

From: [William Miller](#)
To: [Lloyd Knight](#)
Subject: {External}Rule negotiations for domestic cervidae
Date: Wednesday, April 28, 2021 11:57:50 AM

----- Forwarded message -----

From: **William Miller** <elkrancher2@gmail.com>

Date: Wed, Apr 28, 2021, 10:50 AM

Subject: This is the email, I am sending personally to ISDA regarding the rule negotiations, please feel free to resend and or amend and send, so we as an industry, are actively participating in this negotiation.

To: Billy rasmussen <11brasm@gmail.com>, Jeff Lerwill <jeff@rockymountainelkranch.net>, Cindy Siddoway <cindy@junipermountain.net>, <george.m.kelley@hotmail.com>, <chasejones592@hotmail.com>

In an effort to concur with the governor and ISDA, I would currently support the majority of changes presented by ISDA at the April 21st rule negotiation.

I support the removal of section 020.02, reindeer limited to South of the salmon River.

I would like to see section 022.08, remain as an option for producers to still be allowed to use ranch specific identification.

I support the removal of section 050, Genetics, as there is currently no standard in which tests can be compared to.

I would like to see the removal of section 250.01 subsection a-b-c, as we are in a TB free state, and all of the animals imported are tested, this requirement is unnecessary and places an undue financial burden upon the producer.

I would like to see section 450.01 wording changed to "not required".

The above listed are in regards to the rules governing domestic cervidae.

In regards to the rules governing import of domestic cervidae, my concerns are as follows:

I would like to see section 600.03, amended to apply this requirement to the animals originating from East of the 100th meridian, as these animals are the subject of the intention of this requirement.

Section 601.02 is an unenforceable requirement, as there is no valid, verifiable test available.

I would not support the amendment to section 606.01, for traceback of source herds as a prerequisite to import. The herd owners have provided their history for 5 years and maintained their credentials to keep their status and eligibility for moving the animals. The source herd verification would only be necessary for an investigation to trace back and track down where the issue originated.

I would like to propose the insertion of a section that will replace the existing executive order, regarding the cwd endemic areas and the safe zone around them. I believe that 20 miles would provide the adequate safe zone, as opposed to the 25 miles in the current order. I realize there is no official study to establish this boundary with any level of certainty. But would like to see our requirement the same as our neighboring state of Utah.