

28 January, 2021

Mr. Andrew Parker, Commission Chairman  
Arkansas Game and Fish Commission  
2 Natural Resources Drive  
Little Rock, Arkansas 72205

Mr. Pat Fitts, Director  
Arkansas Game and Fish Commission  
2 Natural Resources Drive  
Little Rock, Arkansas 72205

Dear Chairman Parker and Director Fitts,

We, the undersigned organizations, representing millions of hunters, conservationists, and wildlife professionals nationwide, are writing to comment on the Arkansas Game and Fish Commission's (AGFC) Chronic Wasting Disease Management and Response Plan for the years 2021-2025. We applaud AGFC's leadership and proactive approach to managing CWD in Arkansas, and we encourage AGFC to continue to follow national best practices to manage the spread of chronic wasting disease (CWD) in the state.

Specifically, we request that the Commission follow recommendations by AGFC biologists to prohibit the recreational feeding of wildlife year-round in the CWD Management Zone due to the risk of increased CWD transmission. However, we request that the Commission also restrict baiting *year-round on both public and private lands* within this Zone to further reduce the artificial congregation of deer. We also support the Commission's proposal to remove the current antler point restrictions (APRs) in the CWD Management Zone.

CWD is an always-fatal brain disease affecting members of the deer family (cervids). Natural infections have been found in wild and captive deer, elk, and moose throughout North America. The disease is caused by prions (misshapen proteins) that create holes in the brain and eventually lead to death. There is currently no vaccine or treatment. The recent and rapid spread of CWD to 26 states presents a fundamental, persistent, and growing threat to the health of wild cervid populations and the outdoor recreation and conservation interests that depend on them. It is unquestionably one of the largest threats to wildlife conservation that we've encountered over the last century.

First discovered in Arkansas in wild elk and deer in 2016, CWD-positive individuals have since been identified in 14 northern Arkansas counties. Early sampling efforts near the first positive detections showed a local prevalence rate of 23%, but the detected prevalence rate for the 14 positive counties since 2016 is 3.3%. The proposed hybrid response and management plan serves as the guiding document for the agency's intended response to the detection of CWD in areas and outlining the agency's ongoing management of the disease in areas where it is known to occur.

CWD spreads most significantly through direct animal to animal contact and animal contact with prions in contaminated environments. The Association of Fish and Wildlife Agencies (AFWA) released a [technical report on best management practices for CWD](#), which recommends a ban on supplemental feeding. This recommendation stems from scientific evidence documenting that

baiting and feeding (including mineral licks) cause an unnatural concentration of cervids around bait sites that are additive to natural food sources and facilitate the spread of infectious CWD prions through increased animal to animal contact and contact with contaminated surfaces and soil. There is no doubt among the CWD research community that unnatural concentrations of wildlife can efficiently spread CWD in infected cervid populations. The Arkansas CWD Management and Response Plan mostly follows these best management practices by prohibiting recreational feeding in the CWD Management Zone but could, and should, go a step further by doing the same with respect to baiting.

Continued and increased harvest of both antlered and antlerless deer is extremely important in CWD-positive herds. Five years of data from 10 counties in Arkansas' CWD Management Zone shows that removing APRs has not negatively impacted antlerless harvest or buck age structure. Rather, removing APRs has aided hunters in harvesting more deer of both sexes, increasing the overall harvest in those counties. With the increased harvest, removing APRs has potentially helped limit the spread of CWD both within and outside the counties. Even more, AGFC data shows that 0.5 and 1.5-year-old bucks in the CWD Management Zone have uniquely high disease prevalence (25-29%). These prevalence rates are higher than all other known prevalence rates in young male deer nationwide. Certainly, increased harvest and bag limits follow national best practices, and the data in Arkansas shows that the removal of APRs is an effective tool for achieving population objectives and slowing dispersal while maintaining engagement and satisfaction of hunters. An engaged and satisfied hunter-base is a crucial component of disease and deer management in any state.

As many states have learned, limiting the spread of CWD is a daunting task and early detection and rapid response once the disease is found is critical for long-term management. Adhering to strict best management practices, like those outlined by AFWA, is key to slowing the spread of CWD in Arkansas's wild deer and elk herds. We strongly ask that you continue to follow the national best practices, including prohibiting supplemental feeding and baiting year-round on both public and private lands, in the CWD Management Zone.

Sincerely,

Congressional Sportsmen's Foundation  
Conservation Federation of Missouri  
Mississippi Wildlife Federation  
National Deer Association  
National Wildlife Federation  
Theodore Roosevelt Conservation Partnership