



NATIONAL DEER ASSOCIATION

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27 April, 2022

Virginia Department of Wildlife Resources
Attn: Policy Analyst and Regulatory Coordinator
P.O. Box 90778
Henrico, Virginia 23228

RE: Comments on Proposed Regulations Pertaining to Chronic Wasting Disease

Dear Virginia Board of Wildlife Resources:

On behalf of the National Deer Association (NDA), I am writing to provide our comments on the Virginia Board of Wildlife Resources' (Board) proposed changes to the Commonwealth's deer hunting regulations to help address chronic wasting disease (CWD) in Virginia. We are a national non-profit conservation organization with the mission to ensure the future of wild deer, wildlife habitat and hunting. We represent 30,000 members nationwide, including hunters, landowners and natural resource professionals.

The NDA appreciates the Boards' proactive and aggressive approach to managing CWD, including many of the proposed season changes intended to reduce deer density in specific Disease Management Areas (DMAs) and disease focus zones (DFZs) and keep disease prevalence rates low. We support the Virginia Department of Wildlife Resources' (DWR) efforts to increase testing and surveillance efforts in DMAs, DFZs and surrounding areas. We encourage convenient and quick testing options for hunters, and we also support mandatory testing in particular locations or during specific seasons.

The NDA is dedicated to ensuring the future of wild deer, wildlife habitat and hunting. The NDA outlines deer diseases as a critical focus area and slowing the spread of CWD is of primary concern. CWD is one of the largest threats to wildlife conservation that we have encountered over the last century. As many states have learned, slowing the spread of this always-fatal disease is a daunting task and early detection and rapid response once the disease is found is critical for long-term management. Through our extensive work on this issue across North America, we know that proactive, science-based management by state wildlife agencies is imperative to keeping prevalence rates low, deer populations healthy and hunter engagement stable.

CWD spreads most significantly through direct animal to animal contact and animal contact with prions in contaminated environments and continued and increased harvest of both antlered and antlerless deer is extremely important in CWD-positive herds. The NDA supports the majority of the Boards' proposed changes to increase harvest of primarily antlerless deer in certain counties in DMAs 2 and 3 and in designated disease focus zone(s) in Carroll County. Specifically, we support the proposed September early antlerless seasons in Page and Carrol Counties. This added opportunity in Page County brings regulations more in-line with other DMA2 Counties, and the addition in Carroll County should aid the DWR in determining disease prevalence near recent detections and slowing further spread. Early antlerless-only hunts are popular among hunters and typically provide nice-weather opportunities that more hunters take advantage of.

We also support the proposal to allow full season either-sex deer hunting on private lands in Page County during the early and late muzzleloader seasons. In addition to aligning regulations among counties and increasing disease sampling, this proposal tackles an important aspect of CWD management: harvest more deer, and specifically, more antlerless deer. Even though bucks contract CWD at higher rates than does, it is imperative to focus harvest effort on antlerless deer in a disease zone. 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 at least twice as many 2½-year-old and older does as bucks on the landscape. Finally, less than half of the hunters who go afield will shoot a deer in any given year, and only about 15 percent shoot more than one deer. So, we need to shoot bucks, but in disease zone, hunters should be shooting more adult does than bucks. Concurrent buck/doe firearms seasons should help achieve this goal. The proposal also expands hunter opportunity and choice – both important in keeping hunters engaged in the disease management process.

Similarly, we support the proposal to extend the firearms deer season from two to four weeks on private lands in Carroll County. This move would provide consistent general firearms seasons in all DMA3 counties, streamlining hunting regulations for those counties and minimizing confusion for hunters. We do note, however, that hunter support for this proposal is crucial to its success.

Finally, we have concerns about the proposed January through March late antlerless only deer seasons in multiple counties. Late antlerless-only seasons can be ineffective at increasing harvest to desired levels due to a lack of hunter participation. Additionally, the risk of shooting bucks that have shed their antlers is greatly increased, and overall hunter support can vary greatly. Certainly, increasing antlerless harvest in disease zones is necessary, but late seasons are often counterproductive to this goal unless accompanied with a strong educational campaign from the state wildlife agency. If harvest levels in existing counties with late antlerless only deer seasons are near objective, and if hunter support and appropriate education and outreach for these seasons exists, we would support the proposals to implement late antlerless seasons in other counties.

Undoubtedly, the deer hunting tradition and industry in Virginia has deep and widespread roots. Nationwide, about 80% of all hunters pursue deer, and research has shown that CWD prevalence discourages hunter participation, ultimately threatening our deer hunting traditions and the Pittman-Robertson model of conservation funding. Now is the time to use all resources at the disposal of the Board to work with hunters, landowners and other stakeholders to curb the spread of CWD in Virginia and keep prevalence rates low.

Please don't hesitate to reach out with questions or for more information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Torin Miller', with a stylized, cursive script.

Torin Miller
Director of Policy