



12 November 2018

Mr. J. D. Strong, Director
Oklahoma Department of Wildlife Conservation
1801 N. Lincoln
Oklahoma City, OK 73105

Re: Oklahoma Chapter of The Wildlife Society Comments on ODWC and ODAFF
Chronic Wasting Disease Response Strategy

Dear Mr. Strong:

Thank you for the opportunity to submit comments on the ODWC and ODAFF Chronic Wasting Disease Response Strategy. The Oklahoma Chapter of The Wildlife Society is the state chapter of The Wildlife Society, which is a non-profit professional society representing over 10,000 wildlife biologists and managers dedicated to the wise stewardship of wildlife resources through science-based management and conservation.

Chronic Wasting Disease (CWD) is a major threat to the health of our wild cervid populations in the state. Management and control of CWD is a major concern of professional wildlife biologists and we appreciate the cooperative effort of ODWC and ODAFF to address CWD issues in the state through their Chronic Wasting Disease Response Strategy.

As pointed out in the document, CWD research and management is very dynamic. New research results and information continue to enlighten our understanding of CWD transmission, control, and management. We are encouraged that ODWC and ODAFF recognize this and state they will modify and augment the plan as new information becomes available. An adaptive approach to CWD control and management is necessary for the State to implement an effective plan. Additionally, it is critical that this plan be based upon our current knowledge and understanding of CWD. As such, we applaud the State for using general frameworks for control and management of CWD as outlined in plans and recommendations of the Association of Fish and Wildlife Agencies (AFWA), the Western Association of Fish and Wildlife Agencies (WAFWA), the Center for Disease Control (CDC) U.S. Geological Survey (USGS), and the CWD Alliance as well as through consultation with fish and wildlife agencies from surrounding states (e.g., Arkansas and Texas). This plan must be based on the professional recommendations of these organizations to be defensible to the public.



In reviewing the plan, it is clear that ODWC and ODAFF incorporated the best available science and the current recommendations of AFWA, WAFWA, USGS, and Center for Disease Control in developing their response actions for detection of CWD in Oklahoma. The response actions are appropriate, sound, scientifically-defendable, and address most issues associated with CWD detection, management, and control. More specifically, the State's approach to surveillance of CWD is proactive and provides transparency in that citizens of the State will be informed in a timely manner. As public servants, it is critical any confirmed CWD detection be made public knowledge immediately. That said, we do have the following suggestions that could potentially improve prevention and management of CWD:

1. We are supportive of restrictions on wildlife feeding or baiting within positive selective surveillance areas or CWD infection zones, but restrictions should be in place year-round as opposed to only occurring outside the 15 September through January 15 period. The intent of restricting feeding and baiting is to reduce concentrating cervids in an area and thereby limiting transmission and establishment of CWD in areas where the CWD agent is present. Biologically, this practice is not justifiable if the goal is to limit CWD transmission. Further, this sends a message to the public that the state is not serious about CWD control or that CWD is not a serious threat if concentrated baiting is allowed in a CWD detection area. Finally, we recognize the long history and tradition of baiting and supplemental feeding in wildlife management, but baiting and supplemental feeding can often be detrimental to wildlife and we encourage ODWC and ODAFF to consider the short and long-term consequences of such practices when considering future baiting and feeding policies.
2. The current surveillance of captive facilities relies on voluntary producer participation. We certainly understand the sensitivity of this issue, but we also recognize that monitoring of all captive facilities provides the best management practice for isolating CWD and preventing the spread of CWD to wild cervid populations. ODWC and ODAFF should consider expanding their surveillance of captive facilities as this will allow the State to more effectively protect the public-trust species ODWC is mandated to manage.
3. The Selective Surveillance Area (SSA) approach will rely on a 10-mile radius circle surrounding the location of a CWD-positive animal. Based on past research from Noble Foundation that suggest white-tailed deer movements occasionally exceed 10 miles (we can provide the data), it may be more



appropriate to expand the circular area radius to at least 15 miles, possibly 20 miles. This larger buffer provides greater assurances that surveillance will detect additional CWD-positive animals.

4. We recommend prohibiting the importation of any part of a deer carcass including meat and bones from a CWD positive county or facility with the sole exception of finished taxidermy products. Meat, bones, associated lymph nodes and other body parts can contain CWD prions.
5. Require any live cervid imported into Oklahoma to be quarantined and tested for CWD before importation, regardless whether its origin is a known CWD positive county or facility. Prevention is the only realistic means to manage CWD problems.
6. The plan should state/communicate where and how an individual hunter can have his/her meat tested for CWD, especially for deer harvested outside Oklahoma.
7. The plan should require an effective high-fenced enclosure to be maintained around the Oklahoma County property where CWD was identified in 1998. Research has shown that prions remain viable for many years post depopulation. This requirement probably should be incorporated into the deed for the property. We do not want free-ranging Oklahoma deer to have access to this property. Again, prevention is the only realistic means to manage CWD problems.

Again, the Chapter appreciates the efforts of ODWC and ODAFF to address a serious wildlife issue in Oklahoma. Thank you for considering our input as wildlife professionals.

Sincerely,

Victoria Jackson

President, Oklahoma Chapter of The Wildlife Society