



NATIONAL DEER ASSOCIATION

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Mississippi Commission on Wildlife, Fisheries, and Parks
C/O Chairman William M. Mounger II
1505 Eastover Drive
Jackson, MS 39211

6 July, 2022

RE: Recently approved changes to Mississippi's CWD Management Plan's Chronic Wasting Disease Zone Delineation Tool

Dear Commissioners:

On behalf of the National Deer Association (NDA), I am writing to provide our comments in opposition to the Mississippi Commission on Wildlife, Fisheries, and Parks' (Commission) recently approved changes to Mississippi's Chronic Wasting Disease (CWD) Management Plan's Chronic Wasting Disease Zone Delineation Tool. 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 Mississippi Department of Wildlife, Fisheries, and Parks' (MDWFP) proactive and aggressive approach to managing CWD. We were supportive of MDWFP's proposed CWD Management Plan and applauded its ultimate adoption in 2021 by the Commission. 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.

In developing the state's CWD Management Plan, MDWFP spent significant time and energy developing and researching a plan based on the best available CWD management practices. MDWFP borrowed CWD management provisions from a number of southeastern and midwestern states that have been effectively managing the disease. Specifically, MDWFP borrowed a tool developed and instituted by the Arkansas Game and Fish Commission (AGFC) in Arkansas's CWD Management and Response Plan (also supported by NDA) that lays out the requirements for counties labeled as CWD-positive to shed that status. These requirements include time, distance and disease testing components. Under the previously-adopted plan, counties with a CWD positive sample inside the county or within 10 miles of its border were automatically placed in a CWD Management Zone (CWD-MZ) for a minimum duration of 3 years. After the three-year minimum inclusion in the CWD-MZ, counties were then assessed using the risk assessment tool developed by AGFC. The risk assessment tool assigned numerical values based on a number of risk components, including disease sampling and proximity to positive detections.

The Commission's recent decision to remove the distance and disease testing components is troubling, at best. Specifically, the Commission has elected to remove the 10-mile-radius provision and the

minimum sampling threshold, instead opting to institute a framework that only requires a county to have no positive CWD detections for 3 years before it can be removed from the CWD-MZ. This model is harmful in two ways: first, removal of the proximity component unnecessarily exposes the highest-risk counties to spread of CWD, and second, the removal of sampling requirements removes the incentive to sample. Instead, there is now an incentive to *not* sample. After all, no sampling results in less likelihood of disease detection, and thus, removal from the CWD-MZ. Both changes represent a step backwards for Mississippi's deer herd and the state's disease management program, and both changes ignore sound disease management principles proven effective in multiple CWD-positive states.

Undoubtedly, the deer hunting tradition and industry in Mississippi has deep and widespread roots. Nationwide, about 70% 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 MDWFP and the Commission to work with hunters, landowners and other stakeholders to curb the spread of CWD in Mississippi and keep prevalence rates low. We implore you to reconsider the recently adopted changes to the CWD Zone Delineation Tool.

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 flourish at the end.

Torin Miller
Director of Policy