

**Boone and Crockett Club * Campfire Club of America * Mule Deer Foundation * Orion-The
Hunters' Institute * Pope and Young Club * Quality Deer Management Association * Rocky
Mountain Elk Foundation * Safari Club International * The Wildlife Society *
Whitetails Unlimited * Wildlife Management Institute**

Dear Administrator Smith:

The undersigned organizations are submitting this letter to voice their concern regarding an issue that threatens the future health and management of free-ranging white-tailed deer in the state of Wisconsin. On May 24, 2011 a premise-plan agreement between the USDA-APHIS-Veterinary Services and the current owners of a depopulated, chronic wasting disease (CWD)-contaminated deer farm in Portage County, Wisconsin will expire. This agreement requires the property owners to maintain a deer-proof fence that, up to now, has served to protect local, free-ranging white-tailed deer from the CWD-contaminated environment enclosed on the property. While 12 counties in Wisconsin have documented CWD in their wild white-tailed deer populations, the disease has yet to be detected in the free-ranging deer of Portage County.

Unfortunately, the highest prevalence of CWD in any captive-cervid herd depopulated in either the U.S. or Canada was documented within the confines of the property in question. Given that current research has shown that the active agents of CWD, prions, can persist in soil and remain infectious for a minimum of 3 years and potentially much longer, it is of supreme importance that the wild white-tailed deer residing near the facility be protected from the contaminated grounds until an effective CWD decontaminate can be developed and applied.

In addition to placing the facility up for sale, the current owners have indicated their intention to remove the fence after the aforementioned agreement with the USDA-APHIS-Veterinary Services has expired. We believe any removal or reduced integrity of this fence represents a significant threat to spreading CWD within Wisconsin. As environmental transmission of CWD has been previously documented in deer herds housed within Colorado research facilities, the potential for wild deer to become infected through exposure to the contaminated soils of the Portage County facility is very high. If such exposure and subsequent disease transmission occurs, it could rapidly advance the spread of CWD within Wisconsin and significantly compound the CWD management challenges already burdening the state.

The agreement signed between the USDA-APHIS-Veterinary Services and the property owner has the following clause within it:

“USDA/APHIS/VS may review and modify the premises plan as necessary based on the initial and subsequent site visits or test results, or in response to changes in the situations of the herd or premises, and as new information, advanced technology, and increased understanding about CWD becomes available,”

Our organizations believe the rapidly growing volume of scientific knowledge and management experience related to CWD, as well as other prion diseases such as scrapie, provide clear cause for concern for the persistence of environmental contamination and the likelihood of infection if CWD-free white-tailed deer gain access to this property. We respectfully request that the USDA-APHIS-Veterinary Services modify the premise plan to ensure the deer enclosure fence remains in place until such time that the enclosed lands be scientifically shown to no longer pose a threat of CWD infection to free-ranging deer.