



# NATIONAL DEER ASSOCIATION

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Tennessee Wildlife Resources Agency  
Wildlife Division  
5107 Edmondson Pike  
Nashville, TN 37211

25 January, 2023

## **RE: Proposed Chronic Wasting Disease Strategic Plan**

Dear TWRA Wildlife Division:

On behalf of the National Deer Association (NDA), I am writing to provide our comments in support of the Tennessee Wildlife Resources Agency's (TWRA) new five-year chronic wasting disease (CWD) strategic plan. 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 LDWF's proactive and aggressive approach to managing CWD, including the proposed CWD Response and Management Plan (Plan), which will serve as a guiding document for TWRA staff and ensure the best science is applied in efforts to control the always-fatal 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.

The Plan's five main goals – Prevention, Surveillance and Monitoring, Response and Management, Research and Outreach and Communications – are all critically important focus areas in an exhaustive approach to managing CWD. We support these overarching goals, and we also support many of the objectives, strategies and actions proposed to help TWRA reach these goals.

With respect to Prevention, we support the proposed strategies and actions to prevent the introduction or spread of CWD to areas where the disease has not been detected, including:

- Conducting post-season targeted removal in areas with isolated, low number of positive samples and/or in areas on the perimeter of the enzootic area;
- Limiting the unnatural concentrations of free-ranging cervids resulting from supplemental feeding practices;
- Supporting the Tennessee Department of Agriculture's captive cervid industry regulations as appropriate, including fencing, live movement prohibitions near CWD detections, enhanced surveillance, and CWD-free accreditation requirements; and
- Maintaining and reevaluating, as necessary, TWRA's existing CWD and disease rules and regulations.

With respect to Surveillance and Monitoring, we support the proposed strategies and actions to maximize the probability of early detection in areas where CWD has not been detected and the monitoring of prevalence and geographic distribution of CWD in areas where it has been detected, including:

- Collaborating with border states on surveillance efforts near borders;
- Collecting and consistently reporting prevalence data at, but not limited to, the county level scale;
- Ensuring staff are fully equipped to conduct CWD sampling; and
- Continuing to incentivize the submission of CWD samples by taxidermists and processors especially in areas where CWD has not been found.

With respect to Response and Management, we support the proposed strategies and actions to minimize and mitigate the impacts of CWD where the disease has been detected and proactively respond to detections in novel areas, including:

- Conducting prescribed communications actions to confirm and distribute accurate information of initial detections;
- Adjusting county-level CWD sampling quotas in the newly affected area to begin monitoring disease prevalence and understand the extent of the disease; and
- Evaluating management actions applied in an affected area after a five-year period and consider removing or adding management actions as warranted.

With respect to Research, we support the proposed strategies and actions to optimize the contribution of research to TWRA's CWD programs, including:

- Measuring free-ranging cervid movement patterns to understand the likely natural spread of CWD to inform the risk-based surveillance model and the spatial scale at which to apply CWD management actions more accurately;
- Exploring opportunities to support or conduct research for the development of novel CWD detection methods;
- Administering a periodic statewide survey to measure knowledge, attitudes, perceptions, and support for management actions related to CWD; and
- Develop partnerships with universities and other agencies that have common goals in CWD research.

Finally, with respect to Outreach and Communication, we support the proposed strategies and actions to educate the public, partners, and all TWRA staff, about CWD including:

- Distributing CWD informational and educational materials in multiple formats;
- Developing and implementing CWD 101 training programs for TWRA and making the program available to partner agencies;
- Evaluating methods to increase hunter recruitment and retention in CWD-affected areas;
- Continuing to provide CWD service testing (at no cost to the hunter) for hunter harvested deer;
- Continuing to provide incentives to keep hunters harvesting deer; and
- Ensuring that CWD-related hunting regulations are easily understood.

The above lists are not exhaustive of the provisions we support in the Plan, but we believe they are of particular importance. Undoubtedly, the deer hunting tradition and industry in Tennessee has deep and widespread roots. Nationwide, about 80% of all hunters pursue deer, and research has shown that CWD prevalence can discourage 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 TWRA to work with hunters, landowners and other stakeholders to curb the spread of CWD in Tennessee and keep prevalence rates low.

We look forward to assisting TWRA with implementation of the proposed Plan, and welcome any questions you may have regarding our position.

Sincerely,



Torin Miller  
*Senior Director of Policy*