



LOUISIANA WILDLIFE FEDERATION

The voice of Louisiana's wildlife and natural resources since 1940.

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August 4, 2025

Mr. Johnathan Bordelon
LDWF Deer Program Manger
Louisiana Department of Wildlife and Fisheries
1995 Shreveport Highway
Pineville, La., 71360

via e-mail to jbordelon@wlf.la.gov

RE: NOI to amend the LDWF Chronic Wasting Disease Control Areas

Dear Mr. Bordelon and LWF Commissioners

Louisiana Wildlife Federation (LWF) is providing written comment on the Notice of Intent (NOI) to modify LAC 76: V.137, to amend the Louisiana Department of Wildlife and Fisheries (LDWF) CWD Control Areas by reducing the portions of the existing Control Area where supplemental feeding and baiting is prohibited and adding new areas to the Control Area due to a recent CWD confirmed case found in a harvested white-tailed deer in Catahoula Parish.

LWF supports LDWF in its efforts to apply the best scientifically based strategies for controlling the spread of CWD in Louisiana. As such, **LWF is not in favor of the proposed NOI to create additional buffer zones within the control area framework.** LWF strongly believes that the Emergency Declaration (ED) that maintains the original 25-mile radius control zone model is the best solution for managing the spread of this disease moving forward. While LWF is sympathetic to the economic concerns presented by certain industry representatives, we do not believe these concerns outweigh the need for LDWF to stay consistent with the best management practices outlined in the Louisiana Action Plan. It is our position that the proposed buffer zones are not supported by science and are a short-term solution. LWF believes that amending the current control zones will ultimately result in a faster spread of the disease, which in the long run, will prove to be more harmful to the overall economic benefits currently provided.

In addition to the lack of science behind the recommendation, we feel the transition to the buffer zone proposal will create exponential problems related to the enforceability of these regulations. While the current 25-mile control zone already demonstrates considerable challenges for the effective enforcement of the rules, the addition of the proposed buffer zones will only amplify these challenges, as future positive animals are potentially discovered. As new zones are overlayed with existing zones, the buffer zone strategy will ultimately create a patchwork landscape that can neither be effectively regulated nor serves a useful scientific purpose.

LWF supports this comprehensive review of the rules and regulations that are put into place to best serve the natural resources of our state. We recognize the State of Louisiana for their leading efforts to have strong restrictions and protections for our native species.

This proposal, however, is not recognized as providing the best possible protection for our wildlife resources, particularly those species that are facing the greatest management challenges. LWF representatives have attended and provided comment at both public meeting events on the proposed NOI changes, in support of LDWF and their efforts to effectively manage this disease with sound scientific solutions. We applaud LDWF's efforts to engage the public on the issue in a manner that best assists them in understanding the science behind the current management practices.

While current steps, demonstrated in the ED, are recognized as positive measures for the control of the spread of CWD, we continue to draw attention to challenges faced by LDWF from LDAF and the captive cervid industry. LWF urges the Louisiana Department of Agriculture and Forestry (LDAF) to implement aggressive surveillance, best practices for testing, and transparent public reporting about past, present, and future cases of Chronic Wasting Disease (CWD) in the captive cervid locations and populations that they regulate and provide better coordination with the Louisiana Department of Wildlife and Fisheries in response to comprehensive mitigation measures.

LWF understands that deer hunting activities have a huge retail economic impact, as well as a positive impact on hunting property values, both of which would be diminished if CWD continues to spread in Louisiana. For that reason, we support maintaining the management structure offered under the DE and additionally urge LDAF to acknowledge that this disease has the potential to affect all cervids in Louisiana, both wild and captive animals, equally.

Louisiana Wildlife Federation is a statewide, nonprofit organization that represents 23 affiliate organizations and more than 11,000 members dedicated to the conservation of Louisiana's wildlife and natural resources. For the reasons detailed in our comments, **LWF respectfully opposes the proposed NOI and urges the LWF Commission to maintain the current 25-mile control zone framework already established under best management practices.**

As an appointed representative of the recently created Legislative CWD Task Force, LWF looks forward to continuing efforts to find ways to combat and manage this disease and the potential negative consequences it poses for our communities.

We thank you, and the LWF Commissioners, for your consideration of these comments.

Sincerely,



Rebecca Triche
Executive Director
Louisiana Wildlife Federation