated to maximize public safety. The Battlefields could also implement youth hunts as they are great ways to provide outdoor opportunities for youths and statistics show supervised youth are among the safest hunters as they are only involved in a fraction of hunting accidents.

In closing, we request you select Alternative B: CWD Detection and Reduction Response for the Battlefields' CWD programs, thus providing the additional benefit of improving the health of the deer herds and habitats. We appreciate the opportunity to provide input on the draft alternatives. Please contact me with any questions/comments or if I can provide additional information.

Respectfully,

Kip P. Adams
Certified Wildlife Biologist,
Director of Education & Outreach