

September 14, 2015

Mississippi Commission on Wildlife, Fisheries and Parks
1505 Eastover Drive
Jackson, MS 39211

Dear Commission on Wildlife, Fisheries and Parks:

The proceeding list of conservation-based organizations strongly oppose shooting deer over bait, whether in line of sight at a specified distance from the bait site or otherwise because of the following biological, social, and ethical concerns and justifications. For clarity, baiting implies the shooting of game over an artificial food source, whether dispersed via a mechanical feeder or otherwise. Although the proposal does not define the ability to shoot deer over supplemental feed as baiting, there can be no mistake that it is indeed baiting. Hereafter, we will simply note baiting as the terminology that reflects the line-of-sight shooting of game over an artificial food source, except where pertinent to the reference.

The proposed change is not consistent with science-based data regarding the effects of baiting on wildlife populations. A great number of science-based studies have documented numerous reasons why baiting should be prohibited. The Wildlife Society (TWS) with more than 9,000 members consisting of wildlife professionals, biologists, and researchers, developed a Position Statement on "Baiting and Supplemental Feeding of Game Wildlife Species (2007)" that lists nine reasons that baiting and/or feeding of game species jeopardize the health and well-being of our wildlife populations. The concerns include, but are not limited to, the concentration of wildlife increasing disease transmission, habitat destruction, wildlife predation, altering natural behavior, and a general redirection of resources from quality habitat management.

Baiting also impacts a broad diversity of wildlife, not only deer. From song birds to wild hogs to a suite of predators, baiting sites attract multiple species not meant to interact at the frequency these concentrations promote. There are over a hundred scientific references illustrating the threats to wildlife and to wildlife habitats as a result of baiting. Potential ramifications include increased predator and wild hog concentrations and the increased likelihood of wildlife

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management issues occurring because of infectious disease transmissions and changes in habituation to humans and feeding habits. For example, since the 2008 vote to allow supplemental feeding, wild turkey populations in Mississippi have been progressively declining. Turkey hunter success has also declined. Multiple factors can affect turkey populations including increased incidence of disease, increased nest predation, and poor nutrition. Considering that baiting sites contribute to increased disease transmission, greater concentrations of predators, and provision of unnatural wildlife food with high concentrations of aflatoxins, declines in Mississippi's turkey populations may be directly related to increased "deer corn" distribution.

Baiting of wildlife is not a cornerstone of wildlife management. It has been proven by study after study that improved habitat management yields the greatest benefits to deer, wild turkeys, and other wildlife, and is much less costly than baiting and supplemental feeding. When it is legal to bait and

♀ supplemental feed, these facts are often ignored for the hope of quick, short-term results. The limited resources that many landowners could invest in long-term habitat improvement are instead expended on purchase of feeders and bait which have been proven not to provide long-term benefits. Instead, these activities seriously threaten the future of fair-chase hunting and wildlife management.

Leaders in other states have taken responsible initiatives in addressing baiting based on wildlife biological data. Just recently, the Virginia Commission on Game and Inland Fisheries developed a detailed scientific report to the Virginia Legislature defeating an attempt to make baiting and supplemental feeding of deer legal. The justification they utilized was based predominantly on the biological justification delineated in the TWS Position Statement. Additionally, the West Virginia Division of Natural Resources (WDNR) on July 1, 2015 repealed the legality of baiting and supplemental feeding in seven counties because of the increasing threat of infectious diseases. A WDNR news release stated, "Current research indicates that supplemental feeding and baiting of deer increases the chance of disease transmission far above the normal clustering of deer on natural and agricultural feeding areas. Lowering encounter rates between infected and non-infected animals by prohibiting artificial supplemental feeding and baiting are generally accepted management practices for slowing the spread of an infectious disease among wildlife." It should be noted that similar prohibitions have also recently occurred in Michigan, Wisconsin, and other states where chronic wasting disease and other infectious diseases are continually increasing.

It has been proven that legalized baiting will not increase deer harvest, even

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though some hunters think otherwise. In fact, an 8 year research study in South Carolina found that in areas where baiting was prohibited, hunters harvested 28% more deer per square mile and spent less time afield. The study also observed that it required nearly 3 times as much effort to harvest a deer on areas where baiting took place (3.37 man-days/deer) compared to areas where baiting was prohibited (1.16 man-days/deer). Numerous baiting studies have revealed that deer (especially bucks) are more likely to become nocturnal, be more selective in feeding habits, and more easily avoid hunters when baiting is allowed. In contrast to what some hunters suggest, baiting does not and will not increase hunter success, nor will it improve deer harvest rates, which negates the argument that baiting will improve hunter success and promote population management.

The proposal has important social ramifications that were not considered as well. The reported justification for changing existing baiting and feeding regulations was supposedly based on a survey conducted by Responsive Management that surveyed resident and non-resident hunting license holders. By only surveying hunters, the survey was biased because the results do not reflect the opinions of the public at large. Because wildlife resources of Mississippi are "Public Trust Resources", the public's opinion on this issue should be considered before such proposed changes in regulations are considered. The survey data states that 52% of license holders approved of shooting deer over bait, and that 37% of hunting license holders strongly or moderately "disapproved" of allowing the shooting of deer over bait. The survey's summary further suggests that if only resident hunters were included, there would be greater opposition to hunting over bait as the summary clearly states that, "...non-residents were more likely to strongly approve of shooting deer over bait than were resident license holders." Therefore, Mississippi hunters have greater opposition to hunting their wildlife resources over bait than do non-residents. In addition, a majority of respondents from the Delta region actually disapproved of shooting deer over bait, and as noted numerous times in the text and summary of the survey data, "there is no consensus...suggesting that hunters are polarized on this issue..."

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The proposed regulation change has further implications on the future of hunting and conservation of wildlife resources in Mississippi. Recent nationwide surveys of Americans highlight negative public views and opinions of shooting deer or other wildlife over bait as these activities reduce the social acceptance of hunting. For example, a national survey of Americans titled "Trends in Approval and Disapproval of Hunting (American adults nationwide)" conducted in February 2015 reported that although 77% of Americans approve of fair-chase hunting, only 27% approved of hunting over bait (Responsive Management 2015). With hunter recruitment from the ranks of young people being a

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high priority as hunter numbers have declined over time, the baiting of deer, which the great majority of Americans do not feel is fair-chase, weakens public support for hunting, as well as for wildlife conservation and management programs. Hunting deer over bait clearly jeopardizes the continued acceptance of hunting by an increasingly skeptical public.

The Commissioners are appointed as leaders for conserving and managing Mississippi's Public Trust wildlife resources. At their disposal is a suite of wildlife professionals ranging from state and federal agency employees to leading researchers, biologists and land managers vested in Mississippi. From this pool of knowledge, science-based decisions can be developed for promoting Mississippi's wildlife resources for the benefit of Mississippi residents and for public trust wildlife populations and habitats. It is from this perspective that the following organizations and their members respectfully and collectively oppose strongly the proposal to allow the harvest of wild game over bait which would threaten the overall health of our wildlife populations, fair-chase hunting and wildlife conservation in Mississippi. Mississippi's citizenry and treasured public trust wildlife resources have nothing to gain from shooting deer over bait; instead Mississippi has everything to lose.

Sincerely,

Mississippi Wildlife Federation
Mississippi Chapter of The Wildlife Society
Jackson Audubon Society
Coalition for Ethical Deer Hunting
Anderson-Tully Corporation
Mississippi Ornithological Society
Safari Club International – Magnolia Chapter
Southeastern Section of The Wildlife Society
Forest Investment Associates
Mississippi Cattlemen's Association
Weyerhaeuser Company
Rocky Mountain Elk Foundation, Central MS Chapter
Tara Wildlife
National Wild Turkey Federation, Mississippi Chapter

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