



**IDAHO DEPARTMENT OF FISH AND GAME**

600 S Walnut / P.O. Box 25  
Boise, Idaho 83707

C.L. "Butch" Otter / Governor  
Virgil Moore / Director

August 8, 2016

Brian Oakey, Deputy Director  
Idaho State Department of Agriculture  
2270 Old Penitentiary Rd  
P.O. Box 790  
Boise, Idaho 83701

Dear Brian:

Thank you for the opportunity to engage in Idaho Department of Agriculture negotiated rulemaking and provide comment on proposed rules regarding domestic cervidae (IDAPA 02.04.19) and importation of animals (IDAPA 02.04.21). We are providing these comments specific to proposed rules on requirements for notification of death, clarifying minimum surveillance requirements for chronic wasting disease, and clarifying requirements for tuberculosis testing. Idaho Department of Fish and Game (IDFG) staff was present at the July 27, 2016 meeting when Dr. Scott Leibsle discussed the proposed rule changes.

The mission of the IDFG is to protect, preserve and perpetuate the wildlife and fisheries resources in the state and to provide continued supplies of wildlife and fish for hunting, fishing and trapping. With reference to diseases, the primary concern of IDFG is the establishment of new or undesirable pathogens in free-ranging wildlife, including cervids. One of the driving forces behind the concern over diseases in free-ranging cervids is that once a disease becomes established, it becomes very difficult, if not impossible, for management actions to cure the effects of disease in wild, free-ranging animals.

Staff has reviewed the proposed rules and concludes they are consistent with our mutually compatible goals of preventing disease in domestic and wild cervidae. Our only comment is relative to the apparent interchangeable use "consigned for immediate slaughter" and "consigned directly to slaughter". Unless there is a substantive reason for the difference, we recommend a consistent use of terms to minimize confusion.

Sincerely,

  
Virgil Moore  
Director

cc: Dr. Mark Drew, Brad Compton  
VM:BC:clc

*Keeping Idaho's Wildlife Heritage*