

Chanel Tewalt

From: Dr. Scott Leibsle
Sent: Thursday, June 9, 2022 4:07 PM
To: Lloyd Knight
Cc: Chanel Tewalt
Subject: Fwd: Rulemaking - IDAPA - Domestic Cervidae

Please add to the Cervidae rule making record.

Scott R. Leibsle DVM, DABVP (Eq)
State Veterinarian/Administrator - Animal Industries
Idaho State Department of Agriculture

Begin forwarded message:

From: Rulon Jones <utahelkhunt@gmail.com>
Date: June 9, 2022 at 3:44:09 PM MDT
To: "Dr. Scott Leibsle" <Scott.Leibsle@isda.idaho.gov>
Subject: Rulemaking - IDAPA - Domestic Cervidae

All across the country, when CWD is found in an area we have seen a big variety of reactions. Some states have done very little, Colorado for one. They have been known to have CWD longer than any other State. What has been the result of CWD in free ranging cervidae in Colorado? No change in free ranging populations since identifying CWD there! Colorado currently has the largest free ranging elk and mule deer population of any state in the country. Doing very little has worked for them. Our neighboring state of Wyoming has had the same approach with a similar result. They also were one of the first to recognize CWD presence. There has been no impact on total numbers of wild populations in Wyoming.

Some of the more drastic reactions from state agencies to CWD have been similar to what we saw with the Fish and Game here in Idaho. This approach is to be much more proactive, kill lots of animals with the approach that we can stop the spread. This approach around the country has had no effect on containment. Future cases have always been found in these areas and elsewhere in those states. Eliminating as many animals as can be found in the positive testing areas makes the general public aware something is being done by the state agencies involved. The problem is this approach has been proven to have no influence on containment and controlling future cases.

In many states that have domestic cervid, where CWD has been identified, there is almost always blame placed on domestic producers. Managing government agencies again believe adding more restraints, more regulation proves they are doing something. Many of these actions make no sense or have any science to back them up.

The fact is producers have nothing to do with what has happened in the wild population in Idaho. Here in Idaho additional rules are being proposed for producers to again be the only ones that will suffer and be influenced by being taxed and regulated more than is already in place. Producers have been testing at a much higher rate than the rate of free ranging herds and we don't have CWD. If the Fish and Game had been testing at the same rate, they would have found CWD in the wild population long before now.

We as producers have taken care of business. We have complied with the massive amounts of regulations, more than any other animal industry. We already are ahead of the curve. We have already been doing all the things that are necessary to be protected and more. With 100% testing of any death,

no matter the cause and 10% random testing of any healthy animal harvested is more than sufficient to catch and contain any CWD that might enter domestic herds. To require sampling of healthy animals to 100% adds a 90% increase cost to an already overly taxed system. Some think it's a small percentage of the value of an animal. The fact is that a large percentage of domestic cervid are used for meat production. At around \$4/lb (hot hanging weight), an animal will bring between \$600 to \$900 per head. To add \$50 plus cost of extracting samples to each animal is a cost that cannot be added and still hope to be profitable.

No other animal industry, even those known to have the same prion as CWD, have been required to do anything close to what we as domestic producers are required to do.

Don't punish us with more burden when we are already doing more than we should have to. We have been asked by Department of Animal Industry to present evidence that proves we don't need additional testing in areas recognized to have CWD in free ranging herds. What more evidence do we need than a clean track record in an industry that has been operating in Idaho since the 1990s? Pretty good case history. Because we are just now finding these positive cases in wild population doesn't mean it hasn't existed. We believe it has and domestic producers have never contacted it here in Idaho.

Since CWD has been discovered across the country, there has been a massive amount of regulations placed on domestic cervid producers. Because of these regulations the numbers of cervid producers in Idaho have plummeted. This amazing opportunity for rural communities to use their private land is being killed by regulations.

We don't have many new cervid producers starting up. People look at the taxation and regulation's we have now and it's just too much government for most and just not worth it.

For those of us that have given our lives to this Industry, we are holding on but I don't know how we can just keep adding more restrictive rules without killing the industry.

The history of what we know about CWD has proven that doing more, isn't better. Let's not get caught up in the moment and put more burden on an already burdened industry.

We strongly oppose any additional regulations. We have more than we should have now. We urge Department of Animal Industry to please not add regulations that will do nothing but burden an already over regulated industry. Thanks for your consideration, Rulon Jones. Broadmouth Canyon Ranch

Sent from my iPhone