



# NATIONAL DEER ASSOCIATION

P.O. Box 162305 · Atlanta, Georgia 30321 · phone: 1-800-209-3337 · [DEERASSOCIATION.com](http://DEERASSOCIATION.com)

25 July, 2022

USDA Forest Service  
C/O Andrea Hille  
4 Farm Colony Drive  
Warren, PA 16365

**RE: Comments Regarding USFS Wildlife Feeding Restriction Proposal on the Allegheny National Forest**

Dear Forest Service,

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 indefinitely restrict wildlife feeding on the Allegheny National Forest (ANF) in northwestern Pennsylvania. The 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 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. We supported the temporary restriction after the Pennsylvania Game Commission (PGC) announced in 2021 that a deer from a Warren County hunting preserve tested positive for the disease. We now support the indefinite restriction. 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](mailto:torin@deerassociation.com).

Sincerely,

Torin Miller  
*Director of Policy*