



NATIONAL DEER ASSOCIATION

P.O. Box 162305 · Atlanta, Georgia 30321 · phone: 1-800-209-3337 · DEERASSOCIATION.com

St. Louis County Planning Commission

28 June, 2022

C/O Jenny Bourbonais
Land Use Manager
201 South 3rd Avenue West
Virginia, MN 55792

RE: Comments Regarding Proposed Amendments to the St. Louis County Zoning Ordinance 62

Dear St. Louis County Planning Commission:

On behalf of the National Deer Association (NDA), I am writing to state our support for the proposed amendments to the St. Louis County Zoning Ordinance 62 that would prohibit new or expansion of existing cervid farms in St. Louis County. 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, and our membership includes hunters, landowners and natural resource professionals.

Deer farming or cervid propagation is the raising of native or exotic cervid species for pleasure or commercial production of antlers, venison, breeding stock, semen, or other salable parts. Cervid propagation has grown rapidly in North America over the past few decades. About 40 states and several Canadian Provinces permit cervid propagation, although regulations vary. Captively propagated cervids in North America include fallow deer, red deer, white-tailed deer, elk, sika deer, and axis deer. Because of the potential negative effects, several states and some Canadian provinces have banned this practice. The most common concern is the introduction of novel diseases, such as chronic wasting disease (CWD), from captive cervids to native wildlife and domestic livestock. The NDA opposes captive propagation of deer and other cervids.

CWD is an always-fatal brain disease affecting members of the deer family (cervids), with natural infections having been found in white-tailed deer, mule deer, elk, moose and reindeer. CWD belongs to a group of diseases known as transmissible spongiform encephalopathies (TSEs). Within this family of diseases, there are several other variants that affect domestic animals such as scrapie, which has been identified in domestic sheep and goats for more than 200 years, bovine spongiform encephalopathy (BSE) in cattle (mad cow disease), and transmissible mink encephalopathy in farmed mink. CWD is highly contagious, and the infectious agent known as prions may be passed in feces, urine, blood, semen and saliva. Recent research suggests that infected prions can also bind to soils and vegetation where it can be later taken up by animals. Experts believe prions can remain in the environment for several years – if not decades – so other animals can contract the disease even after an infected animal has died. There is no evidence that CWD can be transmitted to people despite thorough attempts to find a link to similar human diseases, such as Creutzfeldt-Jakob disease and Alzheimer's disease. However, the Centers for Disease Control (CDC) recommends that people do not eat venison from animals that have tested positive for the disease.

There is currently no vaccine or treatment. Infected animals with clinical symptoms become emaciated and exhibit abnormal behavior including lack of fear of people, drastic weight loss, stumbling, listlessness, and loss of bodily functions. However, the average incubation period is 18-24 months, and it may take more than two years for an infected animal to develop symptoms. So, most hunters will never see a deer with these symptoms. Infected individuals overwhelmingly perish from other causes. CWD-



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positive animals are more likely to succumb to predation, hunters or car collisions than non-infected animals, and research shows they die at 2-3 times the rate of deer without the disease.

Throughout 2021 and in the first half of 2022, we have seen CWD spread both in Minnesota and throughout the country. Nationwide, four new states detected CWD in their deer herds, bringing the national total to 30 and dozens of counties in multiple states also had their first positive detections. We've also witnessed concerning 'missteps' in captive cervid facilities nationwide, including significant regulatory infractions in Minnesota that directly exposed wild deer and public lands to CWD. Undoubtedly, the wild deer hunting tradition and industry in Minnesota have deep and widespread roots, and the deer hunting in Minnesota is so much larger than the act. It's comradery, coming-of-age, connecting to nature, with our food and with ourselves, and of course, the creation of life-long memories and stories. It is no exaggeration to say that all of these emotions, experiences and benefits are put at risk by the presence of CWD in wild deer herds. Multiple scientific studies have confirmed population declines over time in white-tailed deer, mule deer and elk populations from CWD.

Again, and for these reasons, the NDA supports the proposed amendments to the St. Louis County Zoning Ordinance 62 that would prohibit new or expansion of existing cervid farms in St. Louis County. We applaud St. Louis County's proactive and thoughtful work in managing the threat of CWD. Further, we support the County's inclusion of hunters and other stakeholders in the planning and disease management process.

Sincerely,

Torin Miller
Director of Policy