



State of Wisconsin
Governor Scott Walker

Department of Agriculture, Trade and Consumer Protection
Sheila E. Harsdorf, Secretary

DATE: July 10, 2018

TO: Board of Agriculture, Trade and Consumer Protection

FROM: Sheila Harsdorf, Secretary *Sheila Harsdorf*
Melissa Mace, Acting Administrator, Division of Animal Health

SUBJECT: Animal Diseases and Movement, Wis. Admin. Code ch. ATCP 10 (Statement of Scope)

PRESENTED BY: Melissa Mace, Administrator, Division of Animal Health *Melissa Mace*

REQUESTED ACTION:

At the July 24, 2018 DATCP Board meeting, the Division of Animal Health within the Department of Agriculture, Trade and Consumer Protection will ask the DATCP Board to approve a statement of scope regarding Wis. Admin. Code ch. ATCP 10 pertaining to farm-raised deer movement and fencing.

SUMMARY:

The Department submitted a proposed emergency scope statement to the Governor, who approved it on May 3, 2018. The Joint Committee for Review of Administrative Rules, pursuant to Wis. Stat § 227.136, directed the Department to hold a preliminary public hearing and comment period on the emergency scope statement. At the DATCP Board meeting on May 24, 2018, the DATCP Board heard testimony from 23 individuals concerning the scope statement. The Board approved DATCP's notice of preliminary public hearing and comment period. On June 7, 2018, DATCP convened a preliminary public hearing. Thirty-five individuals provided testimony at that hearing, while an additional 15 individuals submitted their positions on the matter in writing. In addition, DATCP received written comments from 137 individuals and organizations. Pursuant to Wis. Stat. § 227.136 (5), all written comments are being supplied to the DATCP Board, along with a document containing summaries of the testimony provided at the May 24, 2018 DATCP Board meeting and at the June 7, 2018 preliminary public hearing, as well as an index and summaries of the written comments themselves.

Next Steps

If the DATCP Board approves the statement of scope, the Department will proceed to draft the emergency rule and submit the proposed emergency rule in final draft form to the Governor for approval, pursuant to Wis. Stat. § 227.24(1)(3)1g. A copy of the proposed emergency rule final draft will be provided to the DATCP Board. If the Governor approves the emergency rule, it will be signed, docketed, published, and then in effect for 150 days.

STATEMENT OF SCOPE

Department of Agriculture, Trade and Consumer Protection (DATCP)

Rule No.: Wis. Admin. Code ch. ATCP 10 (Existing)

Relating to: Animal Diseases and Movement

Rule Type: Emergency

1. Finding/nature of emergency:

Chronic wasting disease (CWD) is a serious issue facing Wisconsin. Since its discovery in Wisconsin in 2002, 53 counties either have experienced a positive test for CWD or are within ten miles of a positive testing event. While the pathways for the transmission of CWD remain unclear, Wisconsin has made efforts to slow the progression of the disease by restricting baiting and feeding and by requiring additional fencing that restricts contact between wild deer and captive populations. These efforts have not prevented the spread of CWD.

The progression of CWD threatens the welfare of Wisconsin's unique hunting culture as well as the multi-billion dollar hunting industry within the state. CWD also threatens captive deer herds maintained by Wisconsin's deer farms. The situation warrants emergency rule-making because findings of CWD infection are likely to increase prior to the completion of the multi-year process of permanent rule-making.

2. Description of the objective of the rule:

This proposed rule is intended to prevent or slow the spread of CWD by requiring the installation of enhanced fencing around all populations of captive deer. Enhanced fencing is conceptualized as consisting of at least one of the following barriers around the entire perimeter of any deer farm or hunting preserve: a double fence; a solid barrier that is at least 8 feet high; or three strands of electrified wire on the inside or the outside of the entire length of the perimeter fence.

Secondly, the rule would institute a ban on movement of farm-raised deer in any county that is affected by CWD.

3. Description of existing policies relevant to the rule and of new policies proposed to be included in the rule and an analysis of policy alternatives; the history, background and justification for the proposed rule:

The status quo

Currently, a herd in which CWD is detected must be quarantined for 5 years. DATCP may order the destruction of the herd, may require the disinfection of the premises, and may require the herd owner to enter into an agreement including a covenant to maintain fencing at the premises. DATCP maintains a chronic wasting disease herd status program that requires participants to engage in a variety of testing regimens, keep records, and install safeguards including the installation of enhanced fencing in cases where wild deer test positive for CWD in the vicinity of the captive herd. The program includes requirements concerning the movement of deer and additions to the herd.

Justification for proposed rule.

The reasons for the proposed rule are (a) the severity of CWD and (b) existent policy has not arrested the spread of CWD.

Policy Alternatives.

The alternatives are to remain with the status quo or to promulgate measures that are more restrictive than the status quo but less restrictive than the proposed rule.

4. Statutory authority for the rule (including the statutory citation and language):

DATCP has specific rulemaking authority over the farm-raised deer industry under s. 95.55 (6), Stats., including the authority to promulgate “[s]tandards to be followed by persons keeping farm-raised deer to prevent the spread of disease.” DATCP also has authority under s. 95.20, Stats., to prohibit or regulate the movement of animals if there are reasonable grounds to believe it is necessary to prevent the introduction or spread of disease. Additionally, under s. 93.07, Stats., DATCP is obligated to make regulations that are necessary and proper to the enforcement of statutes including chap. 93, and to establish and enforce animal quarantines.

5. Estimate of the amount of time that state employees will spend to develop the rule and of other resources necessary to develop the rule:

DATCP estimates that it will use approximately 0.10 FTE staff to develop this rule, which includes time required for the investigation and analysis, financial assistance criteria, rule drafting, preparing related documents, and communicating with affected persons and groups. DATCP will use existing staff to develop this rule.

6. Description of all entities that may be impacted by the rule:

The rule will have an impact on keepers of farm-raised deer and on hunting preserves maintaining herds of captive deer.

7. Summary and preliminary comparison of any existing or proposed federal regulation that is intended to address the activities to be regulated by the rule:

There is a federal CWD-monitoring program, and federal regulations restrict the interstate movement of captive deer. The USDA Animal and Plant Health Inspection Services (APHIS) is in the process of updating their Chronic Wasting Disease Herd Certification Program Standards. Federal legislation has been introduced to provide additional funding for CWD research and control efforts, upgrade diagnostic laboratories, and create a National Chronic Wasting Disease Clearinghouse.

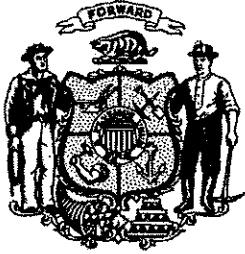
8. Anticipated economic impact

The proposed rule will have a moderate to significant economic impact on keepers of farm-raised deer and on hunting preserves. Few of these locations currently have enhanced fencing. The cost of additional fencing consists of the cost of the materials plus the cost of labor. Both of these will vary based on the size and dimensions of the farm or preserve. The proposed rule is anticipated to include the option of electrified fencing, which is cheaper than existent options for enhanced fencing. It is anticipated that many keepers of smaller premises would perform the labor themselves. Most deer farms are small, less than 10 acres. The proposed limitation on the movement of captive deer will have a potentially moderate to significant impact on keepers of farm-raised deer.

Contact Person: Bill Cosh, DATCP; phone (608) 224-5020.

Sheila Harsdorf, Secretary
Department of Agriculture, Trade and Consumer Protection

Date



SCOTT WALKER
OFFICE OF THE GOVERNOR
STATE OF WISCONSIN

P.O. Box 7863
MADISON, WI 53707

May 3, 2018

Sheila Harsdorf
Secretary
Wisconsin Department of Agriculture,
Trade, and Consumer Protection
2811 Agriculture Drive
P.O. Box 8911
Madison, WI 53708-8911

RE: Scope Statement for Emergency Rule modifying ATCP 10 relating to animal disease and movement

Dear Secretary Harsdorf,

I hereby approve the statement of scope submitted on May 2, 2018 to SBO, pursuant to Wisconsin Statutes § 227.135, in regards to an emergency rule modifying Chapter ATCP 10 of the Wisconsin Administrative Code. You may send the scope statement to the Legislative Reference Bureau for publication pursuant to Wisconsin Statutes § 227.24(1)(e)1d.

Sincerely,

Scott Walker
Governor

Summary of Public Comments on the Statement of Scope for Emergency Rule ATCP 10

The DATCP Board held a meeting on May 24, 2018 and received testimony from the public. DATCP subsequently convened a preliminary public hearing on the statement of scope on June 7, 2108 at DATCP's offices. Both before and after the preliminary public hearing, DATCP received written comments from individuals or organizations. This document encompasses all of the speakers at both the Board meeting and the preliminary public hearing (as well as listing those who did not speak but who filled out registration cards at either event) and the written comments received by DATCP during the public comment period.

Speakers at the May 24, 2018 DATCP Board Meeting

name	position taken	Summary of testimony
Laurie Seale, Whitetails of Wisconsin	oppose	<p>Ms. Seale has spent 30 years deer farming, loves what she does, and is upset with what is proposed for deer farmers in the state. Ms. Seale states that there is a federal rule for CWD in effect as of 2010, mimicking the Wisconsin CWD rules. Wisconsin has one of the strictest programs in the nation, where we find the disease early and eliminate. Wisconsin requirements allow for easy trace and elimination of CWD positive deer, unlike in the wild herd. The proposal will cost millions of dollars and not stop the spread of CWD. Farms are already double-fenced. In a CWD-positive county, you would not be able to move live animals, so fencing will not help. The Board should review the industry best management practices. Deer farming is a highly regulated industry. In facing a 75% shutdown on movement due to a disease, other animal industries would be up in arms. CWD is not an emergency, and she asked what part of the emergency rule description is the state using to promulgate an emergency rule because she does not see any of those criteria meeting this rule. Since 2002, Wisconsin has spent more tax dollars than any other state and now proposes another action without scientific basis. The media has not accurately portrayed the problem. Unfunded mandates do not solve the problem. Farmers are finding CWD early and eliminating it, without compensation. Putting deer farmers out of business would not stop the spread of CWD in Wisconsin. Deer farmers are doing everything they can to prevent the spread of CWD. A double fence would only help a CWD-positive facility that chooses to stay in business.</p>
Rick Vojtik	oppose	<p>The putative objective of the scope statement is to slow CWD, based on the reasoning that existing policy has not arrested the problem. The rule is more of the same and will not work, in terms of regulating deer farms and adding testing. Deer farms must be completely certified and tested to move to another location in the state. These farms are overregulated based on federal rules. Economic impact as it relates to the double impact is not where the real economic impact is; rather, it is in moving animals from affected areas. The scope statement needs to bring out what the economic impact is: shutting down nearly 70-80% of the farms in the state who would not be able to move animals. Those farms would have no choice but to depopulate their facilities, losing the animals and their investments in equipment. They also would have to pay for more testing. There has yet to be a case where it was proved that deer farms spread the disease to a wild animal. There is a low risk of this occurring. Even the cited studies regarding saliva passing CWD through a fence is skewed; the 2006 study had to give 3 fawns 50 ml of saliva to get the disease to pass. This would not happen naturally. Using lesser amounts of infected material did not transmit disease. The proposed rule is more of the same that has not worked and will not prevent the spread of the disease.</p>

George Meyer, Wisconsin Wildlife Federation	support	<p>The federation represents over 50,000 members directly, while indirectly representing 650,000 gun deer hunter and 225,000 archer deer hunters. Hunting is part of Wisconsin's heritage and recreation and is big business. Hunting is a multi-billion dollar industry and clearly is threatened by the spread of CWD. DNR records show that even over many years, there is an average of 25 to 30 escapes of domestic white tail deer from deer farms. Despite the regulations being in place for many years, in the last 3 years, hundreds of miles away from the endemic herd, CWD has been found in Eau Claire, Oconto, Shawano, Waupaca counties (and one other). Therefore, what is in place is not slowing the spread of CWD. Sportsmen also need to do more. Hunters should oppose deer baiting. But the Governor's proposal needs to be put in place. There is ambiguity surrounding the authority for the rule; movement from deer farms is apparently under the purview of DATCP whereas moving deer carcasses falls to DNR. There is ambiguity as to which agency is responsible for fencing. Pursuant to Wis. Stat. § 90.2, DNR is supposed to promulgate rules regarding fences.</p>
Shawn Schafer, North American Deer Farmers Association	oppose	<p>Mr. Schafer was formerly on the North Dakota Board of Animal Health. Good regulations are in place. Instead of creating additional regulations, the government should update the science of existing regulations and should enforce the existing regulations. Adopting this rule would set a dangerous precedent. [The outbreak of tuberculosis] in Minnesota is an example. A market for deer cannot exist without movement from farms? The emergency need for the rule is questionable. CWD is serious, but what has changed in the last 6 months that has not been true for the last 20 years? He has been active in this issue since 1997. The hearing process makes better regulations than a kneejerk emergency rule process. Livelihoods will be taken away.</p>
Greg Flees, Whitetails of Wisconsin	oppose	<p>The current rules are working. We test 100% of animals, and that is why we find it. If we tested 100% of the wild animals, we would find many more. We find it on farms because we test it. Mr. Flees has a positive farm in Marathon County. Game farmers are working to figure out how to beat CWD. They are working with CWD researchers to develop deer that are resistant to CWD. His facility and other positive facilities are being researched. Knowledge being gained includes identification of genetic resistance. Farmers are starting to breed for resistant animals. Deer farmers can be part of the solution more than they ever were a part of the problem. If we can breed animals that resist CWD, maybe farmers can help solve the problem with the wild deer. Doing what we are doing we will have CWD for the next 200 years. What deer farms are doing could stop the spread of CWD. His herd is going to flip the genetics so that 95% of the herd is genetically resistant. He is working with Nick Haley on research. This information will not be able to be used if he is unable to move his animals. People are bashing deer farms, and people do not know how regulated the industry already is. He has a breeding farm that is 41 years old, and he purchased a new farm in Marathon County that tested positive. The original herd did not ever test positive. The Marathon County CWD came from the landscape.</p>
Brad Heath	oppose	<p>Mr. Heath has raised deer for over 20 years; deer farming is his sole source of income. He has done everything possible to prevent CWD, has double fenced for 15 years and is currently participating in the monitoring program. The rules in place are working. The current system enables locating the disease and eradicate it. If all deer farms in Wisconsin were eliminated, CWD will still be here. The proposed rule will be bad for his family and business if it goes through.</p>

Ryan Rodenkirch, Whitetails of Wisconsin	oppose	Mr. Rodenkirch is a deer farmer. He owns facilities in Dodge and Wood counties. He cannot move animals between properties, forcing him to close businesses. His breeding farm is at 100% testing. Fencing or movement did not create the Eau Claire positive. Hunters from all the states have harvested deer in Wisconsin. We need to keep researching and solve CWD.
Roxanne Lotts	oppose	Ms. Lotts owns Indianhead Whitetails in Barron County with 500+ whitetail deer and 20 elk on separate farms, providing urine collection industry and a huge amount of revenue for Wisconsin. There are 5 seasons in the deer industry – this is fawning season. Not being able to move animals means not being able to feed them. The absence of end market means killing healthy animals and not even being able to send them to slaughter. How could a farming industry sustain itself if you cannot move or sell your product? The federal rules are working as intended. Her farm has tested over 500 animals – all their animals. Testing records show they have a CWD-free farm. If CWD comes in, it will be confined and detected. She is testing 45 of 500 deer annually. Instead of restricting movement, consider testing a certain amount of animals in a herd each year. Testing should be increased instead of restricting movement. Double fencing has not stopped the progress of CWD. One of her farms is double-fenced. CWD is moving through the wild deer. In a captive herd, it is contained, and the herd is depopulated. The national impact of her company is \$30M, lure for deer hunters. If Wisconsin is the first state to adopt such a rule, others will follow. It will have an enormous economic impact. The proposed rule will force her into bankruptcy.
Joel Espe, Wisconsin Commercial Deer and Elk Farmers Association	oppose	Mr. Espe's wife served on Vilsack council and has spoken at CWD symposiums. DNR has not declared CWD to be communicable to humans. There is a possible high risk of suicide for the 416 farm families. In light of the fact that livestock can jump fences and that e.g. cattle can spread the disease in their manure, are we at some point going to stop allowing movement of other livestock? There has never been an elk with CWD. He was required to double fence last year. The testing was required due to the 5-mile rule. DNR had no proof or chain of custody. Someone turned in a positive sample and said it came from this area, and it cost him over \$20K for fencing. The rules may require other types of farms and crops to be fenced in if they are found to also be spreading CWD. Taxidermists are a possible culprit.
Corey Siegler, Wisconsin Commercial Deer and Elk Farmers Association	oppose	Mr. Siegler is a third generation deer farmer, family farming since 1992. CWD has never been found on his farm. He has been a hunter since he could follow his dad through the woods. The rule will put farmers out of business. The fencing cost will be unmanageable. The inability to move animals will make it impossible to generate revenue. There should be no further rules restricting movement. The federal rules are grounded in science. The proposed rule will do nothing to prevent CWD in the captive or wild herds and will put an unmanageable burden on small family farms.
Lisa Clark	oppose	Ms. Clark has a farm that has been in operation over 25 years. She tested all her deer and all were CWD negative. She will be put out of business if they cannot move animals. Both she and her spouse have outside jobs. They love what they do. Although the Department is in charge of agriculture, it is also in charge of trade. Feed, corn, and seed for deer plots generates income. Local cooperatives would lose money if the farms close. Veterinarian service for deer farm herds would lose over \$10K in revenue. None of us know how CWD arose.

Bill Knutson	oppose	<p>Mr. Knutson has served on the Wisconsin commercial deer and elk farming board and other boards and has farmed for over 15 years. The antler products he sells would also not be able to be moved. He has been breeding for resistant animals. He has never had a case of CWD. A requirement for double fencing cost would render it not feasible to continue in the elk-ranching business. Not being able to move trophy elk would put him out of business. The antler products he sells would also not be able to be moved. The proposed rules will not prevent the spread of CWD in Wisconsin.</p>
Bruce Krueger	oppose	<p>Mr. Krueger raises elk in Manitowoc, specializing in handicapped hunts. The rule will affect feed mills, guides, veterinarians, and meat processors. There never has been a CWD elk, with over 10K animals tested.</p>
Brian Wolf Wisconsin Commercial Deer and Elk Farmers Association	oppose	<p>Mr. Wolf is an elk farmer. A ban on his ability to move animals (elk meat at a farmer's market, bulls to a hunt ranch) would eliminate his two sources of income and would put him out of business. He has sunk costs for feed and veterinary bills. He joined the monitoring program at its outset and has never had a CWD-positive deer. He has one all that has been asked of him. He believes the movement ban is unfair.</p>
Katie Marty, Whitetails of Wisconsin	oppose	<p>Ms. Marty supports the position of Whitetails of Wisconsin. She started her small deer farm 6 years ago. Her parents and her child are involved in the operation of the farm. The rule will put them out of business. The rule would require them to kill their herd because they cannot afford the feed costs required to keep the animals alive. She estimates that 75% of deer farms would be put out of business. Deer farmers are victims of CWD and are not the problem.</p>
Steve Hookstead	oppose	<p>Mr. Hookstead is against any more rules including this emergency rule. He has been a deer farmer for 24 years and was a hunter long before that. He looks at CWD came not only as a farmer but also as a hunter. Wisconsin has not exhausted other means of fighting CWD. Retail stores across Wisconsin deer bait, even though bait can only be used in 20 counties. Query where has this bait deer corn been going? Query why are we not harvesting any and all deer in CWD affected counties? Query why we allow white deer to not be harvested especially in the CWD affected counties?? If we are not going to harvest the deer and sell bait everywhere, then we are not serious about stopping CWD.</p>
Jan and Barb Armstrong	oppose	<p>The Armstrong's family has put everything they have into their farm hoping that it will help them at their retirement. They are all concerned about the spread of CWD, but cervid farms are being unjustly regulated out of business, especially considering the small number of deer in captivity as compared to the wild herds. If the rule is adopted, they will lose everything.</p>
Gretchen Schmitt	oppose	<p>Ms. Schmidt owns a farm in the Green Bay area, saving land from a housing development. Wisconsin can learn from the USDA genetic based flock cleanup plan for scrapie in sheep. Scrapie is controlled and no longer pose a threat to the sheep industry. Some cervids like mule deer are susceptible, while others are not. Genetic markers for resistance are an excellent potential way to reduce the disease in the herd. Deer farmers support the research through their foundations. Both wild and farmed deer will benefit. Destroy the deer farm industry will cause the research to disappear.</p>

Jenny and Logan Chireck	oppose	<p>The Logans make enough to get by and love it. They are in fawning season and are currently bottle-feeding. Whitetails of Wisconsin is a wonderful organization that helps many charities. This will all stop if DATCP stops farmers from moving animals. Other related industries will also be impacted, with their livelihoods at stake. Deer producers are highly regulated and are over-scrutinized by the media. Their deer are loved. Sick deer are not wandering on the ranches. There is no emergency as nothing has recently happened that has not happened for last 40 years of deer farming. DATCP should start by carcass movement rules for hunters. Logan (age 11) has helped raise deer since age 3 and does not want to stop raising deer.</p>
Rick Alsager	oppose	<p>The real problem has to do with perception and a disregard of science. Mounting regulations are based on mere assumptions. It is assumed disease is spreading. In Wisconsin, animals are not dying on deer farms. Fencing will not stop scavenger birds or blood-sucking insects. There is an agenda to destroy the deer farm industry. He is offended when a bureaucrat walks onto his property and says you are contaminated, you cannot trade, and all your animals must die. He has been around livestock his whole life. Feeding livestock does not create disease; the assumption that it does is not based on fact or science. He attended a meeting in his county. Everyone was against game farmers for bringing disease into the county. They wanted to burn him out and kill all his animals. The bureaucrats in the room prevented from addressing the public. A reporter was not allowed to interview him or tell his side of the story. The industry is being targeted to discourage hunting.</p>
Sam Vainisi	oppose	<p>Mr. Vainise represents any small farmer, no matter what type. He is trying to follow his dream and do a good job. He is a veterinarian and co-owner of a deer farm. A 1954 trip to New Zealand inspired him to farm red deer in a Green Bay suburb. He currently has 300 animals and markets to restaurants. He has trophy stags which are sold across the country. He has raised a closed herd since the beginning and has tested 10% of his animals annually since 2001. He double-fenced in 2002 when DATCP offered to cost-share. He never thought CWD would be a problem. The proposed scope/rule will close all farms without impacting CWD prion transmission. The vector of infection is likely a wild bird or other varmint. In a closed deer herd in Minneapolis, the only red deer in the herd was diagnosed, and the whole herd was put down. APHIS is not sure how the transmission occurred, but surmises that it probably came from a wild bird or varmint. Prions will get onto a farm from a bird or varmint. The rule would put his farm out of business. What would they do with their 300 animals? There are other, science-based options.</p>
Bob Welch, Whitetails of Wisconsin	oppose	<p>Deer farmers work closely with DATCP to ensure we have healthy farms. They use science, as other livestock farms do. If there is an outbreak, they depopulate. Double-fencing will put some farmers out of business. The scientific benefit of double fencing is unclear. There is no correlation between double-fencing and the spread of the disease. The limitation on movement of captive deer will create a severe impact: 80% of the farms will be out of business in months if there is a ban on movement of deer in affected areas. Like cattle, deer are raised to be sold. Genetic research could make a herd CWD-immune. Within 5 years, the farms could all be CWD-immune. Then deer farms could help with the fight against CWD in the wild. DATCP should not to kill the goose that is about to lay the golden egg (of immunity).</p>

Jane Stolz	oppose	Ms. Stolz is a 20-year deer farmer. There is no correlation between where CWD came from and where deer farmers are located. Farmers are not spreading the disease. She is testing 100% of the deer on her farm. There is much research being done, and farmers can be part of the solution. A requirement to install double fences, and other regulations, will put them out of business. It is not possible to fence everything in. The proposed emergency rule will not solve the problem. Research since the 1950s has not solved CWD. The disease is likely in the soil and in insects. Deer are not wandering around dying. The situation is not an emergency and the proposed rule will just cost a lot of money and put a lot of people out of business.
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The following individuals attended the hearing and filled out registration cards: Chad Bowers (oppose); Todd Breitenfeldt (oppose); Sheridan Clark (oppose); Amy Jelinek (oppose); Chad Jelinek (oppose); Carol Kubly (oppose); Greg Listle (oppose); Andy Lezner (oppose); Dan Van Ooyen (oppose); Carley Rodenkirch (oppose); Ron Rodenkirch (oppose); Ben Ruys (oppose); Guy Senkowski (oppose); Jim Stiegler (oppose); Greg Stec (oppose), Jonathan Szczesny (oppose); Jonathan Szczesny I (oppose); and Cathy Winingger (oppose).

Speakers at the Preliminary Public Hearing on June 7, 2018

name	position taken	summary of testimony
Sarah Kroll	oppose	Ms. Kroll started her reindeer business at age 17. Reindeer should be exempt from the rule. The proposed rule would end their business. She profits by bringing animals to events around Christmas time. Various businesses also make a profit in connection with the reindeer showings. Reindeer have not had CWD in the U.S.
Roxanne Lotts	oppose	Ms. Lotts and her husband James have a urine-based company that collects deer urine scent and sells it to deer hunters. According to DATCP's own website, humans are resistant to transmission of CWD; captive deer farms are not spreading diseases to wild; and there is no evidence of transmission from captive to wild deer. Therefore there is no emergency. Governor Walker has used the phrase "working together" in connection with dealing with CWD. The captive deer industry can contain disease outbreak. Not so with wild deer. Potentially infected deer can decimate the entire industry. If deer on deer farms are considered potentially infected, then all deer must be considered potentially infected. Free-roaming deer and elk are potentially infecting captive herds. Hunting organizations will say they represent thousands of hunters, but those the majority of those hunters use deer scent which is only available from deer farms. She represents tourists who come to farm for tours. The rule impacts our livelihoods. They have businesses that they work hard to sustain. Most deer farms will be put out of business by the rule.

<p>Representative Janel Brandtjen Wisconsin Legislature</p>	<p>oppose</p>	<p>Representative Brandtjen is appearing on behalf of a reindeer farm (Reindeer Games). A rule limiting reindeer to one part of the state would be harmful to reindeer farmers and also be harmful to tourism. They have been double-fenced for the last 10 years. They would go out of business if unable to move. Reindeer are highly regulated. Reindeer have not been diagnosed with CWD. The value of a reindeer is approximately \$10000.</p>
<p>Jeff Phillips</p>	<p>oppose</p>	<p>He is a reindeer breeder and owner association. He feels reindeer should be exempt from the rule. As currently written, the rule would shut down his business. His business contributes to the local economy by inter alia buying straw, hay, feed, and other items. He has been compliant with DATCP. The rule has unintended consequences; he doesn't think the Governor intended to include reindeer within the rule. There are only 6 or 7 reindeer farms in the state. Reindeer are important to tourism. Reindeer draw shoppers into downtown areas. Reindeer shouldn't be considered captive but rather domesticated. Raising reindeer is a challenge. The veterinarian inspects every 30 days during the holidays. They installed double-fencing at their farm some years ago with an understanding (from the Governor) that they wouldn't be locked down re transport. The government needs to find ways to preserve commerce. Income is crucial for the existence of a family farm. The health and comfort of reindeer is their highest priority</p>
<p>Shawn Schaefer Executive director, North American Deer Farmers Association</p>	<p>oppose</p>	<p>Mr. Schaefer Has raised deer for more than 20 years. He represents all the cervid farmers in North Dakota. Over the last 14 years, he has been on the North Dakota Board of Animal Health. He has attended every CWD and prion symposium, including one in Madison. He has worked on a USDA task force and other task forces re: CWD. He has worked with top researchers re prions. More options have emerged in the last 3-5 years. 15 years ago, monitoring was the only tool. Now, there is live testing and genetic resistance markers. The first conference on CWD was in 1997. He is currently optimistic re CWD. Captive deer is an \$8 billion industry. He doesn't see an emergency. Over 15,000 family farms are trying to make a profit off marginal land. A blanket hold order would decimate the industry. Many areas have 20% CWD prevalence = thousands of infected deer in WI. USGS: 35K deer were killed in WI last year. The proposed rule will not stop CWD. The movement of soils and alfalfa is not being discussed. A team effort is needed. Installing electric fence doesn't work. Science doesn't support transmission through fences. Building walls or secondary barriers to limit escape is good in principle. The government should promulgate measures that are less restrictive and more advanced. An electric fence is indeed cheaper than some alternatives. Live testing should be used. The RT-QulC test is very good. We should move forward but should move slowly. A blanket hold order on everything is not good. Other animal diseases were scarier. CWD is not the bogeyman it is made out to be. A casual sneeze or lick through the fence does not transmit CWD. New technology and new science are key.</p>
<p>Joel Espe</p>	<p>oppose</p>	<p>Mr. Espe discussed a theory that CWD originated in research facilities. In the past, there was informal regulation of CWD prior to the formulation of specific organizations and rules. He has participated in 2 international CWD symposia. He was involved with CWD-monitoring legislation. DNR rejected the idea of prohibiting out of state deer with spinal columns. DNR has failed in eradication efforts and at management/containment efforts. Deer are livestock. He believes DNR is trying to regulate livestock. Controlling the spread of CWD by DNR is doomed to fail. The number of young hunters declining. Wisconsin is recruiting young hunters.</p>

Jerome Donohoe	oppose	<p>Mr. Donohoe spent 32 years in medical college. He is a contractor with the cervid industry re: CWD. CWD is a secondary disease process, like Alzheimer's, that develops as a result of long-term lifestyle and environmental factors. CWD is not a serious issue. No research has been conducted re the primary process. The captive deer industry uses the gold standard in testing for CWD. The Board should mandate the testing of all wild deer for CWD. DNR has authority only to "manage" but not "control" CWD. Prions have been found in hay, mineral licks, and other agricultural products. If there is really an emergency, DNR should remove wild deer from around farms (which are known to be free of CWD) and should restrict the movement of agricultural products from the CWD-positive counties. There is no evidence that CWD spreads through fencing. Little is known about the transmission of CWD. The Board must include deer farmers in the process of rulemaking. Any double barrier must be paid for by DNR. Deer are livestock that are covered under "crop damage" provisions. White-tailed DNR fencing should be moved to DATCP.</p>
Brian Wolf	oppose	<p>Mr. Wolf is an elk farmer. The emergency rule should not pertain to elk. Only a few CWD-positive elks have been found. The real emergency is CWD in wild deer. The increase in wild deer eventually affects elk. DNR should do more, possibly by extending the deer season. Burying carcasses might reduce carnivorous transfer. Incineration would destroy prions. The cervid industry has been doing its fair share to combat CWD, including by promptly reporting any infection. His farm is double-fenced. Every animal taken for slaughter is tested and therefore is safe for human consumption. Preventing transfer would eliminate his prime source of income.</p>
Greg Flees	oppose	<p>Mr. Flees has been a deer farmer for 41 years. He doesn't believe there is an emergency. The current program is working. CWD resistance is the key. The solution will likely come out of captive farms. He has millions of dollars tied up in various deer farms. The rule puts deer farms out of business without having any effect on CWD. The rule would effectively destroy the source of the solution to CWD.</p>
Dan Reinke	oppose	<p>Mr. Reinke is a member of American Elk Breeders. He has been raising elk since 2002. He has 200-250 head of elk. He tests for TB and brucellosis and tests 100% of He spends thousands of dollars keeping his herd healthy, with most of the money going to local veterinarians. He also spends thousands of dollars on proteins, minerals, fuel, and equipment costs. The industry is already heavily regulated. He noticed deer debris on the road and theoretically could be transporting prions</p>
Rick Ewert	oppose	<p>Mr. Ewert has been raising cervids for 10 years and now raises solely elk. His primary business is meat sales and also sells dog chews and the like. He has spent several hundred thousand dollars over the last ten years. He faces the loss of his past investments plus also the loss of the value of his herd. The statement of scope is inconsistent on its face, insofar as it states that the pathways of transmission are unclear and implies that fences don't work. The deer industry has much lower rate of infection than the wild herd. We should be looking into the many other possible causes of CWD. In the scope statement, the phrase "potentially significant" in relation to economic impact should be replaced with "devastating." The rule will put him out of business to the detriment of the local economy. He spends \$30K on feed and hay, hires local workers to bale and wrap hay, regularly buys new feeders and tools, spends approximately \$1K in diesel, pays several thousand dollars a year to his local veterinarian, recently spent \$4K in artificial insemination. All his tractors and other equipment is maintained locally. The rule will not stop CWD in the wild.</p>

Brad Heath	oppose	Mr. Heath has been raising deer for 22(?) years. "We raise 'em because we love 'em." He needs to move deer. Deer farming is his only source of income. His entire family is involved. Prohibition on moving deer will not prevent the spread of CWD. Deer farmers are probably the solution to CWD. Everything we do know about CWD comes from research on deer farms.
Becky Heath	oppose	Deer farmers need to work together. CWD does not cause deer death; death is always caused by something else. CWD is not found in farms. She has followed all the rules. It will be found elsewhere in the wild. Closing her farm would leave over 300 deer with nowhere to go and no one to feed them.
Carley Rodenkirk	oppose	Ms. Rodenkirk recently completed hunter training. Deer farmers care about CWD. Deer farmers are not the enemy and shouldn't be scapegoated. Those supporting the rule lose nothing, whereas the deer farms will lose everything. Other livestock are not facing restriction. The rule would destroy families and farms.
Ryan Rodenkirk	oppose	It was that CWD would wipe out deer; that didn't come true. The average Wisconsin deer hunter would say CWD is a political disease. There is no published incident of transfer from farm to wild. Farmers shouldn't be punished.
Michael Gillis	oppose	Deer farming is not like other animals, deer have some wild blood. A deer may go "schizo" during TB testing. Some deer have mental problems that lead to injuries. The government should spend to money that the rule would cost and should spend the money to develop a working group re CWD. What lines of communication does DATCP have with e.g. universities? His biggest investment for retirement for deer farm. Wisconsin deer farmers will bring about the future. Other types of farmers (e.g. fish farmers) get government support. A hybrid might come from a deer farm.
Dan Van Doyen	oppose	The Van Doyens' sons grew up living the farm life. It has been a difficult year because in part of the proposed rule. They are excited about fawning and bottle-feeding the fawns. If the rule happens, they would not be able to move animals and would have to put entire herd down. It is said that CWD would decimate the deer population. In fact, however, since 2002 the wild herd has increased despite CWD. E.g. Dane County had 9000+ deer in 2002, now has 16000+. If the rule happens, 76% of deer farms in Wisconsin, representing 15,000+ deer would go under. People come to their deer farm to bottle-feed fawns. He doesn't want to have to destroy his deer.
Jeff Fritz	oppose	Mr. Fritz has been involved in the cervid industry for 30 years. In the 1980s, he was involved in agricultural industries. He has traveled to 25 different countries. They raise elk. He spent time in Madison during his youth. Wisconsin can be a leader in agriculture (e.g. dairy, cranberries, stem cell research). We should allow a \$10M industry to continue. We should allow generations to come to say, "I am a deer farmer." There used to be 38 dairy farms in an area he knew.
Hannah Fritz	oppose	Ms. Fritz is a 5th generation deer hunter and a 3rd generation deer farmer. She has opened her own deer farm. Her family has operated a reindeer exhibition company. The emergency rule would devastate her business.
Rich Sitarski	oppose	He has been working with DATCP. He came to Wisconsin from Illinois to learn about industry and to open an elk farm. He has kept all require records He has been planning to open a much needed butchering service that would service bison, cervids, etc. ... When will the rules and regulations ever stop? He would not move forward with the butchering service if the rule progresses. The rule is politically motivated. The Governor's mandate is not founded on science and research. Good cervid farmers are the best bulwark against CWD. CWD will continue to spread inter alia via deer carcass movement, because of transport into Wisconsin. He thinks Lyme disease has had severe effects. Cervid farming is better for marginal land. Deer farming can become an American farm success story.

Chris McGeshick	oppose	Mr. McGeshick is a tribal leader. The rule would affect tribe's traditions, culture and history. Therefore the tribe needs to have a say in the issue. For instance, tribal ceremonies utilize venison. The tribes don't make decisions in the same way as other governments or communities. Each tribe has its own constitution. Decisions are made by elders who consider benefit to future generations. On this issue, the government didn't consult tribes properly. All parties need to listen. Currently, every constituency is at odds with each other. We need to agree on the goal. The deer farmer properly asks why they should have to pay for offense Let's figure out what CWD is, how bad it is, etc. He personally doesn't believe in the ethos of deer farms, but he doesn't want to be one-sided.
Dennis Pagel	oppose	Deer farming is a hobby for Mr. Pagel. The rule would put 400 businesses out of business. DNR doesn't have common sense. They know they can't stop CWD in the wild. Let Nature take its course. Very few people think CWD is a problem and that deer farms are a problem. The government should listen to the public.

The following individuals attended the preliminary public hearing and filled out appearance cards but did not speak at the hearing: Chris Cutsforth (oppose), Joni Van Doyen (oppose); Michael Foy (support); wrote note on card: "Subject to final details, would also support use of state funds to assist deer farms with cost of compliance"; Matt Frisch (oppose); Steve Hookstead (oppose); Amanda Kroll (oppose) Bruce Krueger (oppose), Greg Listle (oppose); Chad Jelinek (oppose); Ryan Kennen, (oppose); Don Lessor (oppose); Ben Ruys, (oppose); Andy Lenzner, no position indicated); Greg Stec (oppose); Ervin Schmacher (oppose); Mark Utzig (oppose); and Robert Welch (oppose).

Written Comments

The following comments were received by letter, by email, or in hand. Selected excerpts are included along with a reference to the page number of the comment within the compilation of the full text of the comments. Various individuals forwarded academic articles and other professionally generated materials. These materials are not collated with the senders of the materials, but are aggregated separately at the end of the packet of written comments.

page no.	name	position	Summary of comment
1	Kip Adams, Quality Deer Management Association	support	The QDMA is a national nonprofit wildlife conservation organization with over 60,000 members "dedicated to ensuring the future of white-tailed deer, wildlife habitat and our hunting heritage." "Currently, 26 states prohibit hunters from bringing harvested deer with intact high-risk parts (brain, eyes, spleen, spinal cord and lymph glands) into their state from states that have confirmed CWD. Fifteen states restrict high risk parts from entering their state from any other state – regardless if that other state has confirmed CWD or not... CWD can be spread via saliva and interactions between wild deer and captive deer should be eliminated" thus QDMA supports enhanced fencing. "Unfortunately, there is not a practical and reliable live animal test so CWD-positive deer could unknowingly be moved among facilities. Moving live deer is the most likely way to spread this disease..."

Lance Miller Purina Animal Nutrition	oppose	If the rule is put in place, Purina would face a \$4M loss in sales. Purina will survive economically even if the rule is promulgated but many of Purina's customers won't survive. The Board should consider the science behind the rule and whether the rule will actually create a benefit rather than creating a political effect.
Dennis and Diana Denman	oppose	Ms. Denmann raises elk. She feels she keeps jumping through hoops. She was quarantined for 10 years as she refused to double-fence. Movement to slaughter affects the right to farm. She doesn't understand why money spent on double fencing shouldn't be spent on research. Canada has produced a vaccine. There's no scientific evidence establishing how CWD is transmitted.
Lisa Clark	oppose	Ms. Clark believes there is an MOU between DATCP, DNR and the federal government concerning epidemiological issues. She is concerned as to whether the putative MOU is being followed. She believes the MOU contains the tools necessary for dealing with CWD if everyone is collaborating. She is from small farm in Athens and has been involved in deer farming for last 10 years. The farm has been in operation for 25 years. She is sacrificing time from her day job to come and testify. People's retirement plans are at stake, children's futures at stake. It may not be possible to restrict the spread of CWD. At least 4 independent researchers are working on a solution for captive deer. All available information should be utilized.
Judy Domaszek	oppose	People are emotional because it's their livelihood. Ms. Domaszek runs a zoological site where deer roam freely; it is a highlight for people to hand-feed the deer. The zoo has been open for 60 years and has been in the CWD-monitoring program for 14 years. The zoo educates 20,000 students. They do a lot of business with Purina. The zoo employs over 40 skilled employees. People are trying to shut them down. The zoo spends about \$400K on feed. DATCP regulations create an exemption for zoos; AZA exemption is political. About 10 years ago, definitions were addressed. The zoo is accredited by the American Zoological association. She believes regulatory definitions should be addressed. She attended a DNR meeting in Rhinelanders. DNR said deer farmers supported fencing, but she stood up to assert that they don't.
Laurie Seale	oppose	Ms. Seale is a deer farmer in Taylor County. She has also raised cows but prefers deer. The economic impact would not be "moderate." The cost of fencing alone estimated at \$20M. Added fencing also involves bulldozing. There's not enough profit in the business to pay for fencing. Who is going to kill all these animals? Anyone who is not moving live animals should be exempt from fencing. She doesn't understand how the proposed rule affects either public peace, health, safety or welfare. Deer farmers love farming. The government should promote small business and agriculture, for instance as Teddy Roosevelt did in advocating for the legalization of deer and elk farms. The government should be promoting family farms where children learn work ethic etc. rather than watching TV. We should work together to deal with CWD rather than fighting in the legislature and the courts. Incidents of CWD on deer farms show that system is working. No agricultural industry is without risk but deer farming is very low-risk. Deer farm industry is victim of the diseased wild herd. Research should be devoted to identifying the vector of infection. The Cervid industry has been working for years to control CWD. Wildlife agencies have allowed carcasses to be moved freely. It is not CWD but hunter retention that is the major threat to the industry. George Meyer said he represented thousands but he does not represent any deer farmers.

2	Annette Aeberhard	oppose	“These rules will put most of these farmers out of business.”
3	Cathy Ahrens	oppose	“The three-step plan will prevent the genetic resistant research to continue what has the potential to sustain the farmed and free range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”
4	Dee Ann Allen, Lac du Flambeau Band of Lake Superior Chippewa Tribe	support	“Waawaashkeshi (deer) are a prominent traditional food that we highly depend on for sustenance... as a Tribe we request formal consultation on how the proposed rules will apply within our reservation borders... These proposed and current rules are not protective enough and more stronger restrictions or prohibition of deer farms throughout the states need to be a priority. A targeted testing initiative should be conducted within every county to monitor the spread of CWD. More coordination between DATCP, DNR and Tribes must occur to successfully address the CWD issue and Tribal input must be considered in any effort.” Public and community awareness on CWD and the handling of CWD infected meat and carcasses should be increased.
5	Kenneth Andries	oppose	Mr. Andries opposes a plan reported in the Milwaukee Journal/Sentinel that would prevent the removal of legally harvested deer carcasses from a CW- affected county, unless the meat is deboned from the carcass. “As a senior hunter approaching the age of 80 years, this regulation would present an extreme hardship for me. Although I can field dress a deer, I am not capable of nor do I have the expertise required for skinning, quartering and boning the animal... For over 40 years, I have been deer hunting on land I own in Marathon County, Wisconsin. As I reside in Waukesha County, after registering a harvested deer in Marathon County, I normally transport it home to the City of Waukesha where I take it to a local professional butcher for the proper processing, which includes butchering, packaging and freezing of the meat... If I were required to have the deer processed in the county in which it was harvested (Marathon County in my case), that would require me to make an additional trip back to Marathon County to pick up the venison after hunting season, likely in late winter if the deer was killed during the gun hunt or late bow season... Please ... protect and maintain the ability of all hunters to participate in the great sport of Wisconsin deer hunting in our state, by not creating an additional hardship that may force many hunters, like myself, to give up the sport.”
7	Autumn Armstrong	oppose	“The three-step plan will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”
8	Jan and Barb Armstrong.	oppose	“We own and operate Wildlife Creations Whitetails in Taylor County. We have put almost everything we had, retirement funds and inheritance to build our facility. We are almost 60 years old and were planning on the farm for some support for our retirement. Our farm is our livelihood, our passion. We love what we do and care what happens to our deer. If this Emergency Ruling passes we will lose everything we worked so hard for. We are all concerned about CWD, but do not believe the Emergency Ruling would be the answer. The farms are not the problem but the solution.”

9	Andy Azcarraga	oppose	<p>“Double fencing the domestic cervid ranches has not worked since producers have tested thousands of animals and then one shows up as a positive... We all know that captive cervids are being tested at a much higher rate than those cervids in the wild. Why punish the captive producers when in fact they could help lead to discoveries of preventing or controlling CWD? ... There are labs and studies being conducted to see if there are specific genes that are resistant to CWD. We need to allow the captive cervid industry to continue operating under the current rules and regulations as long as they meet those standards. ... [The captive cervid industry] as business owners can't control diseases outside of their facilities, but can within their facilities. We don't close state lines or halt everyday life because there is a flu epidemic, we look for vaccines or ways to cure it or prevent it. The same applies here. We need to make this great country we live in easier to do things, not make everything more difficult.”</p>
10	Lindsay Balson	oppose	<p>“I am the Head Curator at Wildwood Wildlife Park for the past ten years....I believe these proposed measures will cause hard ship to the zoo and even [a]ffect ...attendance, which is our total revenue for the zoo operations. ...[M]any guests come to Wildwood Wildlife Park to see and hand feed the deer; it is an awesome experience not to mention very educational... We are not in any state of emergency we just need DATCP and ... DNR to work together with the deer farmers to better understand what is going on with the wild deer. We certainly should not be blamed for the CWD in our counties there is no scientific evidence to point the blame on our businesses.”</p>
11	Heather Begley	oppose	<p>“I do not support the emergency rule for farm raised deer movement and enhanced fencing.”</p>
12	Steve and Marsha Bertram	oppose	<p>“We are lifetime hunters, life members of Seven Oaks Archery Club and former deer farmers in Iowa County... The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed AND free range whitetail deer populations in Wisconsin long into the future... Last fall our deer farm of 20 years was one of the few double-fenced deer farms that contracted CWD... We are anxious to learn exactly how our non-clinical deer could “catch” CWD. We depopulated our herd and just received test results back on Friday. We can undeniably state that we cannot come to a conclusion as to how they contracted CWD. Two of the deer that we were told tested positive had no contact whatsoever with each other or the other 19 deer that tested positive on the stocker side of our farm which is split by a 20’ runway. There is so much more we need to learn about this disease – you cannot do it without deer farmers. ... If the deer farms go down, the wild deer go down. Potential cures for CWD may be lost if these proposals are passed.” According to an appraisal, the price of the average buck raised commercially in Wisconsin is \$5000.00 wholesale, an average open doe is \$2500.00, an average buck fawn is \$2000.00, and an average doe fawn is \$750.00.</p>

15	Larry Bonde, Wisconsin Conservation Congress	support with reservations	<p>“In 2016, the DNR initiated the first 5-year review of the DNR 15-year CWD response plan and CWD initiatives...Enhanced fencing is an important part of any biosecurity plan for livestock based agricultural facility. The mink industries have had to go to extremes to keep disease from destroying their businesses by constructing expensive barriers and fencing to make sure no animals from the wild will enter their facilities. ...[T]he cervid industry should also take these precautions for the protection of their businesses as well as that of the wild herd. Currently there are some cervid farms in Wisconsin who understand the value of double or enhanced fencing and have already applied this as an aspect of their biosecurity plan. With the lower cost of electric fencing, this requirement is a reasonable and affordable precaution to require of cervid farms. In addition, restricting the movement of deer from deer farms that are in CWD-affected counties would be an effective measure, however, it would likely put some deer farmers out of business. While the Conservation Congress does not promote deer farming, when making rules and laws, we also want to take every measure possible to avoid economic hardships for the citizens who stand to lose the businesses they are heavily invested in. The WCC would be supportive of a modification that would only allow movement of deer from deer farms in CWD affected counties to other CWD-affected counties. This would still restrict movement of deer from deer farms in CWD affected counties to those counties that are not CWD affected. ...[T]his is a reasonable compromise that offers the non-affected portions of the state protection against movement of animals from CWD-affected counties, but still allows those farms in CWD affected areas an option and place to sell their animals”</p>
17	Megan Braatz, Executive Director, Delafeld Chamber of Commerce	oppose	<p>“Reindeer Games has played a large role in our holiday event, Breakfast with the Reindeer. We have over 2,000 community members who look forward to this event every year and travel from all over Wisconsin to see Reindeer Games. Reindeer Games is a positive influence on our community and provides joy and memories for thousands of children each holiday season. We have been made aware that you are considering not letting their reindeer leave their property. This decision would hugely impact our chamber and community along with many other local communities. Reindeer Games is a great company with great morals and ethics and has provided and continues to provide excellent care to the reindeer for many years.”</p>
18	Todd Breitenfeldt	oppose	<p>“My wife Carrie and I along with our two children... have been raising Whitetail deer since 1995....Deer farming will come to an end [under the rule, because of] [t]he cost of modifying our fences, the stress it will cause our animals, ...[We would have] to put up all new fencing and we have no place to put our animals while this is being done and not being able to sell our animals due to being in an affected county...There is no evidence CWD is substantially increasing mortality rates during the duration of a study done from 2003 through 2007...[L]et Mother Nature run its course... We should ...get rid of the feeding ban for hunters which would take away the pressure the hunters are putting on state officials to put more regulations on deer farms...the Wisconsin deer farm industry [is] a \$200 Million dollar industry as well as the dollars we spend in our economy. The Wisconsin wild deer herd is as strong as it's ever been in the central region of the state...Having tighter regulations on feeding for hunters[wil]l overpopulate the Wisconsin deer herd, push hunters away from purchasing a license and also cause conflict between hunters and deer farmers.”</p>

Edward Gingerich	oppose	Mr. Gingerich's farm has been double-fenced for a while. The rule would put him out of business. Let Nature take its course. He is more worried about Lyme disease than CWD. The movement ban would not affect CWD in the wild
Dan Trawicke	oppose	Mr. Trawicke has been raising deer for 25 years. The rule is based on anecdotes rather than science. There is no scientific evidence establishing that CWD is caused by deer farms. In the past, he argued in the context of a DATCP proceeding that electric fencing was suitable but was directed to install a double fence. 98% of captive deer will be killed. No one will keep deer as pets. The rulemaking lacks common sense. Deer farmers with positive CWD on site are allowed to use electric fencing and thus paradoxically have greater rights than deer farms, such as his own without CWD.
Gretchen Schmidt	oppose	Ms. Schmidt is a deer farmer and veterinarian. She is concerned about the inability to move deer. Her farm has been double fenced since 2002. There is no CWD in her county but she knows it's coming. Many farms rely on income from venison, including sales to restaurants. The rule on movement has not been well researched.
Ralph Fritsch, Wisconsin Wildlife Federation	support	The Federation endorses the DATCP finding of emergency. There were 5 instances of CWD on deer farms in northern Wisconsin, well over 100 miles from the endemic zone in southern Wisconsin. There have been 2 additional findings on farms in southern Wisconsin. Current regulations have been ineffective. DNR reported 25 deer escapes in 2015, 16 in 2016, and 18 in 2017. The Federation supports the enhanced fencing requirements. Many dairy farms have successfully installed double fencing. The Federation recognizes the financial impact on cervid farms. Hunting white tails brings \$1B per year into Wisconsin's economy. The two sides should work together. CWD affects everyone; for instance he himself experienced lost property value due to reputation of CWD area.
Sam Vainisi	oppose	A finding of CWD in his county prevents movement, but he doesn't see the connection between the finding and the ban on his moving deer. His farm has been double fenced for 16 years. No infected deer is ever going to get into his farm. Prions can be transmitted in many other ways, including birds and varminits. We need common sense. The issue should not be a political football. We shouldn't put everyone out of business. CWD is going to spread to every county.
Jane and Hannah Stolz	oppose	The last two infected farms had double fencing. The proposed rule will not stop CWD. The mechanism of Transmission is unknown. The money should be spent on research rather than spending millions on eradicating deer. Everyone wants to come to Wisconsin to hunt. She and her husband hunt in Alaska and observe how carcasses create seepage into soil. Carcasses along the side of the road lead to grass that deer eat. Prions are in the soil and there is snowmelt runoff. Scrapie in sheep was eliminated by selective breeding. The rule would result in killing off useful, potentially immune deer.
Carol Kubly	oppose	A finding of CWD on farms leads to containment; not so with wild deer. Deer carcasses along roadway are not dealt with; we see the same deer on the side of the road week after week. Birds come to feed on these carcasses. When she started deer farming, she decided to double-fence. There is a misconception that deer farming is not regulated, but deer farming is highly regulated. Her farm has not had any escapes. The deer farm industry is funding research that shows promise in fighting CWD. Without movement, deer farms can't make money to feed deer. Banning movement won't prevent CWD. She would be forced to euthanize 100 deer. Her farm is a family farm. The state is changing the rules. The rule is not based on science. Deer farmers are victims, are not the problem, and are possibly part of the solution.

20	Nate Chambers	oppose	<p>“The three-step plan will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”</p> <p>“I do not support the emergency rule for farm raised deer movement and enhanced fencing.”</p> <p>“There are no statutory criteria being presented that meet the requirements for this to be allowed through the emergency rule making process. The data being presented as factual in the scope statement, is flawed as well as inaccurate with regard to the financial impact that it would have on the small businesses of Wisconsin. The true fiscal impact aspect alone, would preclude this scope from proceeding as an emergency rule, rather than being examined thoroughly under the normal legislative rule making process. I vehemently request that this Board outright reject this Scope statement, or any further consideration in the emergency rule making process, as it is unwarranted, and unqualified for such consideration as an emergency rule, under current statutory requirements in Wisconsin.” [Ms. Clark also submitted an outline of testimony by Mr. Donohoe and submitted a statement from her veterinarian affirming the health of the deer on Ms. Clark’s farm and stating that the veterinary practice would lose \$10,000 annually if deer farms go out of business.]</p>
21	Jacob Clark	oppose	
22	Lisa Clark	oppose	
53	Alberta Darling and Janel Brandtjen	oppose	<p>“Farm-raised reindeer in many instances are treated much like domestic livestock. These animals are well cared for and inspected continuously by veterinarians including every 30 days during the traveling season. Over the past decade, each deceased reindeer has been tested for CWD without one positive case of the disease...Reindeer have an immense impact on tourism in our state, especially in November and December. For instance, Reindeer Games alone serves 29 communities in Wisconsin, drawing thousands of shoppers into historic downtown areas for winter festivities. The reindeer at locations like Reindeer Games are already protected by a double fence. There is no evidence to prove that more restrictions on these reindeer farms will yield results in hindering the spread of CWD. The reasons above clearly demonstrate the futility in including reindeer farms into new CWD regulations.”</p>
54	Rick Dehring	oppose	<p>“The three-step plan will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”</p>
55	Jacques E. deMoss, President, Missouri Deer Association; First Executive Vice President, North American Deer Farmers Association.	oppose	<p>“The disease is in the wild and removing deer farmers will do nothing to change that fact. No one would ever consider shutting down 75% the cattle industry in a state due to a disease... This industry could end up being the solution to CWD by driving research into live testing, vaccine development, genetic mapping to breed CWD resistant deer (like what was done with Scrapie in sheep species)... Many Wisconsin deer farms are already double fenced and with the Governor’s proposal, those farms will also not be able to move within the state. Why would anyone spend money to double fence if movement is going to be prohibited anyway? Further, science does not support transmission through fences.”</p>

56	Michael Deveny	oppose	<p>“Shutting down deer farms in Wisconsin is not going to stop the spread of CWD. Deer farmers could end up being the solution to CWD by breeding for and producing resistant animals much like the sheep industry did with Scrapie. The cervid industry has spent over a decade working to prevent CWD, but unfortunately the wildlife agencies have not done their part and now the free ranging herd is jeopardizing our herds and our livelihoods. The 4 most highly infected CWD counties in Wisconsin have populations that have doubled or nearly doubled since 2002 when CWD was first discovered. How could this possibly be considered an emergency that warrants destroying an entire industry? ... CWD in Wisconsin does not warrant an emergency rule!”</p>
57	Courtney Devine	oppose	<p>“There is absolutely no scientific evidence, studies or any proof, to justify this proposal; it is a blatant attack on the deer farming industry.... [Deer farmers] are the victims of this unfortunate situation. ... There is no evidence that preventing the movement of private animals will have any impact on CWD in the wild. Walker needs to come up with a scientifically backed solution instead of destroying families and businesses in Wisconsin.”</p>
58	Michael P. Devine	oppose	<p>“The spread of CWD is not the fault of the deer farmers. By adding the restrictions in the Governor’s proposal, it will severely cripple the deer farmers in Wisconsin, and put many of them out of business. I would suggest as a compromise that the deer farmers have the ability to move deer from CWD areas to other CWD areas.”</p>
59	Taylor Devine	oppose	<p>The rule will harm local businesses. Wisconsin has many deer farms and “people from around the US come here for the experience. If the bill passes and the farms go out of business, those people won’t be traveling here to boost our local economy.”</p>
60	Derrick Domask	oppose	<p>“[D]eer farms are closed, fenced environments ... [on the off chance CWD is detected on a farm, the disease is contained and can be eliminate[d], unlike with free-ranging deer that have spread CWD across Wisconsin and other states... Wisconsin deer farmers are contributing to research to help fight CWD. Whitetails of Wisconsin is funding research projects to study the effects of CWD on infected captive animals.... The deer industry is also funding genetic resistant research.... Wisconsin deer farmers, along with CWD positive hunting ranches, are spending tens of thousands of dollars working with researchers to find deer with greater resistance to CWD ... redundant fencing would cost hundreds of thousands of dollars or more to install, while bans on transporting deer between controlled environments would choke farms and hunting ranches. Double fencing ... is not going to stop free-ranging deer from continuing to spread CWD. Even if every deer farm in the state is put out of business, free-ranging deer are still going to continue to spread CWD. The biggest risk of CWD transmission is not deer farms, but carcass movement by hunters, according to an official with the US Geological Survey. Carcasses are moved around the state to non-infected areas and then birds of prey feast on these infected carcasses, further spreading the disease....there is no evidence of a need for “emergency” regulations. CWD was first found in Wisconsin in 2002, and research released from the University of Wisconsin-Madison found ‘no evidence that CWD was substantially increasing mortality rates during the duration of our study from 2003-2007’ ...[T]hese latest proposals will cost taxpayers when the state has to defend them in court....[The rule] would put deer farms and hunting ranches—a \$100 million a year Wisconsin industry—out of business, even though these businesses are already doing whatever they can to stop CWD.”</p>

63	Duane and Judy Domaszek	oppose	<p>Mr. and Mrs. Domaszek own Wildwood Wildlife Park. "All our guests love coming to the zoo with the deer walking among them. The guests also love hand feeding the deer and simply just enjoying them. Our zoo educates the public everyday about conservation...ot being able to have the deer at the zoo would impact the visitation of our zoo guests. With over 160,000 attendees and over 4,000 zoo members which, come to the zoo with endless visits seeing the baby fawns being born, the fawns nursing from their mom, and simply seeing them grow into the magnificent animals they are. Then to see the bucks growing their antlers and then see them shed their velvet creating a beautiful antler is an awesome experience that our zoo guests witness. ... Many deer farmers bought land that is marginal for most kinds of agriculture and made it into a profitable business, bringing tax revenues for Wisconsin. Not to mention many are family run businesses that have families to support off of their livelihood. ... The U.S. Geological Survey states the high risk of CWD transmission is not deer farms. Moreover, CWD has been discovered in several states (AR, MS, MT) without cervid ranches so there is no private industry to blame. [The] definition [of a scapegoat] is an animal which is ritually burdened with sins of others then driven away t... [O]ver 375 deer farmers/families ... will be put out of business."</p>
66	Shawn & Kim Domaszek	oppose	<p>"I am also an [avid] bow-hunter and the proposal for the deer carcass transportation is not right I own land in Marathon County and if I harvest a deer in Marathon County I would not be able to bring my deer back to Oneida County to feed my family. Many times I will drive to our land after work sit in the stand hoping for the big one and if I shot one I cannot wait until the next day to process it in that area. ... If we are so worried about the spinal column then why ...are we not worried about all the deer that are killed on the roads and are just lying bloated and nothing is done to them. That used to be the DNR's responsibility but they gave it to the counties ... And what about the animals (crow, eagle, raccoon) eating on the dead deer if that deer is infected ... The animal that ate the infected deer will then go defecate in the woods or on an agricultural[al] field where the CWD prions are shed now exposed and sitting on the ground waiting to possibly infect another wild deer. Thus creating a snowball effect."</p>
67	Jerome Donohoe	oppose	<p>CWD is a secondary disease process, like Alzheimer's, that develops as a result of long-term lifestyle and environmental factors. CWD is not a serious issue. No research has been conducted re the primary process. The captive deer industry uses the gold standard in testing for CWD. The Board should mandate the testing of all wild deer for CWD. DNR has authority only to "manage" but not "control" CWD. Prions have been found in hay, mineral licks, and other agricultural products. If there is really an emergency, DNR should remove wild deer from around farms (which are known to be free of CWD) and should restrict the movement of agricultural products from the CWD-positive counties. There is no evidence that CWD spreads through fencing. Little is known about the transmission of CWD. The Board must include deer farmers in the process of rulemaking. Any double barrier must be paid for by DNR. Deer are livestock that are covered under "crop damage" provisions. White-tailed DNR fencing should be moved to DATCP.</p>
80	Sherry Douglas	oppose	<p>"We have over 600 people in attendance each year at the Christmas season event in our Business Improvement District. This event is always on Small Business Saturday and it brings families to our downtown district. Reindeer Games is a positive influence on our community, and helps bring consumers into our shops and restaurants. Please reconsider restricting movement of reindeer, and allowing them to continue community events.</p>

81	Corinne Dunwiddie Juda	oppose	“I do not support the emergency rules for farm raised deer movement and enhanced fencing.”
82	Steve Dvorak	oppose	“As a farmer, a 40 year principal the owner of a farm equipment business, and an owner of an engineering company all located in WI, I find this rule change to be very unusual and ... a knee-jerk reaction for the State of [Wisconsin]. I have been raising elk on our farm for 25 years. ... [I]n the 25 years of raising elk, we have never seen a nose-to-nose contact from native whitetails to our captive elk through the fence nor have we seen winter deer tracks that would indicate that this is happening. ... The breeding program that sheep raisers arrived at through selective testing and breeding for sheep that are genetically resistant to scrapie[] is an example that I believe should be considered for whitetails and for our wild, introduced elk herd. I would be willing to work on this program with our captive herd... If th[e] State does pass these restrictive fencing requirements, I will be forced to give up raising elk after 25 years of following DATCP regulations and testing. I feel that this is unjust and unfair.”
83	Tina Edwards	oppose	“After looking into how it will impact deer farmers, and finding that there’s no scientific proof that CWD is perpetuated by deer farms, I feel very strongly that the potential benefits are far less than the guaranteed consequences. It will decimate deer farms, putting them all out of business. Prioritizing CWD over family lives in [Wisconsin] is a poor choice in my opinion.”
84	Deborah Elmer	oppose	“I do not support the emergency rules for farm raised deer movement and enhanced fencing.”
85	Joel Espe	oppose	“DNR records clearly show that the hunting culture has not suffered due to CWD... The farmed cervids have tested a much higher percentage of their livestock for CWD than is done by the DNR for the wild deer and elk. There has never been a confirmed case of a CWD transfer from a farmed cervid to a wild cervid...”
94	Rick Ewert	oppose	“I am a[n] elk farmer in north central WI ... I think the point about transportation of carcass[es] has some validity and is probably the largest single contributor to the spread of CWD. However, the other 2 points, if imposed, would put me out of business and would, in my estimation, lose approximately \$100,000. That figure does not include all the blood, sweat, and tears I’ve invested over the years but just anticipated loss of value and ability to sell my animals.... On my own farm I was going to begin to introduce CWD resistant genetics into my program. However, with this potential devastation of my business I cannot afford to make that investment. ... [Elk] are very social, family (herd) animals. They are extremely protective of their family units and do not accept new introductions readily. And they would never show interest in a wild, whitetail deer. They would sooner kill it than cozy up to one. So my contention is that a double or additional fence would have no bearing on (CWD transmission at) an elk facility. Even though this rule is disguised as an emergency the problem it has existed for a long time. If it truly is an emergency, why wasn’t the banning of baiting and feeding statewide included (or implemented years ago) if nose-to-nose contact is a concern? People are not really ‘scared’ of the disease. If they were why do they continue to hunt in the endemic areas? The bottom line is the haters do not like high fence hunting. This is evident on social media where people literally say they want us out of business and shut down because of that. However, hunting is a very minor part of our industry. As an elk farmer, my main product is meat with velvet antler coming in a close second. Then hard horn dog chews would be next. Finally, I do sell a few bulls each year to hunt farms but that is not a major part of the business. The new rules would completely put me out of business because I could not even slaughter my animals. What are we supposed to do with all the young stock? ... My farm spends a significant amount of money in the local community. My feed and hay that I purchase run over \$30,000 annually. I also hire local farmers to cut, bale, and wrap hay and cost me almost \$5000/year. I regularly have to purchase new feeders, fence, tools and most years spend several thousand on that. I use about \$1000 in diesel fuel purchased at our local coop. Finally, all my equipment (tractors, skid steers, farm truck, ATV, etc.) are maintained by local shops and run several thousand dollars per year. So even though I only have 55 animals (another 22 calves due any day), I do contribute to our economy just like any other farmer.”

95	Angie Fields	oppose	<p>"I am writing to simple state that I do not support the emergency rules for farm raised deer movement and enhanced fencing."</p> <p>The situation is not an emergency. Deer farmers are victims of CWD rather than the cause. The likely sources of CWD in Wisconsin were University of Wisconsin research units and/or the importation of carcasses from Colorado or Wyoming. Game farms arrest CWD by quarantines and depopulation. "The real problem comes from the movement of diseased wild animals through infected live animal migration, or the transport of diseased carcass materials via 1) human or 2) other forms of natural transport, such as depredation kills, predator migratory habits, feces transport and other lesser mechanisms. Human transport of infected tissue, first by research mistakes and now via hunter kills IS the major factor in disease dissemination. "[T]he movement of untested carcasses derived from hunter kills" should be stopped. Animal movements cannot be easily controlled. "While a 2nd fencing barrier can inhibit wild to domestic contact, the costs are prohibitive and the results are cosmetic. Transient contact does not provide sufficient contamination to transmit the disease."</p>
96	Rich Forrest	oppose	
100	Michael Foy	support with reservations	<p>"I am very concerned about the observed increase in prevalence and geographic spread of [CWD] ... I am writing in general support of the ... administrative rule modifications referenced above, and recommend board approval to proceed to drafting. While the proposed rule modifications may be expected to help slow the spread of CWD due to certain anthropogenic factors (human-assisted movement of diseased live deer and infected deer carcasses, direct lateral disease transmission through inadequate deer farm fences, farm escapes etc.), it is not clear how they will reduce overall disease prevalence and distribution, or slow disease spread from existing locations via natural dispersal of infected deer or other mechanisms. ... [R]ules are not required or necessarily expected to address all aspects of a need or problem. ... [T]he perception exists that CWD will continue to increase and spread regardless of the proposed rule modifications. This may reduce cooperation with the final rules and inhibit their enforcement—if not discourage rule adoption entirely. If any of the above happens (disease spread through increasing prevalence followed by natural dispersal, or because of insufficient cooperation with the proposed rules), it seems unlikely that the rules will accomplish their objectives. ... I would strongly encourage the rules to include additional aggressive and focused measures to reduce CWD prevalence in the wild deer wherever disease is found throughout the state. It is my opinion as a retired wildlife biologist that this is the only way that the terrible threat of chronic wasting disease to our extremely valuable deer herd can be minimized to nuisance levels—and hopefully eliminated some day when an effective, practicable and affordable vaccine is developed. ... While I have longstanding concerns about the captive deer farm industry, I support Governor Walker's statement that the state may consider assisting deer farms with the expense of complying with the proposed rules. As long as the state and federal government continues to indemnify deer farms for the high costs associated with the discovery of CWD-positive deer within their fences, it only makes sense that the state seriously consider sharing the costs of enhanced fencing and other regulations designed to prevent new infections in the first place. ... I would qualify any state assistance, including indemnification, on agreement to willingly cooperate in CWD herd status, prevention and mitigation measures as proscribed by law, backed by a performance bond, including the de-population and clean-up of all deer farms found to harbor CWD-positive animals, including hunting ranches, subject to due process arbitration acceptable to the industry.... The Wisconsin Supreme Court has recognized that wildlife is included in the Public Trust Doctrine enshrined in our state constitution, placing a duty upon all entities of state government to protect our deer herd."</p>

102	Ralph Fritsch, Wisconsin Wildlife Federation	support	<p>The Federation endorses [the] finding of [an] emergency. There were 5 instances of CWD on deer farms in northern Wisconsin, well over 100 miles from the endemic zone in southern Wisconsin. There have been 2 additional findings on farms in southern Wisconsin. Current regulations have been ineffective. DNR reported 25 deer escapes in 2015, 16 in 2016, and 18 in 2017. The Federation supports the enhanced fencing requirements. Many dairy farms have successfully installed double fencing. The Federation recognizes the financial impact on cervid farms. Hunting white tails brings \$1B per year into Wisconsin's economy. The two sides should work together. CWD affects everyone; for instance he himself experienced lost property value due to reputation of CWD area.</p>
103	April Fuhr	oppose	<p>"These rules will put most of deer farms out of business at a time when we need to be encouraging and supporting economic growth and non-traditional farms. It is time to encourage cooperation and growth that is good for all involved."</p>
104	Allen Gierhart	oppose	<p>"If the above rules take effect the following will happen to many great farms, not just one are but across the state. Deer farmers are not going to be able sell their deer if the herd can't be moved. If the farmer has no income, they will not be able to feed his deer. What will happen to thousands of healthy deer? They will be euthanized. ... The State should be doing more testing, cleaning up the wild deer carcasses that sit for weeks along the road (birds of prey feed on them and then spread their droppings on the landscape, which spreads CWD) and they should be funding research! There are 382 deer farms in the State, 285 of them are located in CWD-affected Counties [which equals] 76%. That means thousands of healthy deer are going to be killed over these rulings."</p>
105	Scott Goetzka	oppose	<p>"Our deer are on a 520+ acre hunting preserve licensed by DATCP. We have 4.3 miles of 8ft high tensile wire, which exceeds DNR fencing rule NR 16 standards. ... Even though the 3-wire electric fence is much less expensive than the 8ft tensile, there would still be a significant expense incurred. High tensile 8ft materials and labor would cost us over \$118,000.00 alone, not including the land preparation cost. It would take two winters to accomplish the project, so we are in violation before we even begin without even putting the cost of the enhanced fenced. Electric fencing would require 14 miles of wire, insulators, and additional posts. Power would have to be brought in, and significant labor cost incurred.</p> <p>Materials: 14 miles - 14ga wire - \$128.00/mile = \$1,792.00 Additional Posts \$1,230.00 Insulators 3 per post @ \$3.50 (4600) (15ft post spacing) = \$16,100.00 Electrical = Trenching and electrical service hook up and electric fencers \$9,800.00 Labor @ \$22.75 per hr. Est. 160hrs per employee = \$7,300.00 Total Est. Cost \$33,522.00</p> <p>The 90-day period to complete could not be met. Fall is our crop harvest time, pheasant hunting preserve and deer hunting. We do not have the staff available to accomplish what would be asked of us. Plus, the electric fence according to DNR and USDA damage people will have minimal effect on whitetails and no effect in the winter. I have personal experience with this through the damage abatement program in dealing with the Jackson County Elk herd and our farms. ... The only reason to force a rule like this one on non-movement hunting preserves with acreage would be to prevent nose to nose contact correct? I do not see any sign of deer in, or outside our fence having this type of contact, very easily observed during winter with snow, and [it] doesn't occur. I will not be doing the enhanced fencing for reasons stated above. Please have an exit plan for the farms that don't comply. [These are] the questions I have for these new rules on healthy deer herds. How long after the 90 days before we are declared non-compliant? Once non-compliant how long before action is taken to de-populate my healthy deer, we cannot be asked to kill healthy does with fawns in spring or summer, the love for my deer won't allow [me] to do that fines or not? What is the process for the deer to be depopulated since this administrative rule is causing the killing of my herd not a disease? Is there a fining process after you are declared non-compliant? Who determines my farm is depopulated under this new rule Since my deer have tested clean, what can I do with my farm and fencing after the depopulation and I am out of the deer hunting preserve business?... We live a farm that has been in my family since the 1890's. Our family has learned to diversify and think outside of the box to stay on our farm. We do 200+ acres of row crops, Pheasant Hunting, Deer hunting and Sporting Clays. It's this diversity that will help us weather this political rule, just like it has with weather, low commodity prices and markets.</p>

107	Joey Goguen	oppose	As a "high fence" hunter and investor from Canada trying to help out a friend from WI and wanting a return on my capital it will be impossible to grow this business with no movement of animals! Please take in consideration that a lot of these farmers can't operate within the state of Wisconsin and rely on this to provide for their families."
108	Nicholas Haley	oppose	<p>"I am a veterinary researcher who has been working on solutions for [CWD] for the past 15 years. After completing my Doctor of Veterinary Medicine at Cornell University in New York State, I moved to Colorado and started working on a PhD, focusing on CWD at Colorado State University. ...[M]y research has focused on how the disease is transmitted, the development of more sensitive live animal and postmortem tests for the disease, and most recently the identification of animals which may be resistant to CWD infection. You can find a bibliography of my past research publications here: https://www.ncbi.nlm.nih.gov/myncbi/browse/collection/49902408. ... While double fencing may prove helpful in some instances, it is neither practical nor beneficial to farmed or wild deer in all cases. ... I first met Greg [Flees] briefly a few years ago at a national deer farming conference, not long after he first found CWD in two deer in his herd. ... It was fortuitous that he contacted me when he did, as I was actively looking for a farmed deer herd we could work with to explore the possibilities of CWD resistance in whitetail deer, and his herd was exactly what we were looking for – a farm with active CWD on two of four properties and a significant number of animals on both affected and unaffected properties to work with to develop resistant lines of animals.... We began last October by identifying animals among his herd who we believe have the potential to be very resistant to CWD based on several genetic markers. Greg developed breeding strategies to have fawns on the ground this spring who promise to be extremely resistant. After thoroughly examining the health of these animals, we will eventually release them on the CWD-affected properties and assess their disease resistance directly.... Importantly, this project cannot proceed without the ability to move animals from his unaffected herds to properties where CWD is present. At some point in the future, CWD may spill over from the wild deer to his unaffected properties – we will still need to have the ability to move animals from CWD-positive properties to other CWD-positive properties. ... [I]f we can address the genetics on his properties, the impact of CWD on these animals will be reduced significantly. It is my hope that our work with Mr. Flees will serve as a model for managing CWD in farmed deer and elk, ... While I'm optimistic that a vaccine may someday be developed for prion diseases, I think that idea is incredibly impractical for wild deer and elk and almost impossible to implement effectively."</p>
111	Wayne and Shirley Hamann	oppose	<p>"You want us to double fence for what? Dane County just had a positive whitetail. No deer in or out since 2009. He is double fence[d]. DNR has been against capt[ive] deer farmers since I started in 1969. DNR has no proven reason to put that cost on deer farmers that it will save our wild deer herd. ...I think you have bigger problems than captive farmer raising deer. You come up with ideas from where? \$32 million spent to depopulate deer herd in S. W. Wisconsin. Take OUR money to research, so we all can defeat CWD. I also think fencing should go to DATCP not DNR as DATCP already has authority over double fencing. We have had CWD found in Wisconsin since 2002. What is the big rush to eliminate the captive farmers now? Could it have anything to do with politics? If it is, our heritage of deer hunting will be over. ... You will wipe us out for the cost of double fence. If this does happen, pay us 100% value of our deer and loss of our business appraised value. As a deer farmer we will be glad to work with DATCP and DNR to help resolve this, not throw rules that no one knows [if they] will do anything. ... My deer in captivity are mine, and the deer in the wild are a portion of mine."</p>

112	Lisa Hansen	oppose	<p>"I am a large animal veterinarian in northwestern Wisconsin. I provide direct services to twelve cervid farms and provide consultation services to an additional six farms throughout Wisconsin. These farms comprise a total of approximately 3000 animals. ...In 2017 my clinic tested 203 deer for CWD, all of which were negative. ...". In a recent article in The Country Today, the WI DNR stated that 30% of the male deer population in Iowa county is infected with CWD. I would like to know of any farmed herd that comes close to this prevalence. If Wisconsin is concerned with the health of the captive deer population and wish to protect the farmed deer, the state should be responsible for paying for the required fencing. If the proposed CWD ruling is enforced, it is possible that half of the farms I work with will no longer be in business. Working in an area that is already in a large animal vet shortage area, loosing additional farm revenue makes difficult to hire new veterinarians and be able to pay them a livable wage. The harder that we make it for any farmer to be in business, the more spread out our farms become and the more difficult it becomes to provide timely veterinary service. If we continue down the path of over-regulation, veterinary services will become even more scare and animal health will suffer."</p>
113	Ray Hanson	oppose	<p>"[W]hy are you not using the rules already in place, such as ATCP 10.89 if the department is so concerned with movement of diseased animals? Why create a whole new rule? The double fencing issue does not make scenes seeing as the last 4 or 5 farms that have tested positive for CWD have all been double fenced, and most have been closed herds. Using the DNR's own web sites I cannot see where the emergency is. The ag department has always been on the side of the deer farming industry. Following the rules that are in place. How can the department now change course 180 degrees and put all deer farms[rs] out of business. [The rule is] going to put hundreds of people out of making a living, along with generations of family members to follow."</p>
114	Skip Hanson	oppose	<p>"The recent proposals of Governor Walker that will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free range whitetail deer populations in Wisconsin is something I can't agree with. Potential cures for CWD may be lost if these proposals are passed."</p>
115	Julie L. Harrison	oppose	<p>"The Verona Public Library has been working with Reindeer Games from Hartford, Wisconsin, for the past four years. ... Over 1200 people attend our annual reindeer event at the Verona Public Library. ... The Phillips family and their staff ... care greatly for their animals, and educate the public on their unique features. It is our most popular program of the year, and a festive, happy time for everyone who attends. Please reconsider including reindeer in this proposal..."</p>

116	Tom Hauge, President, Sauk County Sportsman's Alliance	support The proposed regulatory actions are well founded by CWD disease research and actual experience in our state. The movement of farm-raised deer to hunting ranches from areas with known CWD infection creates an unnecessary risk of disease spread. The recent case of movement of deer from a[n] Iowa County breeding facility to a Waupaca County hunting ranch is a clear demonstration of the potential negative impact, both to the involved facilities, but also the surrounding wild deer herds.... The Wisconsin deer hunting season has an annual \$1.3 billion impact on our economy. ... ATCP policy has allowed hunting ranches to continue operations under the rationale that only dead deer would leave the property. However, ... a CWD+ positive facility that continues to operate allows for continued bio-accumulation of prions on the premises and a continued increase in prevalence in the herd remaining on the affected facility. Finally, the facility even if adequately fenced remains a source for disease fomites to infect the wild deer herd surrounding the captive herd. The Marathon County hunting ranch that has had 47 CWD+ animals detected within its herd is a very serious situation that needs to be addressed immediately. ... Your counterpart agency, Wisconsin DNR, does a very complete job of publishing up-to-date and historical testing data for CWD at both the county and statewide level. This information allows for more informed discussions and better policy decisions. We encourage you to develop a web-based reporting of CWD testing within the captive cervid farms in Wisconsin. We need to have equal transparency of the testing data... Nose-to-nose contact between captive deer and wild deer through deer farm fences has been well documented. This is an effective disease transfer route that can be addressed by creation of a more effective barrier. We understand that erection of a 2nd 8-foot high woven wire fence is a major cost for any deer farmer to undertake. However, we do believe that such a fence should be required if the deer farm chooses not to install alternative, lower cost fencing. Electric fencing has been documented to provide an effective barrier to deer. We encourage the department to engage USDA-Wildlife Services on electric fence configurations that could be incorporated into Wisconsin's deer fencing standards ... We also urge the department to strengthen the standards for deer fence gates to reduce the occurrence of captive deer escapes when gates are inadvertently left open. We believe that any upgrade of deer fencing standards should address this aspect as it has been historically the greatest method of deer escapes from captive deer facilities. Perhaps, incorporating cattle crossing barriers would also be effective in preventing deer from exiting through open gates. Finally, we suggest the department consider the establishment of performance bonds as part of the deer farm licensing requirements. Use of performance bonds is an effective mechanism to deal with situations where a facility is not meeting important environmental standards. Such bonds would provide a financial source for the costs associated with escapes from deer farms. Currently, the DNR is using hunter license fees to remove escaped animals from the landscape. This should be an industry borne expense.”
119	Becky Heath	oppose We have been raising deer for over 20 years and we are constantly having to defend our right to raise livestock -in this case Whitetail Deer. Unlike most livestock farmers, the regulations are literally putting us out of business.... A rule that restricts movement would turn our working deer farm into a bunch of expensive pets that we cannot afford to keep.” “We already must pay \$85.00 to test each dead deer for CWD. It costs \$24.00 to get a deer license and shoot a wild deer. This means we can't afford to eat our own animals that get tested 100%. We are already double fenced, so this is not an issue for us, but it is very expensive, and some people will go out of business because of the cost of building supplies needed to build these extra fences.... Our deer can be traced and should be allowed to move throughout the state, like all other livestock.... The percent of CWD positive, out of the number tested in deer farms is extremely small. CWD has not been proven to cause any harm to the human population. Deer farming allows us to work our land for hay and raise animals that help support our family. This business allows us to keep our family farm. Most rules are put in place to protect someone or something. These proposed rules will hurt deer farmers and we have caused no harm to the public or the public's hunting. There is no proof that limiting or stopping the movement of farm raised deer will stop or slow CWD in the wild. The wild deer can travel through any county they wish too.” “...Deer farmers are crucial in the hunt to find out more about CWD, because who knows more about whitetails than the people who dedicate their lives to caring for them?... CWD positives deer are found only after the deer dies from something else.... our farm who has followed every rule set forth by DATCP has no value [in the schema of the proposed rule]. The movement restrictions... would leave us with over 300 deer with no place to move/sell them and no money to feed them. Please help us hold onto our livestock selling business.”

121	Brad Heath	oppose	<p>"I have been raising whitetail deer since 1996. For the last 15 years that has been our family's main source of income. These proposed rules, if adopted would put us out of business. We have been in the CWD program for 17 years and double fenced for 13 years. We are TB and brucellosis free. We have done everything that we could to protect our deer from the wild infected deer. If we can no longer move deer we will go under. My farm expenses are 10,000 dollars per month and most of that is feed. I believe the deer farmers CWD monitoring program is working like it should. Stopping movement from breeding facility to hunting ranch will do nothing to control the spread of CWD."</p>
122	Art Helin	oppose	<p>"The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed."</p>
123	Kevin Hinkebein	oppose	<p>I have been raising elk in Missouri for 28 years ... CWD may be spread by many factors such as wild deer movement, eagles, possibly by hay, and the most serious avenue for entry into states is by hunter harvested deer being brought back to the hunters area and improperly disposed of in ditches and woodlots after they process the meat from the animal. Many family farms raise deer and elk the same as cattle and sheep farmers. These farm raised cervids are very well cared for and properly tested before any movement takes place. The cervid industry is working diligently to find a live animal test and also breeding for CWD resistant animals. [D]ouble fencing and restricting animal movement of deer and elk in Wisconsin ... would have detrimental effect to many family farmers and will have little to no effect on CWD.</p>
124	McKenzie Homan	oppose	<p>"...Banning live animal movement for farm-raised deer and requiring deer farms to double fence will only put small businesses out of business, not reduce CWD. The government should be investing money into research, and if these farms can longer continue to be in business it will also stop research that is currently being conducted by farms on genetic resistance to CWD. Deer farmers are a victim of CWD, not the cause and we need to all work together to reduce the spread."</p>
125	Al Horvath	support	<p>"I am ... sending the results of two resolutions which went through the Wisconsin Conservation Congress Spring Hearings.... Both resolutions have been endorsed by ...[the] Wisconsin Conservation Congress, Wisconsin Wildlife Federation, Wisconsin Bow Hunters Association, [and] Wisconsin Traditional Archers Association... Dave Clausen's "CWD Action Recommendations" resolution ran in 42 Counties. 2,850 Yes votes (92%) against 245 No votes (7.9%). Was one vote shy of a unanimous approval by all delegates at the May WCC 2018 Convention on a floor vote for endorsement. It called for double fencing on all cervid farms in endemic counties; [p]rohibition of movements of all captive cervids from CWD endemic counties and from all positive facilities; [and] [d]epopulation with indemnification, of any CWD infected facilities immediately upon diagnosis of CWD. [The] Al Horvath "Improve Safeguards to Prevent the Spread of CWD" resolution ran in 40 Counties. 2,554 Yes votes (90%) against 281 No Votes (9.9%). [It] [w]as unanimously approved by all Delegates at the May WCC 2018 Convention on a floor vote for endorsement. ... It calls for strengthening the fencing requirements, transportation safeguards, and depopulation of positive facilities. It seeks mandatory participation in the CWD herd status program where possible. 46% participation is too low a rate."</p>

132	Walter and Rosemary Huse	oppose	"We are] opposed to the emergency rule for farm raised deer movement and enhanced fencing."
133	Michaek J. Isham, Executive Administrator, Voigt Intetribal Task Force of the Great Lakes Indian Fish and Wildlife Commission	support	<p>"I am writing you ... regarding the ongoing threat to wild waawaashkeshi (deer) and omashkooz (elk) populations posed by [CWD] in Wisconsin. GLIFWC's mission is to assist our member tribes in the implementation of their treaty-reserved rights throughout the Ceded Territories in a biologically sound and culturally appropriate manner. The tribes retained their rights to hunt, fish, and gather to ensure future generations would be able to sustain their traditional lifeways. Because the tribes consider CWD a risk to human health (the Centers for Disease Control advise that no one consume CWD infected deer), CWD poses a direct threat to the tribes' ability to exercise their treaty rights with respect to deer and elk, and consequently, their ability to sustain their traditional lifeways. The continued spread of CWD in the State of Wisconsin demonstrates the ineffectiveness of the [DNR] and {DATCP} rules and regulations, as well as the lack of effective coordination and cooperation between the WDNr and DA TCP. The news of two additional wild CWD-positive deer within the Ceded Territories is especially troubling ... The location of the CWD-positive deer in Lincoln and Oneida counties is within 25 miles of the reservation of the Sokaogon Chippewa Community and within 30 miles of the reservation of the Lac du Flambeau Band of Lake Superior Chippewa. Tribal deer hunters regularly hunt deer near where the CWD positive deer were harvested. Current regulations governing captive cervid facilities ... are inadequate and recently proposed initiatives are not adequate to address the crisis. ... The "affected counties" designation has likely increased the spread of CWD in Wisconsin by relaxing carcass transport rules in areas free of CWD. ... this area [of affected counties] is so large that it has the effect of allowing the transport of CWD infected carcasses throughout the state with the exception of only Ashland and Door counties. Another problem with designating counties as "affected" after CWD has been detected in a captive cervid facility is that it then allows the transport of wild harvested deer from other CWD-affected counties within that county, despite there being no detection of CWD in the wild herd. ... It is not enough to prohibit the import of live cervids from facilities located in counties where CWD has been detected. Without an effective CWD test for live deer, any import of live cervids into the Ceded Territories that is carried out using standards less rigorous than the standards employed to augment the wild elk herds (i.e. allowing animals only from areas not known to support CWD, mandatory quarantine and observation periods, veterinarian examinations, etc.) is reckless from a wildlife health perspective. ... Wisconsin should impose a moratorium on the transport of live cervids, regardless of their origin. DATCP confirmed that the CWD-infected deer harvested at a Waupaca County hunting preserve originated from a farm in Pennsylvania. Likewise, deer from a Washington County facility, which had been considered a county free of CWD infections, were transported to a hunting preserve in Bayfield County. Only after the deer were transported was it determined that the Washington County facility was a CWD-infected herd. Both of these instances illustrate the need to end the importation of live cervids to areas which are free of the disease, or experiencing it at low levels until a live test can verify the animals are CWD-free or effective quarantine facilities and protocols are in place..... Deer carcass movement restrictions appear to be nothing more than recommendations according to the information provided on the WDNr's website. In addition, there are exceptions to some of the restrictions, for example allowing the transport of carcasses to counties adjacent to CWD-affected counties, and allowing 72 hours to bring the carcass to a taxidermist or meat processor. ... A recent study within the CWD-endemic area of southern Wisconsin determined that CWD-infected deer are dying at three times the rate of uninfected deer. Multiple long-term studies have observed declines in white-tailed deer and mule deer populations within CWD-endemic areas in western states where the disease has been prevalent on the landscape much longer than in Wisconsin. The perception that CWD could affect human health is also likely to lead to a drop in hunter recruitment within CWD endemic areas. As waawaashkeshi continues to be a significant source of lean, healthy protein within Anishinaabe communities, the failure of the State's approach to effectively address CWD also perpetuates harm to the sustainable economies of Anishinaabe communities and to their health. In summary, until effective rules and regulations can be adopted and enforced, WDNrDATCP coordination can be implemented, and</p>

136	Michael Jablonski, President, Reindeer Owners and Breeders Association	oppose	<p>adequate testing levels have documented that CWD is no longer spreading within the state, the VITF strongly recommends the following measures be taken to protect ceded territory deer and elk populations: a moratorium on the intrastate and interstate transport of live cervids; a moratorium on the intrastate and interstate transport of commercial products that contain captive cervid bodily fluids (e.g., urine, semen, scent glands, etc.); and a moratorium on new captive cervid facilities. In addition to the moratoriums, the VITF recommends the following requirements be put in place at all captive cervid facilities currently in operation within the State of Wisconsin: Regarding fencing: Double fencing should be mandatory for all captive cervid facilities at the expense of the deer farm owner(s); fences should be inspected annually, and after any severe weather events. The tribes have expressed an interest and willingness to assist with conducting fence inspections at captive cervid facilities in the past; all trees that could potentially fall on a captive cervid facility fence line should be removed to prevent a significant source of fence damage; all fences should have electronic alarms to indicate whether the fence has been breached or gates have been left open; penalties for escaped captive cervids should be increased; fencing at captive cervid facilities should be required to be maintained if CWD is detected on the property until appropriate remediation of the prion-contaminated environment has occurred...all captive cervid facilities in Wisconsin should be required to be enrolled in a CWD herd status program using USDA APHIS standards at a minimum.... Mandatory CWD testing should be required of every captive cervid that dies on a captive cervid facility, regardless of age, whether they are being shipped to slaughter, or whether they are enrolled in the CWD herd status program. Currently, there are testing exemptions for the [certain classifications of cervids] in Wisconsin.... All herds associated with captive cervid facilities that have animals that test positive for CWD should be depopulated within 30 days.... Following slaughter, cervid carcasses from captive facilities should be maintained separately and not processed for human consumption or animal food until the CWD test results for each carcass have been received. Carcasses that test positive for CWD should be considered "adulterated" and unfit for human consumption or animal feed.... All captive cervid facilities should be required to maintain insurance to cover the costs associated with depopulating, testing, and disposing of a herd that tests positive for CWD... All captive cervids should be required to have two forms of identification, regardless of whether they are born on a hunting ranch or are in a non-enrolled facility...[There should be a] moratorium on the transport and import of live cervids and bodily fluids used as commercial products or for breeding purposes from captive cervids (e.g., urine, semen, etc.) within the state and across state boundaries should be implemented until an effective test can be developed and approved to determine whether the live cervids or bodily fluids used as commercial products or for breeding purposes are infected with CWD. Carcasses from captive cervid facilities that test positive for CWD should be disposed by the following two methods only: within a clay-lined landfill or biodigestion. Care should be taken in the transportation of CWD-contaminated carcasses from captive cervid facilities to ensure that the carcass, implements and surfaces which came into contact with the animal are responsibly disposed and/or segregated."</p> <p>"We have always tried to go beyond state and federal regulations. ... [The rule] would be devastating to our industry which has always exceeded regulations and also to our customers who use the reindeer for state tourism and attractions for events across the country. [T]his is a knee jerk reaction due to pressure from the wildlife people for the hunting licenses (money). ... [F]arms that are trying to get around the rules should be given one warning and if they don't do what is required they should be shut down. ... Farmers that are in good standing in the program should [not] be put under the same umbrella as the ones that don't. If a farm follows what is required by the state then they should have certain guarantees from the state that they will be able to move and do business.... Good farms are protected and farms that do not follow the program are closed. [Putting deer farms out of business will] affect tourism for your state and will suffer [and] local business[es] which will lose revenue. ... your tourism will suffer greatly. The state will in effect have taken reindeer out of Christmas."</p>
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139	Laura Johnson	oppose	<p>“The three-step plan will prevent the genetic resistant research to continue what has the potential to sustain the farmed and free range whitetail deer populations in [Wisconsin] long into the future. Potential cures for CWD may be lost if these proposals are passed.”</p>
140	Tom Johnson	oppose	<p>“I’m a passionate bow hunter ... and a former deer farm owner. The three-step plan will prevent the genetic resistant research to continue what has the potential to sustain the farmed and free range whitetail deer populations in [Wisconsin] long into the future. Potential cures for CWD may be lost if these proposals are passed.”</p>
141	Tom Justmann	oppose	<p>“The Tomorrow River Ranch is a 200 acres white-tailed deer and elk hunting preserve.... On average, an estimated 10-15% of the hunters annually at Tomorrow River Ranch are coming from Europe.....The root cause of CWD has not been identified and legislating a fix before understanding the genesis of the problem puts “the cart before the horse”. ... Long term corrective actions must be guided by science to ensure that deer farmers, ranchers and the state’s “farm raised deer economy” (estimated at M\$100 annually) are not permanently damaged by unsubstantiated rhetoric. ... I recommend funding to identify CWD sources and CWD transmission causes, be appropriated and directed at root cause analysis and delving further into recent genetic test findings. ... There is no evidence of a need for “emergency” regulations. ... Deer farms are an easy convenient target of CWD but there is no evidence that they are the problem! Social media and governmental agencies have not accurately portrayed the problem and have further exacerbated the churn by proposing unfounded, emotional band aids which do not solve the problem for our great state of Wisconsin and its long tradition of deer hunting. [Proposed fencing requirements are] a classic example of “Big Brother” trying to generate regulations to a problem they do not understand, nor know the answer. So instead of seeking the root cause of the problem, the “convenient” solution is to pass regulations to show the public “we took action” To promulgate new laws, rules and regulations without compensation or recourse will invite litigation. (Eliminating a \$100M farm raised deer industry could be expensive). Due to the post glacial moraine topography in my hunting preserve, I have installed 10’ fences to protect against any animal escapes, and the potential for any deer outside the fence to enter my preserve. The estimated cost for a double fence at my hunting preserve is in the range of \$150,000. In addition, I am installing an apron at the base of the fence as further protection against predators having access to the preserve at an added cost of \$23,000.... Whitetails of Wisconsin is funding research projects to study the effects of CWD on infected captive animals. ...2. Controlling the movement of potentially infected deer through the creation of a new DATCP rule banning the movement of live deer from deer farms in CWD-affected counties.... Passing legislation in this direction will result in the public video deaths, offered to TV stations, of the killing of thousands of deer since they cannot be moved. Deer farmers have invested in the deer herds they own based on the law in effect at the time they made the investment decision. Should the state of Wisconsin wish to undermine the value of the herds, I can only expect litigation that may not be difficult to obtain public support based on the videos taken... Persons who live on county lines, should have a minimum radius to move the carcass [of a hunted deer] as well (e.g. 5 miles, 10 miles)... In any case, I don’t believe the state of Wisconsin has the budget to hire enough game wardens to enforce this law.”</p>

144	Belinda Kennedy	oppose	<p>My husband and I own and operate a deer breeding operation in Alabama. I know you immediately ask, "What does that have to do with us in Wisconsin?" Please allow me a few minutes to tell you. We are hunters and we have traveled to Wisconsin and hunted with some of the very people that will be affected by shutting down deer farming in your state. Do you think we will stop hunting? Absolutely not! We will simply move the money we spend to fly into your state, the lodging and food we purchase will in your state and the fees we pay for licenses and hunting expenses to Illinois or some other state. Furthermore, we buy semen from the Fleas family of Wilderness Whitetails. They have some of the best genetics in the United States. We have been using their semen to artificially inseminate our doe herd. Do you think that if you have put the Fleas family out of business we will close our deer farm? Of course not! We will simply look for the next best farm in another state and continue doing what we do but sending our farm dollars to Michigan or some other state.... We all know [CWD] has become, primarily a political disease and politicians are using bad information and fake science to frighten the public. Meanwhile, Wisconsin, like many states are not been proactive in protecting the free-ranging herds and that is where the risk of CWD lies. Heck, we make our living and support our families with healthy herds. Who has more to lose with a CWD outbreak? A politician or wildlife official or a man or woman who pays his/her mortgage payments by selling semen, hunts or animals? The answer is very clear! It is the deer farmer! I urge you to consider facts not hyperbole.</p>
145	Jeffrey R. Knibb and Roxanne I. Knibb (St. Louis, MO)	oppose	<p>"[We are] accredited veterinarians... Effectively quarantining privately owned deer from CWD certified herds with 100% post-mortem surveillance will only serve to destroy an economically important agricultural industry in your state and will do nothing to prevent the spread of CWD in the wild. Every time an adult deer in a certified herd dies, the obex and lymph nodes are submitted for surveillance, demonstrating once again that the herd is not infected. Requiring owners of uninfected animals to enhance their separation from infected animals as a means of keeping the uninfected animals from transmitting the disease to the infected animals does not make epidemiological sense..."</p>
146	Alyssah Kubly	oppose	<p>"The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed."</p>

147	Carol Casey Kubly	oppose	<p>‘If the State is serious about CWD, the State will clean up promptly the dead deer carcasses from the highways and roads that many times sit for up to weeks. We know birds of prey feed on these carcasses leaving their droppings filled with prions on the landscape.... We chose to double fence to protect our herd from the wild, but now find because of recent CWD positives within the State that it does not necessarily protect one from the wild. We utilize in our everyday operation the Industry’s Best Management Practices. We are members of Whitetails of Wisconsin, NADeFA and other Industry organizations so that we know and keep up with regulations and best practices. Our Industry is funding research that shows promise of a positive impact on the CWD. When the emergency rule was announced, it caused us to suspend our plans to do genetic testing of our herd for CWD resistant markers and breeding for resistance. We participate in and fully comply with the highly regulated CWD Monitoring Program, which requires that each of our whitetails have two forms of identification from cradle to grave. We are required annually to submit two herd reports, one of which is a complete census of our herd from cradle to grave tracking all movements in and out of our herd. Our veterinary must annually submit a letter to WIDATCP certifying a business relationship with our farm and that our entire herd has been inspected. No live movement off our farm to another farm or preserve is allowed without a veterinary inspection and health certificate. No movement to slaughter is allowed without a permit. All deaths of deer, twelve months or older, on our farm require a CWD test. We have not missed any CWD tests. We have never had a CWD positive. Last year alone, because of deaths and does butchered on our farm, 9% of our herd that is older than twelve months of age were tested for CWD. In addition, our veterinary is required every three years to submit a herd inventory and our herd is tested for TB and Brucellosis. There is a misconception in the public that the captive deer industry is not regulated. It is simply not true. ...If the proposed ban on live animal movement in CWD affected counties is implemented, it will force us to kill nearly 99 healthy whitetails on our farm. Without movement we cannot sell our animals to hunting preserves, which means no income to feed our deer or operate. [Our farm] is located in Green County is a small family run business. My daughter, her husband and six-year old daughter are partners with my husband and me. We entered deer farming in 2012. We have all invested our time, sweat, energy, money and resources into this endeavor. This is a truly a family-run farm, each (including my granddaughter) with our own area of expertise and responsibility. Kylie helps her mom take care of all of our fawns and with her dad feed peanuts to our deer. We love our deer, it is the only life my granddaughter has known. Killing our deer will devastate Kylie and all of us! ... We know that if one of our deer tests positive for CWD, we are done. We understand this risk and we accept this risk. But, now our State is proposing this emergency rule that changes the rules in the middle of the game...If we are forced to destroy our deer because we cannot afford to feed them, we will not do it quietly. We will invite all the local news stations and press to witness. I am sure my fellow deer and elk farmers will do the same. There is no justification for an emergency rule, CWD has been here for a long time. This emergency rule may make momentarily good headlines but it will do little to stop the spread of CWD. This emergency rule is not well thought out or based on science. This emergency rule will not protect “the welfare” of the State’s hunting heritage nor its hunters. Wisconsin’s hunting heritage and its hunters are better served by the State of Wisconsin working with the captive whitetail industry to [e]ffectively reduce the spread of CWD.”</p>
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149	Brenda Lawson (Freeport, Illinois)	oppose	<p>“I do NOT support the Governor’s proposed emergency rules to combat CWD. Banning live animal movement for farm-raised deer and requiring deer farms to double fence will only put small businesses out of business, not reduce CWD. The government should be investing money into research, and if these farms can longer continue to be in business it will also stop research that is currently being conducted by farms on genetic resistance to CWD. Deer farmers are a victim of CWD, not the cause and we need to all work together to reduce the spread.”</p>
150	Elmer Lemon	oppose	<p>“I am an avid hunter... The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”</p>
151	Corey Lewandowski	oppose	<p>“The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”</p>
153	Amy Barlow Liberatore	oppose	<p>“Number of registered deer farms in Wisconsin 376 Number of hunting ranches 64 of the 376 Number of farms enrolled in the CWD herd status program 173 Number of farms with a CWD positive test since 2001 - 19 Number of herds depopulated as a result of a CWD positive – 11”</p>
154	Eric Lotts	oppose	<p>“I am opposed to the emergency rule for deer movement and fencing.”</p>
156	Eric and Samantha Lotts	oppose	<p>“Our family does not support the emergency rule for enhanced fencing. These rules will put many families out of business.”</p>
155	James Lotts	oppose	<p>“... You have heard hunting organizations say that they represent so many hundreds of thousands of hunters who want the Emergency Rule passed, but what they don’t tell you is that of those hundreds of thousands of individuals the clear majority of them use Deer Scent and you can only get it from a captive herd. There for: I can say that I represent those same individuals because they support our farm by purchasing our products. If deer farming in shut down, that product will no longer be available and hunters will not be happy.... I could also claim that I represent the millions of individuals that love animals as we have those types of people on our farms for tours every year.”</p>

"My husband and I own and operate Indianhead Whitetails in Barron Co.... We own 500 Whitetail deer and 20 Elk on two separate farms; these animals provide product for our urine collection company. We purchase 130 thousand dollars in feed and hay annually to feed our animals. WI Deer Keepers are feeding approximately 12,800 captive whitetails at an annual cost of approximately \$5,000,000....If we have no end market for our animals we will be forced to kill healthy animals and unable under this rule to send them to slaughter. No farming industry could sustain itself if it could not move or sell its product? Double fencing has not stopped CWD from infecting farms that have been closed and CWD free for years. One of our farms is double fenced but now we worry that double fencing will not keep our herds safe from wild deer carrying the disease. The wild deer are moving CWD across the landscape (not the farmed deer) and because of this "the full cost of double fencing should be paid by the state." Indianhead Whitetails Wholesale Scent Manufacturing Business for the hunting industry impacts the national retail economy, with over \$30,000,000 in retail sales annually. If we are unable to move animals or restock our herds our company alone will impact millions of dollars in and out of the state of Wisconsin....If we are put out of business it will impact the retirement of my father and his wife who worked over 30 years as deer farmers, it will impact the second-generation farmer (myself and my husband) as we will be forced to file bankruptcy, and it will impact the third-generation farmer (my son and his family) as he will be out of a job and a future in the farming industry." "DNR's web page shows the thousands of wild deer that are infected with CWD. If a hunter harvests an animal and leaves it where it lays and it is potentially infected it may be consumed and moved by scavengers across the landscape, so this rule is not controlling the spread of CWD. Unless each animal is properly disposed of hunters will inadvertently continue to spread CWD. Butcher shops, slaughter facilities, Taxidermists and Deer farms must bury or incinerate all dead deer they are working to stop the spread of CWD. Hunters need to do the same. If this emergency rule is to control the spread of CWD this rule needs to go one step further: we need disposal sites for all carcasses that are then buried in an approved landfill. If you truly want to control the spread of this disease we must landfill all carcasses even after incineration as prions do not die unless heated to extreme temperature for a prolonged period of time. Almost every county in WI is a CWD affected county or will be in time, so this needs to be done state wide. When I ask hunters, what do you do with your deer carcass after you cut up the meat, most say I throw it in the woods or it goes in my trash, no one tells me they bury it." DNR's statement of scope says "[w]e do not know the economic impact at this time." Well we do know the economic impact to double fence all farms and it will be over \$28,000,000. This is not a moderate impact, it is a significant impact and to many farmers it will be a devastating impact that puts them out of business. It goes on to say: DNR anticipates that implementation and compliance costs would be passed along to white-tailed deer farms and will be far less than \$10 million over any two-year period. The economic impact of this rule is estimated to be a moderate impact (less than \$20 million). As I just stated this is a much bigger impact than written. deer farms should not have this cost "passed along to us" if the state wants it than they should pay for it because: the facts show that double fencing does not stop CWD. Many farms that are double fenced are still getting the disease and many of those same farms are closed herds, so another deer did not move it into the farm, it came in from the outside of the fence. ... Nose to nose contact is not the only way this disease is spread as you know or you would not be requiring hunters to leave the carcasses in the field and not transport them around the country further spreading the disease." "The last farms to come down with CWD were double fenced, so a double fence is no guarantee that our farms will not get CWD from the wild deer. A double fence will not keep out predators and birds of prey who move infected carcasses." The movement ban will put the majority of farms out of business. An analysis of the home zip codes of hunters who killed deer in certain counties illustrates that hunters may be inadvertently transporting CWD all over the state. Deer farmers buy feed, hay, grains, medical supplies, fencing supplies, operational equipment, and pay for trucking and hauling fees, veterinary services, employees' salaries, insurance expenses, land taxes, and the like."

166	Jerry Maerz	oppose	<p>“The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”</p>
167	Katie Marti	oppose	<p>Ms. Marti has a 3-generation deer farm that is double-fenced. Her parents participate and their young daughter loves fawning season. “My daughter helps me with fawn care every year and loves going out with her dad to feed or give them peanuts, their treat. We bottle-fed our first doe fawn last year which my daughter absolutely loved! She helped raise this fawn and now goes on the farm each night to see her, pet her, and give her peanuts.” The movement ban would put her farm out of business. “These proposed rules would eliminate the ability for deer farms to continue the CWD genetic resistance research that has been ongoing, potentially eliminating a possible solution to our state and country’s CWD issue. Requiring double fencing will also not stop the spread of CWD.” She has seen many deer carcasses alongside the road along with birds of prey that could be spreading the disease. “Why does the government think eliminating deer farms will reduce CWD when they are not even certain how this disease is spreading?” She does not believe there is any emergency because there is no emergency risk to the public</p>
170	Bill Mayes	oppose	<p>“Double fencing of deer farms will have zero impact on the spread of CWD in Wisconsin or any other state. ... This is just a platform that could be used to destroy private industry. ... The private cervid industry is working diligently and farmers across the nation are spending their own money breeding animals with CWD resistant genetics to combat the disease. If ever there is a solution to CWD it will come from private enterprise not government agencies. CWD is really about politics, money, and the funding of government agencies. The DNR screams that the world is coming to an end over CWD and they are the only ones that save the day – and by the way make sure our funding allocation is increased for the project.”</p>
171	Malisa McLoud	oppose	<p>“I do not support the emergency rules for farm raised deer movement and enhanced fencing”.</p>
172	George Meyer, Wisconsin Wildlife Federation	oppose with support with modifications	<p>“[T]he Wisconsin Wildlife Federation [represents] 206 member hunting, fishing and trapping clubs ... CWD has been found in deer farms in six northern and central Wisconsin counties well over a hundred miles from the CWD endemic zone in southern Wisconsin, (Eau Claire, Oneida, Marathon, Oconto Waupaca and Shawano counties). In addition it has been recently reported that CWD has been found in two additional deer farms in southern Wisconsin... The historic experience with deer farm fencing in Wisconsin justifies the Governor’s directive. DNR has reported 25 incidents of escapes from deer farms in 2015, 16 in 2016 and 18 in 2017. The Federation supports the enhanced fencing requirement with the choice of which method to be at the option of the farm owner. Several cervid farms in the state already have enhanced fencing. While the Federation understands that building a second 8’ high fence or a wall may be expensive alternatives for a cervid farmer, tens of thousands of Wisconsin dairy and cattle operations have successfully used electric fences to contain their domestic livestock for decades. DNR records indicate that historically 30% of deer farms escapes occurred because of unattended, open gates</p>

			<p>in deer farm perimeter fences. Therefore DATCP, in this rulemaking, should include a requirement that perimeter fences on cervid farms have electronic monitoring systems on all of their exterior gates that provide warning to the farm owners that gates are open. We support a prohibition of the movement of cervids from cervid farms in CWD impacted counties to counties that have not been impacted by CWD. A perfect example of this occurring was the discovery of CWD in a Waupaca County shooting preserve deer herd that had received deer from a Iowa County deer farm that was found to have a 20% prevalence of CWD in their deer herd....The Board should handle the continued spread of CWD in cervid farms in this state the same way that they would handle the spread of Bovine Tuberculosis or Brucellosis in the cattle of this state.”</p>
174	Nancy and Peter Minx	oppose	<p>“[M]y husband and I volunteer at Wildwood Wildlife Park. ... Being able to walk among the deer and hand feed them is amazing. ... everyday, Wildwood Wildlife Park has a tremendous amount of schools that come to the zoo to learn about nature first hand. ... Wildwood Wildlife Park has been on the CWD monitoring for over 17 years and ha[s] not had any deer test positive for CWD. ...It sounds like ... DATCP needs to blame someone and the deer farmers got the [[rap].”</p>
175	Misty Montgomery	oppose	<p>“I do not support the emergency rules for farm raised deer movement and enhanced fencing.”</p>
176	Michael Morrell	oppose	<p>“I hunt in Shawano and Marathon county.... The department of AG is making new rules to combat CWD when they still have no idea what causes the disease or even if the deer actually die from CWD. The rules that are in place right now seem to have no effect on the spread of CWD. They just found a doe (southwestern part of the state) on a double fenced fully contained deer farm that was 15 years old. That proves two points right, double fencing, and no deer brought in or left they're farm. Also, this deer was 15years old. If the [DATCP] had hard evidence of what causes CWD, or how it is spread, I'd be OK with emergency rules. But to make knee jerk reactions to a problem is not the way to solve a problem. The rule that bothers me the most is hunters transporting their deer from one county to another. The idea is to keep the spine and the head of the deer in the county it's shot in? I'm a little confused with this rule. The whitetail deer does travel from county to county. The Coyotes that eat the carcasses will also travel from county to county. The scavenger birds that will eat on the carcass will fly from county to county. ... Do they expect hunters to quarter their deer out in the fields or in the swamps where they are shot? I hunt in Marathon county and my cabin is in Shawano County. Am I to bring the deer back to Shawano to quarter it up then bring the spine and head back to Marathon county? ... Has the baiting ban helped combat the spread at all? Does anyone even know if it helps combat the disease? This new transportation rule is being brought forth with no facts, and no evidence that it will have any effect. Hunter numbers are falling every year. This will push the numbers even lower. If CWD was such an emergency, our deer population would be decimated by now. The deer population is just the opposite. Has anyone looked at the deer numbers in the eradication zones? They are huge.”</p>

177	Debra Myers Ellinger	oppose	<p>“The three-step plan will prevent the genetic resistant research to continue what has the potential to sustain the farmed and free range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”</p>
178	Thomas Oates, Commissioner, Texas Animal Health Commission Chair, TAHC Cervid Working Group Texas Parks and Wildlife CWD Working Group	oppose	<p>“Deer farmers provide an unlimited supply of CWD samples for research. Many of these samples come from the same cervid, year after year as opposed to free range deer which is sampled post mortem. Deer farmers are the key to creating a historical record of CWD in the lifespan of an individual deer. This information will be invaluable to the continued research of CWD. I make these comments because excess regulation in the private sector will eventually force these deer farmers out of business. I appreciate your consideration of these comments when adopting regulations that have such a devastating effect on private ownership of deer. As a Commissioner on the TAHC I cannot foresee placing this type of undue regulations on any [type] of agriculture.”</p>
179	Clint and Josh Odekirk	oppose	<p>We operate a small multi-generational red deer farm in Fond du Lac county.... We are also sportsmen and are concerned about the effect CWD has on the wild deer population of the state. ... Double or solid fencing is the most effective way of ensuring that CWD is not spread from captive herds to the wild population and vice versa. Though cost effective, we do not believe that three strand electric fence is effective at controlling movement of most deer species. If the animals aren't successfully separated there will be the opportunity for nose to nose contact between wild and farmed deer. Furthermore, electric fences in these settings will be prone to shorting out unless they are properly managed to control vegetation rendering them even less effective. It is highly unlikely that these fences will be properly mowed in many cases. We recommend removing three strand electric fence as an acceptable double fence strategy to ensure that farm raised and wild deer are properly separated....[C]ontrolling the movement of deer from farms that are double fenced and that are actively participating in the CWD herd status program is excessive. Once the double fence is installed CWD won't be spread to or from the farmed animals and the monitoring shows that there is low likelihood of infected animals being present in the herd.... On our farm we have double fenced pastures on two farms less than one mile apart. According to this rule, as we understand it, once CWD is identified in Fond du Lac county we would not be able to move animals from one pasture to the other. These animals are part of the same herd under the same operation. This movement restriction will have huge impacts on our operation. We recommend changing the rule to allow movement of animals on operations that are both double fenced and enrolled in the CWD herd status program. ... We sincerely hope ... that our farm may be available to be passed down to the next generation when that time comes. If it is implemented as it is currently worded our farm will be out of business and the farming legacy will be lost.”</p>
180	J. Ottwell	oppose	<p>“Shutting down deer farms in Wisconsin is not going to stop the spread of CWD. Deer farmers could end up being the solution to CWD by breeding for and producing resistant animals much like the ...the wildlife agencies have not done their part and now the free ranging herd is jeopardizing our herds and our livelihoods. The 4 most highly infected CWD counties in Wisconsin have populations that have doubled or nearly doubled since 2002 when CWD was first discovered. How could this possibly be considered an emergency that warrants destroying an entire industry? ... CWD in Wisconsin does not warrant an emergency rule!”</p>

181	Dennis Pagel	oppose	[relayed concerns in a phone call to DATCP] He owns Grandview Whitetails in Portage County He was concerned with the proposal of CWD-affected inter-county movement as this what he currently does as part of his business model. His farm was double fenced as part of its construction in 2007. He estimates that he has invested \$200,000 in his current herd.
182	Andrew Pearl	oppose	"The proposal will prevent the genetic resistant research to continue what has the potential to sustain the farmed and free range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed."
183	Jack and Suzanne Perry	oppose	"I am opposed to the emergency rules for farm raised deer movement and enhanced fencing."
184	Taylor Pfeuti	oppose	"If you choose to proceed, I hope you go to each one of the farms and help the families euthanize each and every deer and fawn and look each of them (human and animal) in the eye and explain why this is a good idea, what it will do to help, etc. because I strongly disagree that these rules will help control CWD in the wild deer population. Deer farmers are helping to research CWD and forcing them out of business is going to disrupt this research process and drag out the process of hopefully finding a cure."
185	Jeff Phillips, Central Region Director, Reindeer Owners and Breeders Association.	oppose	"[M]y wife Cindy and I own a reindeer farm ... We feel that reindeer should be exempt from [the rule...If this passes as currently written it would shut our business down. ...It would affect our community. We have spent over 15 years building Reindeer Games by investing all of our available cash and a lot of hard work. We contribute to the local economy in that we buy straw and hay from local farmers, feed from the co-op and our vet is on the farm on a regular basis. We also purchase other items that support our farm, equipment, and animals....Reindeer are important to tourism in our state. We exhibit in dozens of communities during the holiday season and we draw thousands of shoppers into these downtown areas. After they see reindeer, they buy coffee, gas, and go shopping. One of our clients collects over 22,000 toys for charity during their event. Reindeer should not be considered "captive" animals as there are no wild reindeer in the US. Reindeer have been domesticated longer than any hooved stock on the planet. Most reindeer herds are small, and like us these owners do a wellness check on each animal at least once a day ...Over 10 years ago when the state proposed that we double fence we were told that if or when CWD came into our county we would not be locked down. So we spent the money to double fence. I think that it is important that we all do what is best to control the spread of CWD while we find ways to allow commerce to continue. The income from our reindeer business is critical to the existence of the family farm."
190	Kama Amidon Pirkel	oppose	"Banning live animal movement for farm-raised deer and requiring deer farms to double fence will only put small businesses out of business, not reduce CWD. The government should be investing money into research, and if these farms can longer continue to be in business it will also stop research that is currently being conducted by farms on genetic resistance to CWD. Deer farmers are a victim of CWD, not the cause and we need to all work together to reduce the spread."

191	Jim Plaisted Executive Director, Historic Third Ward Association	oppose	<p>“This year, the Historic Third Ward Association will be celebrating the 30th Anniversary of our signature event, Christmas in the Ward. ... Last year's event was, by all accounts, the biggest and best event in recent memory attracting nearly 5,000 visitors to downtown Milwaukee ... Neighborhood retailers and restaurants benefit directly from the visitors attending the event. And in 2017, cookie sales at the event allowed us to donate over \$1,700 to Ronald McDonald House Charities of Eastern Wisconsin.... We've worked with Cindy and Jeff Phillips from Reindeer Games since 2006. ... their reindeer are an essential component of our event. Part of the allure of the event for parents is helping their children believe in the spirit of Christmas. When the children see Santa's reindeer and get to whisper their Christmas wishes to the jolly old elf himself it provides the children with a sense of magic and wonder around the holiday.... I respectfully ask you please amend the order to allow for movement of reindeer.”</p>
192	Chris Riley, Director, State Government Relations, Archer Daniels Midland Co.	oppose	<p>“The concern arises if deer farmers do go out of business with the proposed plan. ADM sells around 2500 tons of feed per year to these customers. I understand there is a lot more involved than that, but feel there are facts that are being overlooked and encourage the administration to continue to work with Whitetails of Wisconsin, of which ADM Animal Nutrition is a member.”</p>
193	Amy Robinson	oppose	<p>“These changes would put farmers out of business and destroy an industry without helping anyone. The professional cervid farmers of the state and country are working to gain knowledge and understanding and control of this disease. Killing the industry and putting these people out of business will only hurt their research. Please reconsider inhibiting movement with rules that make no sense and help no one. Listen to their plans and help them to find answers that will help all deer, farmed and wild. Make Wisconsin better not worse. [From] a concerned veterinarian and citizen.”</p>
194	Carley Rodenkirch	oppose	<p>“Deer farmers go through great lengths to avoid getting CWD and comply with all the regulations to reduce the chances of getting it. We are not the enemy, we should not be the scapegoat to this issue. How would it look to demolish an entire Wisconsin industry which then trickles into so many others, and then be no closer to eliminating CWD? ... [O]ther livestock farms are not being faced with the possibility of not being able to move their animals or animal products like beef, sheep or dairy farms (when there are diseases that can occur within their industries), so it's not right that we are being discriminated against with this proposal... I want to talk you about who this decision affects: ... the little kid whose parents' farm has to euthanize everything on it because they can no longer feed the animals because they can't sell them because an unfounded proposal says they can't move them. I... the young man's dream [that] will die right before it ignites into making a difference in this industry. ... the farmer and his wife who can't afford rent or feed because their farm will go under. ... the young man who won't be able to carry on in his father's footsteps, to pursue his passion of working with animals and take over the family farm. These are the impending realities of Wisconsin families in this room and those who couldn't make it today should this proposal pass. Do we really want to destroy families and farms on a guess- on an assumption not founded in science, that deer farmers are to blame for perpetuating CWD?”</p>

196	Ron and Terri Rodenkirch	oppose	<p>“... This issue is 100% political and has no science base. As farmers yourselves, we hope the board understands this issue from our point of view. Groups against deer farming keep bringing up escapes. They cannot even get the actual number correct (shows how much their own bias is playing into their argument). Last year there [were] 20 escapes, not 30, not 25. These animals were all euthanized and tested for CWD. No cost to the state or anyone besides the farmer, no CWD found. They seem to think these numbers are significant, 20 escapes is 1% of 1% of the captive cervid population in Wisconsin. If escapes are the issue why should farmers double fence their entire property? Would gates not be sufficient? Or are they worried about wild CWD positive animals infecting farm raised deer?”</p>
197	Ryan Rodenkirch	oppose	<p>“In 2001, when CWD was first identified, researchers stated in 15 years CWD would wipe out the population. 2018 has brought no population decrease due to disease, no transfer to humans, and bias sampling techniques... CWD is a political disease... [W]here is the science? I have yet to read a published journal showing farmed cervids transferring cwd to the wild. Is the fencing proposal meant to protect farmed cervids from those in the wild? The wild currently has a CWD prevalence rate many times higher than captive cervids. The state has also been moving in and releasing untested elk into the wild for years. Why would farmers be responsible for paying for any of this when our animals are regulated and properly managed under a federal program? Hunter harvest sampling is not a solution to CWD. My county currently has 1 positive wild deer harvested in 2017, and no positive captive animals. Why should this affect my business and animals? How could I have prevented this?”</p> <p>“Mr. Meyer, the head of the Wisconsin Wildlife Federation, claims to be the voice of 600,000 hunters and 200+ affiliate clubs. However, I have made contact with some of these groups listed as affiliates under the WWF banner and they are not familiar with Mr. Meyer, and are unaware of the opinions he holds and also presents on their behalf. It appears most groups receive an affiliate membership to the WWF for projects they have done for their own organization, and no assistance from the WWF. ... [I am upset that] [someone who claims to have the voice of many ... is relaying this to the board for decisions that affect livelihoods and Wisconsin's resources, but is more geared towards personal opinion and politics. . I would request that the board do their due diligence on this matter.”</p>
199	Shelly Rose	oppose	<p>“The three-step plan will prevent the genetic resistant research to continue what has the potential to sustain the farmed and free range whitetail deer populations in [Wisconsin] long into the future. Potential cures for CWD may be lost if these proposals are passed.”</p>

200	Gretchen Schmidt	oppose	<p>"I am a veterinarian and a deer farmer ...In 1994 we bought a family dairy farm and repurposed it into a deer farm. This kept the acreage from being developed into a housing development..... In order to combat this disease I think we should learn from the USDA's genetics based flock clean-up plan for Scrapie in sheep. Scrapie is the oldest known TSE and through genetic testing it has been controlled and is no longer a threat to the sheep industry. Current research in cervid genetics is ongoing and we all know that some cervids such as mule deer are very susceptible to CWD while others such as fallow and red deer are not. There are some markers in white-tail deer that look promising for resistance to CWD. These are being identified and if prove to be true would be an excellent way to reduce the disease in the white tail herd by introducing these genetics. W...[D]eer farmers are supporting this research through our foundations so both the farmed deer and the wild herd will benefit. If you destroy our industry, this source of funding will disappear." "I raise red deer which are very resistant to CWD.....Not all deer/elk farms raise animals solely for hunting purposes ...s. Farm-raised venison is a major source of the income for many deer farms. We transport the live animals to a state approved facility outside of the county where they are inspected on the hoof, humanely slaughtered, post-mortem inspected by a state inspector, processed, and vacuum packaged for resale to the public and restaurants. If we are not allowed to transport these animals, the state inspectors, the processing facility, packaging, labeling, farmers markets, and restaurants that serve this venison will lose income. This rule for the inability to transport live animals if a CWD positive deer is detected in the county of origin, has not been well researched for its ramifications to many associated industries."</p>
203	Jerry W. Schooff	oppose	<p>"I do not support the emergency rules for farm raised deer movement and enhanced fencing".</p>
204	Marc A. Schultz, La Crosse County Conservation Alliance	support	<p>"The La Crosse County Conservation Alliance supports three proposed [CWD] rules regarding prohibiting inter-county movement of harvested unprocessed deer; requiring double fencing for deer farms and prohibiting the movement of deer farm deer from CWD counties.... We support the stated positions of both the Wisconsin Conservation Congress and the Wisconsin Wildlife Federation regarding these proposed rules....The Alliance encourages the state of Wisconsin to expand statewide to every county the existing CWD detection and testing program and also to provide for convenient and safe disposal of deer carcasses in every Wisconsin county."</p>
205	Heather Schwark	oppose	<p>The rule "will destroy many people's businesses and livelihoods that in several cases the farmers and owners have spent more than half of their lives to build. Please work with these farmers to come up with a better solution to CWD."</p>
206	Julie Schwartzlow	oppose	<p>"I do not support the emergency rules for farm raised deer movement and enhanced fencing."</p>
207	Charly Seale, Executive Director, Exotic Wildlife Association Vice Chairman, Farmed Cervid Committee of the United States Animal Health Association.	oppose	<p>"Research has shown that there is very little nose to nose contact among cervids so therefore double fencing, which is cost prohibitive for most farmers, will be of little value in the overall plan for stopping the spread of CWD...Double fencing will carry a tremendous negative appearance to the public. Making the private farms double fence while there is nothing on the free range side of the issue will definitely make the public believe that CWD and its spread is from the breeder side of the double fence. Genotyping farmed deer and the science learned will most definitely stem the flow of CWD in the future as well and preserve the natural resource....[A]reas that are showing a decline in [deer] population can be traced to the predators and human encroachment in those areas [rather than CWD]... Please use the best known science we have available and avoid placing this rule into effect through emotion and junk science."</p>

“No deer farmer wants to contract CWD. It is a death sentence for a farm. Everything we have invested into our farms can be jeopardized with just one CWD positive test and that is why we go above and beyond to prevent CWD.” “Research shows there is very little fence line contact and therefore a single fence poses a very low risk for contributing to the spread of CWD. The proposed rule to force all deer and elk farmers to double fence is a government overreach that is designed to put many hard working farmers out of business. ... In fact, there were two facilities this past year that tested positive for CWD (1 in Wisconsin and 1 in Michigan) that had been double fenced for 12 years and were closed herds for more than 9 years (meaning they had not brought in any live animals for 9 years) and yet they tested positive for CWD Both of these farms were following the rules to the T and were in total compliance with the rules governing our industry. Research has shown that birds of prey and predators can ingest the prions and then spread the prions. ... Our industry is asking this board to evaluate the science and not carry forward a rule that was implemented due to a small group of individuals who are uninformed of the science regarding CWD. Please do not force an unfunded mandate on an industry that is doing everything possible to protect our animals from the diseased free ranging herd. We also do not see a need to spend taxpayers' dollars to help fund a double fence mandated by the state when it will not prevent CWD from continuing to spread throughout the state.” “[H]unters from 49 different states and most all of northern Wisconsin flocked to the 4 most highly infected counties in Wisconsin to hunt, so not all hunters are listening to the CWD gloom and doom spouted by a few.32,000 hunters must not be too concerned about eating the meat because most did not test their deer for CWD. {Hunters flocked to southern Wisconsin} because there are trophy deer unlike northern Wisconsin where the wolves have decimated the population.CWD infected carcasses are being transported all over the country and not much is being done to educate these hunters of the risk carcasses pose. ...The double fencing alone is estimated to be well over \$20 million so that is more than a moderate to significant economic impact. For the hunting ranches, just the cost of bulldozing the perimeter to be able to put up an enhanced fence, the cost is going to be astronomical. This proposed unfunded mandate ... will put good, hard-working people out of business just to say “we did something”. ...The problem with government today is they impose laws that do not cost them anything individually, but the rules they impose many times have severe consequences for those they are regulating. This rule will not personally cost any of you anything, but it will cost our industry everything...The Governor’s additional fencing proposal ... puts forth a negative perception of deer farmers to the general public, making it look like we must be the problem if all of these additional regulations are necessary. Emotional politically driven ideas that are not founded by science may be appealing to the uninformed public ... Social media and governmental agencies have not accurately portrayed the problem and by proposing unfounded mandates, it further damages the deer industry ...The cervid industry has spent over a decade working to prevent CWD, but unfortunately the wildlife agencies have not done their part. They have allowed CWD infected carcasses to move freely all over the country and have allowed free ranging, unmonitored and untested elk to be released into the wild in non-affected counties. In the county that these elk originated in Kentucky, they only tested one elk for CWD. Elk are known to travel greater distances than whitetail deer so now we have these elk traveling to CWD counties and then traveling back to non-CWD affected counties. ...The genetic research by Dr. Nicholas Haley to develop CWD resistant animals is very promising. I was amazed to realize how many of the resistant animals I actually have in my herd. Deer farmers can now take this knowledge and create resistant herds in a short amount of time. We are asking our government to allow us to remain in business in order to advance this research that could be the solution to CWD. Governor Walker hired Dr. Kroll to develop a CWD management plan (and it’s working). Last year, all parties with a vested interest in CWD were invited to the table to review the CWD management plan. Dr. McGraw [said] that deer farmers are doing everything they can to prevent CWD from entering their farms. He explained all the rules that are already in place to help prevent the spread of CWD on our farms. He relayed the message that our farms are very low risk due the high regulation of our industry. ... It was agreed by all parties (even George Meyer) that a double fence was not necessary with the exception of an electric fence for the CWD-positive facilities that choose to stay in business. [DATCP] was charged with the task to develop the electric fence protocol, not the DNR even though the DNR regulates whitetail deer fencing. We... ask [that] the fencing portion of Governor Walker’s proposal stay with the DATCP. They already do the double fence inspections and have language in the rule for double fencing. The DNR currently only inspects one fence and we would like it to stay that way in order to simplify the process for us and the departments.... At all of the hearings, there have only been a total of four people in favor of the Governor’s proposals.”

218	J. B. Sensenbrenner	support	<p>“In addition to the more restrictive fencing measures for deer game farms, I urge you to strongly consider establishing deer kill registration stations. The check-in stations will allow observation of all deer killed and also CWD testing. The current system of phone or internet deer kill check in does not allow for physical observation and it does not work for hunters in rural areas. Authorized check in stations and tagging give the state the best ability to monitor and manage CWED and have accurate kill data. I encourage you to establish the authorized check in stations for the 2018 hunting season.”</p>
221	Richard A. Sitariski	oppose	<p>“I came to Wisconsin from Illinois to start an elk farm 15 years ago. ... I am in the process of starting a much-needed new butcher shop business ... If after following all the current rules and regulations, I will now be forced to comply with additional very costly and burdensome regulations, I cannot see the logic in moving forward. Where will the new rule and regulations ever stop? This appears to be a politically motivated mandate and good farmers like me will become the innocent fatalities of this political move. ... I am more concerned with Lyme’s disease than I have ever been about CWD? Lyme’s disease has had severe effects on many of my friends here in WI. Yet you don’t ever hear about Lyme’s disease being a concern of government regulation.... Cervid farmers are very interested in providing the farming community alternatives to the struggles that traditional farms are facing. Cervid farming is better for marginal land, provides competitive alternative products, and can become an American farm success story if the government allows this to happen.”</p>
223	Alan Smith National Legislative Affairs Director, Zoological Association of America	oppose	<p>“[T]he Zoological Association of America is the second largest trade association in the zoological sector. ... the proposed rules... trade hypothetical public protection, which [is] unjustified by animal veterinary science, for serious financial burdens which threaten to make many small businesses uneconomic. In the case of Wildwood [Wildlife Park], for instance, which already is double-fenced externally, the potential burden of doing the same for every single enclosure where the deer are allowed to be inside the park would effectively terminate the critical experience of interaction for all of our visitors. For what do we make the sacrifice of 20,000 experiences of just students on field trips every year? ... All of the research to date shows not only that there is little contact at the fence line in the first place, and that double-fencing has not been shown to be efficacious. ... Combining the two proposals would mean that movement within the state would be prohibited whether or not a facility is double-fenced, which seems to us to be the classic worst kind of government regulation. ... [T]he proposed regulation is only designated as an emergency because the huge and emerging negative reaction from stakeholders in a multimillion dollar industry illustrates the difficulty of doing this through a process of thoughtful consideration. The breadth of the opposition demonstrated at the hearings and the rural radio talk shows should have signaled that this is an area where the state should be as well-informed as possible before doing something [that] offers demonstrable harm to gain an illusory public benefit.”</p>

225	Brian Smith	oppose	<p>"I currently own a small deer farm near Osseo, WI called Woodhaven Whitetails. ... Most media sources have no clue on the disease and the people that read the media information have only what they read to believe. Yes, as deer farmers we transport deer; some farmers more than others ... Double fencing would cost me around \$10,000-\$15,000. ... Some of the Wisconsin hunters will quarter their harvest at the harvest site. But let's be realistic, as we know only a portion will. The ones that quarter their harvest in the field, will leave the carcass, to be used as food for other animals such as birds, coyotes, etc., which will be consumed and then spread to various other parts of that specific area. thousands of animals will be transported annually into Wisconsin, from out of state hunts, with minimal or no requirements on their transport or carcass disposal, and, <i>even if</i> rules are implemented to address animals brought in from out of state, what about the animals traveling through the state from one state to another after a hunting trip. Just think of how many vehicles come and go at the local gas station, which is the same one that the local farmer stops at... [L]eaving the spine and other parts in the field is a terrible idea. What better way to spread the disease, but to leave those items exposed for birds and other animals to spread around. In regards to allowing a carcass to be moved if only going to a taxidermist or processing plan – how will that be monitored? You know that once that animal is in the vehicle, it will be very difficult to track. ... I have a pretty small deer farm, which includes 9 does and a couple generations of bucks. What is exciting is that I have been working with genotype testing on my breeding animals for CWD resistance. Out of my 9 does, I have two that test 226K/96S genotype! That specific genotype has a <0.1% CWD susceptibility rate and <0.3% of deer have that specific genotype ... and I own two of them. My goal would be to use these two does as the foundation of my future breeding herd and in 3- 5years have an entire herd that consists of CWD resistant animals. Who knows, maybe these does are the foundation of a future CWD resistant state herd.... Our deer farm spends annually \$6,000 on feed and another \$10,000 to operate. We will be forced to put down 23 healthy deer."</p>
228	Dwayne Splan	oppose	<p>"I have been doing deer nutrition work for 5 years with deer farms in Wisconsin. ... Having no animals move to other farms will cause a lot of smaller farms that don't have hunting preserves to go out of business. What do they do with the bucks that they raise. Will you buy all these animals to slaughter? ... The rule [concerning] moving any deer shot during hunting season from one county to another cannot be enforced. A lot of people have camps and lease land in different counties... There has been some research with lichens that show a glimmer of hope. I have tried for a year to get the USGS to look at other products that could help ...Dr. Frank Bastian at LSU... thinks CWD starts as a bacterial challenge. We have had some lowered CWD cases on a farm [where] we have been doing this? Just anecdotal but promising. [T]here are feed related companies that are looking on how to lower cases in fenced farms, but the market isn't big so they don't want to spend a lot of money. There is an Arizona lab that is showing some deer are immune to CWD? How about spending some research money on some alternative theories. I [have] one for you."</p>
229	Emma Steinhauser	oppose	<p>"I do not support the emergency rules for farm raised deer movement and enhanced fencing."</p>

230	Michael Strobush	oppose	<p>“[I] am a licensed and accredited large animal veterinarian practicing for the last 35 years in central Wisconsin. ... Currently farmed deer can only move in the state to other deer farms or hunting preserves with a health certificate issued by the herd veterinarian. The system that we currently use allows deer farmers to move deer from a farm with a positive test to hunting ranches in a way to market their deer. No taxpayer money is needed for indemnity purposes as their farm is not depopulated. Prohibiting the movement of farm raised deer in affected counties will not allow these farms to sell any of their animals which will result in severe financial losses. ... [I]f you look hard enough for a disease you will find it. ... If wild whitetail deer were tested at the same frequency as farmed deer, ... CWD would be found throughout Wisconsin. Hunter killed deer that are tested for CWD each fall represent a very small percentage of the deer killed annually. This number of tested deer compared to the actual live population.... A new herd in Dane county that was double fenced since 2009 recently was found to have CWD. There have been other double fenced farms and hunting ranches that suddenly test positive for CWD after years of testing.... Deer in Wisconsin rarely die from CWD. They do not live long enough to develop the symptoms of the disease. They can test positive as young as 2 years old but can take years to die from the disease. There is a tremendous amount ... that we do not know about CWD.”</p>
232	Glenn Stumpf	oppose	<p>As a hunter and environmentalist I am strongly in favor of fact-oriented rules and regulation like the banning of baiting and feeding of wild deer. ... A very good friend of mine owns and runs an elk farm with about 35 elk. He has installed a double fence, at great expense to him, so that CWD could never be transmitted from wild deer to his elk. Why would he not be allowed to take his animals to be slaughtered?</p>
233	Nicole Timm	oppose	<p>“I do not support the emergency rules for farm raised deer movement and enhanced fencing.”</p>
234	Mark Utzig	oppose	<p>“... We are ... a Wisconsin licensed deer farm because of a reindeer we have on our [Christmas tree] property Our reindeer is a big draw for us during the Christmas season especially for our customers coming all the way from the northern suburbs of Chicago.... [W]hat we really sell is a Wisconsin Ag-Tourism experience of starting out the holiday season ... It's amazing how many people really appreciate coming and visiting our farm and petting zoo... As a resident of Wisconsin, I don't think we realize how disconnected suburban America is now days with agriculture and the family farm. ... [O]ur farm is a little different than most deer farms because we are not in the business of buying and selling deer. Our deer are more like pets and are esthetically appealing to our customer base at the farm and are frequent subjects of customer photo shoots. ... I think double fencing makes sense because it protects captive CWD-certified deer from unknown, untested wild deer Many of the Deer Farms that I know already have implemented a double fence in order to comply with current DATCP rules and also to protect their investment. ... Maybe the State or the DNR can come up with some program to help or financially assist these larger deer farmers to double-fence their property. ... Does it seem fair that Wisconsin residents owning Wisconsin licensed deer farms [that] have been paying Wisconsin taxes and complying with current DATCP regulations be banned from moving their registered herd while deer in the Wisconsin wild are free to roam wherever they want to with little accountability or testing being done spreading the disease throughout the Wisconsin countryside? ... Many farmers trade their bucks with other farmers to prevent in-breeding which in itself can cause other health issues and diseases. The proposed ban on the movement of farm-raised deer would abolish this practice thus causing more in-breeding within the captive herd In the wild, bucks roam freely breeding at will, populating the diseased portion of the wild herd with no accountability. ... I see dead deer alongside the road due to vehicle deer hits. Many of these dead deer have been laying in our Wisconsin road ditches for days and weeks. I always wonder how many of those deer were infected with CWD and how many disease prions are laying there contaminating the area.... I asked a biology student in passing how we could get control of the spread of CWD. After some thought he suggested that in theory we need to split the unhealthy animals from the healthy ones and then eradicate the unhealthy ones. This way we would have the healthy animals left over to re-populate with. The takeaway here is that we work with our controlled herds and eradicate the uncontrolled.”</p>

236	Nakitta Vaade	oppose	“Please do not support the emergency rules for farm raised deer movement and enhanced fencing.”
237	Samuel Vainisi and Gretchen Schmidt	oppose	The proposed plan is politically motivated and is too late to be effective. Electric fencing does not necessarily prevent nose-to nose contact. Preventing movement of live deer will crook deer farming but will not be effective as eventually CWD will spread to all countries. APHIS dis mystified as to how the single red to was infected with CWD. Whitetail deer have been identified that are resistant to CWD, showing a delayed onset of 6-8 years rather than 1-3 years. Deer farmers are currently buying these genetically resistant deer. Scrapie, a prion disease in sheep, was eliminated in such fashion.
238	Sam Vainisi	oppose	“I am a veterinarian and have been a red deer farmer for 24 years.... Shutting down the movement of farm raised deer if only one report of CWD is found in your county... makes no sense at all. ... We have been double-fenced for 16 years. No infected deer will ever make nose to nose contact with our herd; yet we are not naive enough to think that CWD prions could not gain access to our farm via birds or wild varminits or God knows whatever.”
239	Dan and Joni Van Ooyen	oppose	“We have been raising whitetail deer for 30 years. We have about 17 acres high fenced which is sectioned off into breeding pens. ... We have 100+ adult deer and expecting 50+ fawns this spring. ... Our deer farm spends \$45,000 per year on feed and \$25,000 in operating expenses... We will be forced to put down our entire herd with additional expenses of close to \$10,000 just to CWD test the adult animals. ... To double fence our farm it will cost a minimum of \$100,000 to add the additional fencing and redesign some of the interior pens.”
240	Zach Waechter	oppose	“I am a Wisconsin hunter... The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”
241	Josh Webber	oppose	“I am a Wisconsin hunter... The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”
242	Dan and Diane Weber	oppose	‘We are the owners... of Wilderness Walk [which is] a privately owned zoo that has been in existence for 50 years. We ... have owned the zoo for 18 years. ... These new rules ... will totally shut down our business (leaving 25 people unemployed) or force us to slaughter all the cervids in our possession ... Double fencing would be impossible to do in this setting and situation, besides never being able to pay for it. The deer are a significant part of our business... If [we are] forced to kill all our deer, every TV station (MN and WI near us), newspapers, radio stations, will be notified to witness and film the slaughtering of our herd. Along with huge posters telling who is making us do it. ... it has been also discussed the possibility of fencing off bovines, goats, and etc... That would mean every dairy farmer, beef farmer, and hobby farm, would have to double fence all their herds against the wild deer herds. Which would mean many lives would be ruined and not to mention Wisconsin would no longer be the dairy state! Not to mention the feed businesses that would go out of business. ... This also means DNR would NOT be able to move any elk from county to county or bring in anything from another state. ... Can anyone definitely prove and provide data that [CWD] isn't passed through a raccoon, squirrel, and bird and shows up as a different form of disease[]? No!’

244	Brent Westphal	oppose	<p>"I am an avid hunter and outdoorsman....The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future"</p>
245	Steve Westphal	oppose	<p>"I am a past whitetail deer farmer [and] an avid hunter and outdoorsman... The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed."</p>
246	Brian Wolf	oppose	<p>"If there is an emergency, it is not in the 'fenced-in' elk industry in Wisconsin. There have been few CWD positive animals found to date in this population, 1 of which was an imported elk from Minnesota. ...DNR must ..do more. Additional and extended deer hunting seasons will reduce the deer population and the spread of CWD. Burying animal remains could possibly decrease the CWD prion spread by limiting the exposure to carnivores feeding on the carcass. Incineration of animal remains is needed if the animal is suspect of disease or if burying the carcass is impossible to remove the CWD prion from the landscape. The governor has asked the cervid industry to do their fair share to control CWD. The cervid industry has already been doing its fair share.. [The ban on movement] would eliminate my 2 sources of income: [s]elling elk meat at my local farmers markets and ... [s]elling my bulls to a hunt ranch. ... I would continue to have my usual expenses of making hay, buying feed, watering, registration and vet bills." [Mr. Wolf appended a letter from his veterinarian attesting to the health of his herd.]</p>
249	Kraig Wurst	oppose	<p>"For every case of CWD you find behind fence there are a hundred in the wild already. All that regulation would do is put deer and elk farmers out of business. As for the movement issue, I don't see a risk when the farmed herds are tested as vigorously as they are. What needs to be clamped down on are the carcass movements of wild deer before CWD testing."</p>
250	Jim Wysocki	oppose	<p>"This rule as proposed will lead to the closure of approx. 50% of deer farms because they raise deer but do not have hunting facilities.... Wild deer don't pay attention to county lines This is a proximity issue to the closest CWD-positive location to the deer farm location. Please set the "affected area" based on deer travel distance not county lines. County lines are easier but then you needed to add within ten miles of an adjacent county. Please use science with a rule that states a deer farm within ten miles of a wild CWD find is in an affected area....Double fencing for the spread of CWD is mostly political and heavily requested by the conservationist community. I understand that those are real forces and understand this may be part of the public compromise but let's make sure we are realistic in the rules. There is no way that many miles of fence can be installed before 2018 hunting season. The[re] are not that many installers. It is unfair to make the farmers install fencing to protect the wild population from a disease free herd at the owner's expense. There needs to be grants that will pay for this cost. A maximum of 16' spacing between fences does nothing to prevent escapes The corners are automatically wider than 16'. Adding a second fence where it was not designed for it and still managing to take care of the land between the fences to clear growth will be problematic. Please remove the maximum distance or at least increase it to 100". This would allow me in places to close off to deer a penned area rather than building or moving an existing fence. I agree with not transporting deer skulls and spines from the area the deer was harvested but it does not go far enough. This rule is designed to reduce a known vector of CWD transmission. Carcass disposal sites should be set up so that all carcasses (wild and captive) could be landfilled to keep the prions from coming into contact with other wild animals. Locating collection points that then haul to landfill that will keep covered and buried especially in affected areas is the surest way to stop spread ... How does a deer hunter that drive 30 miles from home and harvests a deer quarter it in November? Is the hunter supposed to do in at the kill site? Next to his vehicle along the road? Or take it home crossing the county or ten mile radius and then quartering it? Then does the carcass go back to the hunting site, back of the house, a rural road in the middle of the night, the garbage can wrapped up well? How would we enforce not moving deer out of the county if some were moving only a short distance? If we provide a location I think people will also begin to offer hunters a quartering service for a fee as well. "</p>

252	Robert Zurfluh	oppose	“I am a farmer, whitetail hunter and outdoor enthusiast... The proposals will prevent the genetic resistant research to continue that has the potential to sustain the farmed and free-range whitetail deer populations in Wisconsin long into the future. Potential cures for CWD may be lost if these proposals are passed.”
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Academic, Government and Industry-Authored Materials

Various individuals forwarded articles and abstracts authored by professional academics, industry groups, or governmental entities.

page	Author and title	Summary or abstract
253	Jason C. Bartz et al., “The Host Range of Chronic Wasting Disease Is Altered on Passage in Ferrets” (supplied by Rich Forrest)	“Chronic wasting disease (CWD), a member of the transmissible spongiform encephalopathies (TSEs), was first identified in captive mule and black-tail deer in 1967. Due to the failure to transmit CWD to rodents, we investigated the use of ferrets (<i>Mustela putorius furo</i>) as a small animal model of CWD. The inoculation of CWD into ferrets resulted in an incubation period of 17–21 months on primary passage that shortened to 5 months by the third ferret passage. The brain tissue of animals inoculated with ferret-passed CWD exhibited spongiform degeneration and reactive astroglycosis. Western blot analysis of ferret-passed CWD demonstrated the presence of PrP-res. Unlike mule deer CWD, ferret-passed CWD was transmissible to Syrian golden hamsters (<i>Mesocricetus auratus</i>). Increasing the passage number of CWD in ferrets increased the pathogenicity of the agent for hamsters. This increase in host range of a field isolate on interspecies transmission emphasizes the need for caution when assessing the potential risk of transmission of TSEs, such as bovine spongiform encephalopathy, to new host species.”
258	Adam L. Brandt et al., “Prion protein gene sequence and chronic wasting disease susceptibility in white-tailed deer (<i>Odocoileus virginianus</i>)”	“The sequence of the prion protein gene (PRNP) affects susceptibility to spongiform encephalopathies, or prion diseases in many species. In white-tailed deer, both coding and non-coding single nucleotide polymorphisms have been identified in this gene that correlate to chronic wasting disease (CWD) susceptibility. Previous studies examined individual nucleotide or amino acid mutations; here we examine all nucleotide polymorphisms and their combined effects on CWD. A 626 bp region of PRNP was examined from 703 free-ranging white-tailed deer. Deer were sampled between 2002 and 2010 by hunter harvest or government culling in Illinois and Wisconsin. Fourteen variable nucleotide positions were identified (4 new and 10 previously reported). We identified 68 diploypes comprised of 24 predicted haplotypes, with the most common diploype occurring in 123 individuals. Diploypes that were found exclusively among positive or negative animals were rare, each occurring in less than 1% of the deer studied. Only one haplotype (C, odds ratio 0.240) and 2 diploypes (AC and BC, odds ratios of 0.161 and 0.108 respectively) has significant associations with CWD resistance. Each contains mutations (one synonymous nucleotide 555C/T and one nonsynonymous nucleotide 286G/A) at positions reported to be significantly associated with reduced CWD susceptibility. Results suggest that deer populations with higher frequencies of haplotype C or diploypes AC and BC might have a reduced risk for CWD infection - while populations with lower frequencies may have higher risk for infection. Understanding the genetic basis of CWD has improved our ability to assess herd susceptibility and direct management efforts within CWD infected areas.”

278	Donald S. Davis et al. (American Cervid Alliance), "Current Scientific Knowledge about CWD, April 2018" (supplied by Lisa Clark; Laurie Seale)	<p>A review of the literature based on actual data (not predictive models) clearly shows that that any past combination of quarantines, containment zones, surveillance zones, depopulation, elective harvest, increased harvest limits, supplemental feeding bans, baiting bans, bans on the importation of live cervid species, bans on the importation, of carcasses, bans on the importation of trophies, and bans on urine based lures, have not been effective in preventing, controlling, or eradicating CWD in any State. These programs have cost in excess of \$100,000,000 of public funding and the killing of thousands of deer without any measurable positive results.</p>
309	Horace Gore, "Research shows human prions resist chronic wasting disease." (supplied by Lisa Clark and Laurie Seale)	<p>"A recent study by a research team at UC San Diego has shown that a small loop in the human prion protein prevents corruption of human proteins when exposed to elk prions. This study, published Feb. 23, 2017 in the Journal of Clinical Investigations identified the small loop in the human prion protein that confers resistance to chronic wasting disease. ... We suspected that a loop in the human prion protein structure may block the cervid (elk) prions from binding, as the sequences did not appear to be complete." Sigurdson said. To test this hypothesis, Sigurdson and her team developed a transgenic mouse that expresses a prion protein that is identical to the human version—except for a small loop that was swapped out for the elk sequence. When these mice were exposed to the cervid (elk) prions, they developed chronic wasting disease (CWD). In contrast, control mice expressing the normal human sequences, resisted infection when exposed to the same material—just as humans seem to, even those who consume venison meat."</p>
311	N.J. Haley et al., "Estimating chronic wasting disease susceptibility in cervids using real-time quaking-induced conversion."	<p>In mammals, susceptibility to prion infection is primarily modulated by the host's cellular prion protein (PrPc) sequence. In the sheep scrapie model, a graded scale of susceptibility has been established both in vivo and in vitro based on PrPc amino acids 136, 154 and 171, leading to global breeding programmes to reduce the prevalence of scrapie in sheep. Chronic wasting disease (CWD) resistance in cervids is often characterized as decreased prevalence and/or protracted disease progression in individuals with specific alleles; at present, no PrPc allele conferring absolute resistance in cervids has been identified. To model the susceptibility of various naturally occurring and hypothetical cervid PrPc alleles in vitro, we compared the amplification rates and amyloid extension efficiencies of eight distinct CWD isolates in recombinant cervid PrPc substrates using real-time quaking-induced conversion. We hypothesized that the in vitro conversion characteristics of these isolates in cervid substrates would correlate to in vivo susceptibility - permitting susceptibility prediction for the rare alleles found in nature. We also predicted that hypothetical alleles with multiple resistance-associated codons would be more resistant to in vitro conversion than natural alleles with a single resistant codon. Our studies demonstrate that in vitro conversion metrics align with in vivo susceptibility, and that alleles with multiple amino acid substitutions, each influencing resistance independently, do not necessarily contribute additively to conversion resistance. Importantly, we found that the naturally occurring whitetail deer QGAK substrate exhibited the slowest amplification rate among those evaluated, suggesting that further investigation of this allele and its resistance in vivo is warranted.</p>

312	Timothy D. Kurt et al. "Human prion protein sequence elements impede cross-species chronic wasting disease transmission."	<p>Chronic wasting disease (CWD) is a fatal prion disease of North American deer and elk and poses an unclear risk for transmission to humans. Human exposure to CWD occurs through hunting activities and consumption of venison from prion-infected animals. Although the amino acid residues of the prion protein (PrP) that prevent or permit human CWD infection are unknown, NMR-based structural studies suggest that the P2-a2 loop (residues 165-175) may impact species barriers. Here we sought to define PrP sequence determinants that affect CWD transmission to humans. We engineered transgenic mice that express human PrP with four amino acid substitutions that result in expression of PrP with a p2-a2 loop (residues 165-175) that exactly matches that of elk PrP. Compared with transgenic mice expressing unaltered human PrP, mice expressing the human-elk chimeric PrP were highly susceptible to elk and deer CWD prions but were concurrently less susceptible to human Creutzfeldt-Jakob disease prions. A systematic in vitro survey of amino acid differences between humans and cervids identified two additional residues that impacted CWD conversion of human PrP. This work identifies amino acids that constitute a substantial structural barrier for CWD transmission to humans and helps illuminate the molecular requirements for cross-species prion transmission.</p>
325	D.E. Lantz, Deer Farming in the United States," U.S. Department of Agriculture Farmers Bulletin 330 [1908] (supplied by Laurie Seale)	<p>The domestication of deer and elk offers an interesting field for experiment, as well as remunerative returns for the investment of capital. The wapiti and the Virginia deer can be raised successfully and cheaply under many different conditions of food and climate. The production of venison and the rearing of both species for stocking parks may be made profitable industries in the United States. Instead of hampering breeders by restrictions, as at present, State laws should be so modified as to encourage the raising of deer, elk, and other animals as a source of profit to the individual and to the State. Safeguards against the destruction and sale of wild deer in place of domesticated deer are not difficult to enforce. For this purpose, a system of licensing private parks, and of tagging deer or carcasses sold or shipped, so that they may be easily identified, is recommended. It is believed that with favorable legislation much otherwise ,waste land in the United States may be utilized for the production of venison so as to yield profitable returns, and also that this excellent and nutritious meat, instead of being denied to 99 percent of the population of the country, may become as common and as cheap in our markets as mutton.</p>

345	S.J. Robinson et al., "The role of genetics in chronic wasting disease of North American cervids." [abstract only supplied]	<p>Chronic wasting disease (CWD) is a major concern for the management of North American cervid populations. This fatal prion disease has led to declines in populations which have high CWD prevalence and areas with both high and low infection rates have experienced economic losses in wildlife recreation and fears of potential spill-over into livestock or humans. Research from human and veterinary medicine has established that the prion protein gene (Prnp) encodes the protein responsible for transmissible spongiform encephalopathies (TSEs). Polymorphisms in the Prnp gene can lead to different prion forms that moderate individual susceptibility to and progression of TSE infection. Prnp genes have been sequenced in a number of cervid species including those currently infected by CWD (elk, mule deer, white-tailed deer, moose) and those for which susceptibility is not yet determined (caribou, fallow deer, sika deer). Over thousands of sequences examined, the Prnp gene is remarkably conserved within the family Cervidae; only 16 amino acid polymorphisms have been reported within the 256 amino acid open reading frame in the third exon of the Prnp gene. Some of these polymorphisms have been associated with lower rates of CWD infection and slower progression of clinical CWD. Here we review the body of research on Prnp genetics of North American cervids. Specifically, we focus on known polymorphisms in the Prnp gene, observed genotypic differences in CWD infection rates and clinical progression, mechanisms for genetic TSE resistance related to both the cervid host and the prion agent and potential for natural selection for CWD-resistance. We also identify gaps in our knowledge that require future research.</p>
345	Lindsay Thomas Jr. (Quality Deer Management Association), "This Map Spells Trouble for the Future of Deer Hunting" (supplied by Laurie Seale)	<p>"In the 2016-2017 hunting season, more than 32,000 whitetails were killed by hunters in the four Wisconsin counties with the highest incidence of CWD in the state - Dane, Iowa, Richland and Sauk counties. The red dots on the map above are the home zip codes for every hunter who harvested at least one of those deer. Yes, hunters from 49 states killed deer in Wisconsin's CWD hotbed in 2016-17....Most of these deer were not tested for CWD....I've learned from Wisconsin DNR that they tested 2,291 deer from the four counties in the 2016-17 season, or 7 percent of the harvest. ... How many of those untested deer probably had CWD? Well, of the 2,291 that were tested, 17 percent were positive. This suggests approximately 5,000 of those untested deer were also positive."</p>

354	U.S. Department of Agriculture Animal and Plant Health Inspection Service, "The genetics of scrapie susceptibility."	<p>"Scrapie does not occur in any sheep of any genotype that has not been exposed to the infectious agent. However, once exposed to the agent, the genotype of the animal has a profound effect on which sheep may become infected and eventually die. The interaction between the scrapie agent and host genetics is not fully understood.... The gene that encodes the normal prion protein has polymorphisms at codons 136, 154, and 171 that influence the ability of the prion cellular protein structure to be geometrically altered by the PrP scrapie template when the animal is exposed to it.... When only codons 171 and 136 are considered and H or K at 171 is treated as a Q at 171, there are only four combinations that need to be considered in order to eliminate scrapie from a flock: AARR, AAQR, AVQR, and QQ. AA RR sheep are nearly completely resistant to scrapie. ... AA QR sheep are rarely susceptible. In rare cases ... AV QR sheep are somewhat susceptible to some scrapie strains. ... QQ Sheep (AA QQ, AV QQ, and VV QQ) are susceptible to scrapie and can transmit the disease to susceptible flock mates.... (APHIS) is using genetic testing to determine which exposed animals must be removed or restricted in affected flocks and which are free to move unrestricted."</p>
357	U.S. Department of Agriculture Animal and Plant Health Inspection Service, "Scrapie Disease Information."	<p>Scrapie is a fatal, degenerative disease affecting the central nervous system of sheep and goats. It is among a number of diseases classified as transmissible spongiform encephalopathies (TSE).... Scrapie is the oldest known TSE, and under natural conditions only sheep and goats are known to be affected by scrapie. Once infected, the animal remains infected for life. Transmission of the classical scrapie agent is not completely understood, and apparently healthy sheep infected with the agent can transmit disease. ... The prolonged incubation period, the subclinical nature of the infection during its early stages, and the fact that the only diagnostic tests currently available require brain or lymphoid tissue make detection of scrapie difficult. ... Due to damage to the nervous system, affected animals often show behavior changes, such as nervousness or aggression, intense rubbing, and locomotor incoordination that progresses to recumbency and death. Other clinical signs may include tremors (especially of head and neck), head pressing or "star gazing," significant weight loss with no decrease in appetite, wool pulling, and hyperesthesia.... Once an infected animal is detected, eradication of the disease from the flock or herd may consist of either selective depopulation of certain higher-risk exposed animals (e.g., only those that are genetically susceptible, heavily exposed, test positive or inconclusive, and/or showing clinical signs) or, less commonly, complete flock depopulation, as well as cleaning and disinfection of the premises. Approximately 30 percent of US sheep are genetically susceptible to scrapie. Susceptibility varies between flocks based on breed and whether genetic selection for resistance has been used. Owners of infected flocks are encouraged to restock with rams that are resistant (RR) and ewes of resistant or less susceptible genotypes (RR or QR)."</p>

360	<p>Kurt Vercauteren et al., "Fence-Line Contact Between Wild and Farmed White-Tailed Deer in Michigan: Potential for Disease Transmission" [abstract only supplied]. (supplied by Laurie Seale)</p>	<p>Interactions between wild and farmed white-tailed deer (<i>Odocoileus virginianus</i>) along perimeter fences may play a role in the transmission of diseases like bovine tuberculosis and chronic wasting disease. However, no study has evaluated direct contact between wild and farmed deer through fences. We used animal-activated cameras to estimate rates of interaction between wild and farmed deer at 6 high-fenced commercial white-tailed deer farms in Michigan, USA, during October 2003 to January 2005. We recorded only 2 direct, naso-oral contacts between wild and farmed deer during >77,000 hours of camera monitoring. We documented little direct contact between wild and captive deer through fences and, therefore, believe there is limited potential for direct transmission of diseases. However, we suspect our results are conservative and do not rule out the risks of direct or indirect disease transmission into or out of deer farms. Our findings will be of use to federal and state agencies responsible for regulating deer farms as well as managers of such facilities.</p>
361	<p>R. A. Vosdingh et al., Experimental Bluetongue Disease in White-Tailed Deer (1968) (Rich Forrest)</p>	<p>Nine white-tailed deer and six sheep were experimentally exposed to the California BTV-8 strain of bluetongue virus. The infections were fatal for seven of the nine deer. An additional deer died from exposure to an isolate of bluetongue virus from bighorn sheep. Clinical signs and lesions of bluetongue in deer were described. The incubation period, signs and lesions of bluetongue and epizootic hemorrhagic disease of deer appear to be similar. Virus isolations were made from the blood and a variety of tissues of exposed deer and identified as bluetongue virus. Neutralizing antibodies were detected in all of the convalescent sera.</p>

367	Whitetails of Wisconsin, "CWD Best Management Practices" (Laurie Seale; Robert Welch)	<p>Enrollment in the CWD Herd Status Program is mandatory if you wish to move live farm-raised deer (FRD) within or outside of Wisconsin. You must be enrolled in the CWD Herd Status (HS) Program for at least 5 years before movement is allowed....To remain in the CWD HS program, you must... [p]erform CWD testing on FRD 12 months or older... [r]eport all escapes and returns to DATCP ... and to your local DNR warden within 24 hours....To add FRD to your enrolled herd, you must comply with applicable movement regulations for in-state movement; or imported deer. ...The herd must also be adequately separated from any wild deer herd known to be infected with chronic wasting disease. If 2 or more wild deer found or killed within 5 miles of the FRD herd have tested positive for chronic wasting disease, the herd must be enclosed by a double protective barrier.... Recommendations for reducing escapes: Check exterior fencing on a regular basis; check exterior fencing after a storm; [a]ny trees along the fence line that are deemed a risk such as dead trees, leaning towards the exterior fence, or trees with a weak root system such as Poplar, should be removed; [a]ll exterior gates should have secure latches or chains; [g]ate hinges should be securely attached and maintained with a recommended 3" in height to keep the gate from coming off the hinge; [l]oading and unloading areas must be secured. ... What to do if an escape does occur ...If the herd resides in a non-CWD affected area, the herd owner has 120 hours to return the escaped animal to the herd without the loss of herd status. If a FRD escapes into a wild disease control area, the herd owner only has 24 hours to return that animal to the herd without the loss of herd status. Escaped deer are very easy to get back into their pens; it is the only home they know and they are dependent on their food source. The majority of the time they will wonder around for a short time, but will be back trying to get back in with their pen mates....It is highly important to have a pen or alleyway that can be opened up for them to return to. The majority of the time they will be back into the enclosure within 6 hours looking for their food source and their pen mates."</p>
369	Wisconsin DATCP, Division of Animal Health, [maps showing location of registered deer farms and of CWD positive locations of wild deer] (supplied by Laurie Seale)	
371	Wisconsin DNR, "Post-hunt deer population estimates for counties/new management areas, 2002-2017" (supplied by Laurie Seale)	