



Protecting Montana's wildlife,
land, waters and hunting & fishing
heritage for future generations.

Nov. 28, 2017

Dan Vermillion, Chairman
Montana Fish and Wildlife Commission
1420 E. Sixth Ave.
Helena, MT 59620

RE: Montana Chronic Wasting Disease Management Plan

Dear Chairman Vermillion and Commissioners,

The Montana Wildlife Federation is our state's oldest wildlife conservation organization. We were founded in 1936 when hunters joined landowners to restore wildlife in our great state. For 81 years we have worked to encourage abundant wildlife, healthy habitat and public opportunity to enjoy these public resources.

We are deeply concerned that Chronic Wasting Disease (CWD) has been detected in two Montana mule deer. Montanans interested in wildlife have long known that this day would arrive, with so many of the states and Canadian provinces bordering our state having the disease in their deer and elk herds. Now Montana must work hard to contain the disease and keep its spread to a minimum. We would like to make eradicating the disease the ultimate goal of management efforts.

MWF has reviewed the Montana Department of Fish, Wildlife and Parks' "Montana CWD Management" plan. We commend FWP for attempting to be proactive, and trying to get protocols in place to manage the disease. Unfortunately, it appears the agency is being forced to implement the plan before it's approved. Montana law gives the Fish and Wildlife Commission broad authority to manage wildlife, and this does appear to be a situation where the commission can take strong measures to address the situation.

The current emphasis on stepped up monitoring of deer and elk in select areas that are higher risk is good, as shown by the recent detection of infected mule deer in Carbon County. While this development was disconcerting, it was not unexpected. And it clearly speaks to the need to get the plan implemented as soon as possible in an effort to limit the prevalence of CWD in our wild deer, elk and moose. It is vital that we act quickly to address this issue.

The incident command structure to address a detection is also a good strategy. That will put biologists on the ground to quickly implement a special hunt to get an adequate sample size to determine how prevalent the disease is. Any special hunt could be unpopular with many Montana hunters and wildlife enthusiasts. However, we support a strong response to gain knowledge on CWD prevalence and help shape future management actions.

We should do all we can to limit the geographic spread as well as the prevalence within our deer, elk and moose. While it may be difficult, eradication should be the ultimate goal of management efforts. Even if we do not eradicate the disease, efforts aimed at doing so could have the maximum benefit of limiting geographic spread and prevalence in deer and elk herds.

With that in mind, Montana has done many things right to help with this. Bucks are more likely to spread the disease, and our general season that emphasizes opportunity over building older-age, trophy animals has helped keep buck-doe ratios low. We encourage FWP to maintain this structure through the majority of the state.

The outbreak also speaks to the benefit of having apex predators like wolves and mountain lions on the landscape. Wolves and mountain lions often preferentially kill compromised animals, and once a CWD infected animal starts to show signs of the disease, it will be easier to kill for wolves. That's the way every effective predator hunts. That does not imply that CWD infected animals are not shedding the prions that spread the disease before they start to show symptoms. It does mean that predators could be a factor to help remove infected animals from the population. It's important that these predators play their role in a functioning ecosystem.

The seriousness of this disease speaks to the need for the third emphasis of the plan. A robust public information effort is essential to keep Montana hunters and wildlife enthusiasts informed as we move forward with implementation.

Finally, while we know that one state cannot tell another state how to manage its wildlife, the seriousness of this disease makes it essential that we do everything possible to limit vectors for its spread. It is long past due that Wyoming end its elk feeding program, which congregates animals and dramatically increases the odds of disease spread. This applies not only to CWD, but also brucellosis, foot rot, scabies and other maladies. Montana FWP, our elected officials and others should do all they can to urge Wyoming to end its feeding program. This includes federal funding for feeding on the National Elk Refuge, as well as 22 other feed grounds that are publicly funded and includes a majority of public lands.

Montanans have long feared this day, yet knew it was inevitable. With solid cooperation from Montana's hunters, as well as landowners and others, we can work to limit its scope in both range and prevalence. We should strive to eradicate CWD in cervids in our state, and must act quickly. MWF stands as a willing partner to help protect our highly valued public wildlife resources.

Sincerely,

A handwritten signature in black ink, appearing to read "William Geer". The signature is fluid and cursive, written in a professional style.

Bill Geer
President