



NATIONAL DEER ASSOCIATION

P.O. Box 162305 · Atlanta, Georgia 30321 · phone: 1-800-209-3337 · DEERASSOCIATION.com

28 July, 2022

Missouri Department of Conservation
2901 W Truman Blvd
Jefferson City, MO 65102

RE: Comments Regarding Updated Goals and Objectives of the Draft CWD Surveillance and Management Plan and Proposed Changes to Deer Hunting Regulations

Dear Missouri Department of Conservation:

On behalf of the National Deer Association (NDA), I am writing to provide our comments in support of the Missouri Department of Conservation's (MDC) recently updated goals and objectives of the draft CWD Surveillance and Management Plan and proposed changes to deer hunting regulations. 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 MDC's proactive and aggressive approach to managing CWD, and we're pleased to see the CWD Surveillance and Management Plan and deer hunting regulations revisited and updated as we learn more about chronic wasting disease. 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.

Since CWD was first detected in the Missouri in 2010, the amount of information about CWD and CWD management in the state has expanded. The NDA supports the updated goals and objectives of the draft CWD Surveillance and Management Plan that reflect these new understandings. The five updated goals – Surveillance, Hunter service testing, Communication, Management and prevention, and Research – and their subsequent objectives will greatly aid MDC in discovering new CWD detections, engaging hunters in the disease management process, limiting the spread of CWD within and outside Missouri and discovering new science and techniques to manage the disease.

Similarly, the proposed changes to deer hunting regulations for the 2023 deer hunting season will help MDC manage CWD and assist the state in meeting deer management goals. The NDA supports the proposal to increase the maximum number of firearms antlerless deer hunting permits that a hunter could fill from two to four in select counties. Increased deer harvest is incredibly important in disease areas, and the increased harvest of antlerless deer, specifically, is important for a number of reasons. Antlerless deer are highly social, outnumber bucks and even disperse across the landscape. Additionally, a declining hunter base is shooting fewer deer per hunter, so it's important to encourage hunters to harvest more deer, and more antlerless deer, specifically. For these reasons, we also support the

proposal to create a three-day early antlerless portion of firearms deer season in select counties that would begin on a Friday in early to mid-October. Finally, we support the proposal to create a five-day CWD portion of firearms deer season in select CWD Management Zone counties that would begin the Wednesday before Thanksgiving. Firearms hunters in Missouri make up 93% of the state's deer hunters, and about 77% of Missouri's deer harvest is by firearm. The CWD-specific firearms season increases opportunity for the vast majority of Missouri hunters, and it also presents the most significant opportunity to increase deer harvest in targeted counties.

Undoubtedly, the deer hunting tradition and industry in Missouri 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. We encourage MDC to continue to use all available resources to work with hunters, landowners and other stakeholders to curb the spread of CWD in Missouri and keep disease 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