



NATIONAL DEER ASSOCIATION

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29 July, 2021

Christopher Leiser
Public Affairs Officer
4 Farm Colony Drive
Warren, PA 16365

RE: Comments Regarding USFS Wildlife Feeding Restriction Proposal

Dear Christopher Leiser,

On behalf of the National Deer Association (NDA), I am writing to provide our support for the recently announced United States Forest Service (USFS) proposal to temporarily restrict wildlife feeding on the Allegheny National Forest (ANF) in northwestern Pennsylvania. NDA is a national nonprofit wildlife conservation organization dedicated to ensuring the future of wild deer, wildlife habitat and hunting. We represent 30,000 members nationwide, and our membership includes hunters, landowners and natural resource professionals.

The order would prohibit feeding wildlife or laying or placing any food, fruit, hay, grain, chemical, salt, or other minerals on the ANF for a period of one year. The National Deer Association (NDA) defines supplemental feeding as the act of placing quality food resources for the purpose of increasing dietary quality. Often times, supplemental feeding differs significantly from wildlife feeding, which is simply utilized for wildlife viewing opportunities. The practice of supplemental feeding and its role in deer management have grown in terms of controversy and complexity in recent years. The NDA acknowledges the available scientific data surrounding this issue is incomplete and, at times, inconsistent.

However, a major disadvantage of both wildlife and supplemental feeding is the risk of spreading disease. The purpose of the proposal is to help slow or stop the spread of chronic wasting disease (CWD) in white-tailed deer after the Pennsylvania Game Commission (PGC) announced that a deer from a Warren County hunting preserve tested positive for the disease. Wildlife feeding increases density around a single food source and therefore increases the potential for direct and indirect contact among individuals. Currently there are 12 deer diseases that are thought to be spread by direct contact, two of which are bovine tuberculosis (TB) and CWD. Other concerns include habitat impacts, migration disturbance and artificial increase in carrying capacity. Ultimately, the NDA supports providing adequate food and cover for deer through habitat management programs. The NDA does not support supplemental or wildlife feeding in known CWD and bovine TB areas or where this activity may disrupt natural migratory patterns of deer.

Thank you for your time and consideration. If you have any further questions or concerns, please contact me at (814) 574-8469 or torin@deerassociation.com.

Sincerely,

Torin Miller
Director of Policy