



## GEORGIA WILDLIFE FEDERATION®

May 23, 2018

Chairman Aaron McWhorter  
Georgia Department of Natural Resources Board  
2 Martin Luther King Jr. Drive, SE  
Suite 1252  
Atlanta, GA 30334

RE: EXECUTIVE ORDER - EXPANSION OF SHOOTING DEER OVER BAIT

Chairman McWhorter and Georgia DNR Board,

An Executive Order was signed by Governor Deal on April 9, 2018 directing the Georgia Department of Natural Resources to “evaluate and determine an appropriate expansion of the Southern Zone (*as it relates to shooting deer over bait*) and present such findings to the Board for action based on **sound wildlife management principles.**” Governor Deal and his administration have done remarkably good work in protecting and conserving lands for future generations and have provided funding for wildlife conservation through enhanced fees on hunting and fishing licenses. However, this Executive Order is counter to “sound wildlife management principles”, is contrary to virtually all peer reviewed wildlife science and is bad for hunters, hunting and our deer herd.

The community of wildlife professionals, in as close to unanimity as one can get in science, is opposed to baiting of wildlife in all but a few exceptions. One will be hard pressed to find any “sound wildlife management principle” that supports sport shooting deer over bait. Wildlife experts in our own state have historically opposed baiting deer. Additionally, the methodology embodied in the Executive Order process ignores decades of successful wildlife management by professionals.

No less than three legislative initiatives to expand the killing of deer over bait were attempted in the 2018 General Assembly, none of which were able to receive the necessary consensus for passage. It seems odd that immediately following a session where the Legislature could not/would not deal with the issue, and when engagement from the Department’s wildlife professionals was conspicuously absent, you are faced with a very unusual attempt through an Executive Order to impose expanded baiting.

In the face of consistent professional opposition to hunting deer over bait, Georgia has traditionally dealt with the shooting of deer over bait as a legislative matter. As suggested by the Executive Order’s reference to HB 277 from 2011, shooting deer over bait was approved in a portion of the state by the General Assembly despite long-standing concerns by Georgia’s wildlife professionals.

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The Executive Order maintains Georgia has seen no evidence of impact to deer herd health or harvest numbers. It implies there is no direct link to disease vectoring via baiting. The Order fails to explain that seldom does one make such findings about deer health unless one is looking for those things. DNR has specifically not looked for any linkage to deer herd health since 2011. Furthermore, research shows the concentration of animals in small areas such as bait stations leads to more rapid transmission of diseases such as Chronic Wasting Disease and Bovine Tuberculosis. Baiting doesn't cause these diseases, but it certainly does facilitate the rapid spread of disease.

Contrary to the Order's position, the majority of professional peer reviewed science indicates there is a decrease in deer harvest with killing over bait. Some research even shows a reduction in hunter efficacy because the deer become more nocturnal. Georgia's harvest numbers from the 2011-12 deer season and the 2012-13 deer season appear consistent with those findings (subsequent years contained other variables and were not reliable for extrapolation).

The Executive Order states that "In 2011, HB 277 was enacted providing a framework for hunters in this state practicing supplemental feeding". This misstatement appears to be an attempt to distract from the issue of hunting deer over bait. Supplemental feeding rules for deer were not changed by HB 277 and were an option legally afforded for deer management throughout the state, and it continues to be an option. Wildlife professionals make clear distinction between supplemental feeding and baiting.

By the Executive Order's own reference, there exists an inequity between the northern and southern zone hunters. This inequity, however, is not the result of professional wildlife management recommendations associated with deer population and abundance. As such, it should be abundantly clear that this is NOT a sound wildlife management principle, but rather a social/political issue.

Deer are browse animals, unaccustomed to a diet of corn, which is by far the most predominant bait used. High consumption of corn can be harmful to deer. Furthermore, the huge amounts of corn in the landscape associated with killing deer over bait brings challenges with nuisance wildlife such as raccoons, opossums, and even promotes expansion of feral hog populations. Consider that this proposal includes areas in north Georgia, where DNR even discourages backyard bird feeders for fear of habituating bears to people. Property owners will have no protection from nuisance wildlife problems created by aggressive baiting by their neighbors. Different land use patterns in North Georgia of smaller tracts, national forests, more roads, and more people exacerbate potential conflicts for the hunting community and landowners.

In short, the shooting of deer over bait is bad for hunters, hunting and our deer herd. Surveys indicate the general public objects to baiting; therefore the Executive Order is certainly not a recipe for recruiting new hunters or in advancing our hunting heritage. Hunters become dependent upon bait stations rather than

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understanding and appreciating their quarry. Deer have to deal with a non-native feed, they are subject to rapid expansion of disease, and they may exceed the carrying capacity of the land. Studies indicate increased deer/car collisions in areas where baiting is practiced because deer become more nocturnal, they become more concentrated near roads (where bait stations tend to be deployed), and they may become habituated to humans. Studies also indicate baiting concentrates predators around bait stations and baiting certainly encourages the expansion of nuisance and invasive animals.

We, the undersigned, encourage you to critically consider the impact of how you implement this Order. Consider the science and the "sound wildlife management principles" that it ignores. Perhaps even ask yourself why professional wildlife biologists are not the ones recommending baiting. Ignoring any principle of sound wildlife management, this proposal damages the integrity of our Department by disregarding wildlife professionals and by usurping our own 2015-2024 Georgia Deer Management Plan; a plan developed through broad scaled public input and approved by Commissioner Williams.

We encourage you to join with us in opposition to the expansion of killing deer over bait.

Respectfully Submitted,



Mike Worley

President & CEO

Georgia Wildlife Federation

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Todd Holbrook  
Retired Deputy Commissioner  
Georgia Department of Natural Resources



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Dan Forster  
Retired Director, Wildlife Resources Division  
Georgia Department of Natural Resources



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David Waller  
Retired Director, Wildlife Resources Division  
Georgia Department of Natural Resources



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Larry McSwain  
Retired Assistant Director, Wildlife Resources Division  
Georgia Department of Natural Resources



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Kevin McKinstry  
Recreation Manager/Certified Wildlife Biologist  
The Westervelt Company

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#### Enclosures

- IMPACT STATEMENT HB448
- IMPACT STATEMENT HB1175
- LEGISLATIVE IMPACT STATEMENT HB1233
- LEGISLATIVE IMPACT STATEMENT HB1285
- AGENCY BRIEFING Hunting Deer over Bait
  - Hunting White-Tailed Deer Over Bait
- TWS Technical Review 06-1 Baiting and Supplemental Feed of Game Wildlife Species (by reference: <http://wildlife.org/wp-content/uploads/2014/05/Baiting06-1.pdf>)
- 2015-2024 Georgia Deer Management Plan (by reference: [http://georgiawildlife.com/sites/default/files/wrd/pdf/management/2015-2024\\_Deer\\_Management\\_Plan.pdf](http://georgiawildlife.com/sites/default/files/wrd/pdf/management/2015-2024_Deer_Management_Plan.pdf))