



# QUALITY DEER MANAGEMENT ASSOCIATION

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Date: 6 May 2020  
To: Pennsylvania Game Commission  
From: Kip Adams, Director of Conservation  
Re: CWD response plan

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On behalf of the Quality Deer Management Association (QDMA) I appreciate the opportunity to provide input on the Pennsylvania Game Commission's (PGC) chronic wasting disease (CWD) response plan. The QDMA is an international nonprofit wildlife conservation organization dedicated to ensuring the future of white-tailed deer, wildlife habitat, and our hunting heritage. The QDMA has over 50,000 members nationwide including nearly 4,000 in Pennsylvania. Notably, Pennsylvania's membership includes hunters, landowners, and numerous wildlife and forestry professionals.

The QDMA supports the following items within the CWD plan:

- Ban movement of high-risk cervid parts outside of disease management areas.
- Ban deer feeding in disease management areas.
- Collaborate with Department of Agriculture to strengthen oversight of captive cervid operations.
- Ban importation of high-risk cervid parts from all areas outside of Pennsylvania.
- Refine diagnostic testing strategies and expand testing capacity.
- Expand mandatory CWD testing of elk to include all harvests and encountered mortalities.
- Increase deer hunting opportunities.
- Supplement increased harvest opportunities with targeted removals as needed.
- Employ extensive communication efforts to increase public understanding of the severity of CWD.

The QDMA questions the proposal to removal antler point restrictions. Even though bucks contract CWD at higher rates than does, we believe it is a mistake to focus the majority of disease management efforts on bucks in disease zones. Research in Minnesota showed yearling does dispersed at similar rates as yearling bucks, and research in Wisconsin showed does were 10 times more likely to be CWD positive when there was one CWD positive relative nearby. Even though CWD prevalence rates are higher in bucks, there are always more than twice as many 2.5+ year-old does as bucks on the landscape.

Importantly, only about a third of the hunters who go afield in Pennsylvania will shoot a deer in any given year, and only about 11 percent shoot more than one deer. At a time when the PGC is asking for increased harvests the vast majority of hunters shoot a single deer, at most. Removing antler point restrictions encourages hunters to shoot bucks. We believe this would reduce the antlerless deer harvest, cause deer populations to grow above desired levels, and increase the number of CWD-positive deer on the landscape. The QDMA believes we need to

shoot bucks in disease zones, but in these areas, hunters should be shooting more adult does than bucks.

In this early stage of a disease outbreak, protecting any adult deer can be counterproductive to long-term success. Once CWD is established in the deer herd though, the strategy changes. Older bucks are two to four times more likely to have the disease than younger bucks. Therefore, on paper, the best way to combat CWD where it is established is to keep density low and the age structure young. That means not allowing bucks or does to mature. However, in reality, hunters are needed to regulate deer populations, and many hunters stay engaged for the opportunity to pursue mature bucks.

It is QDMA's opinion that as long as hunters continue hunting, shooting antlerless deer, and helping keep deer herds in check, then it is more beneficial to have some mature bucks. Therefore, QDMA's recommendation in areas where CWD is established in the population is for hunters to harvest antlerless deer to help reduce deer density and disease transmission, and apply increased harvest pressure to all bucks, including a focus on those 2½ years of age or older. Given Pennsylvania hunters' habits, we feel removing antler point restrictions would not achieve the stated goal of reducing deer densities or CWD prevalence in disease zones.

Please contact me if I can clarify our position or provide additional information. Thank you for your time and for your commitment to Pennsylvania's natural resources.

Respectfully,

A handwritten signature in blue ink that reads "Kip Adams" with a long horizontal flourish extending to the right.

Kip Adams  
Director of Conservation