

Wildlife Bureau PO Box 200701 Helena MT 59620-0701 February 20, 2013

Dear Interested Person:

Montana Fish, Wildlife & Parks is requesting public comment on proposed a proposed suspension of specific elements of the Chronic Wasting Disease (CWD) Plan. Additional information is below including the deadline for public comment.

Suspension of CWD Plan Elements – Proposed

The decision notice and environmental assessment for FWP's "Chronic Wasting Disease Management Plan for Free Ranging Wildlife in Montana" were completed in 2005. The plan sought to outline FWP responses to CWD detection in free-ranging wildlife, particularly deer and elk, by depopulating the local herd when various techniques showed that at least 5 percent of a herd contracted the disease. CWD, then, would be eradicated by removing the host species, typically deer, within some area containing infected individuals.

Similar actions were largely identified in other state wildlife agency plans that also tried to address the issue of CWD in deer. The typical prescription included eradication in specific areas. Subsequent results, however, especially in Wisconsin, showed that eradication efforts failed. Eradication efforts didn't result in a decline in: (1) disease prevalence or (2) the abundance of animals in the infected herd. In addition, those efforts were typically unpopular with the public.

Today, there isn't a clear prescription for managing CWD. Current state plans lean heavily on an "adaptive management approach," which depends on research to guide future decisions. Specific prescriptions to depopulate infected herds have largely been abandoned.

This proposal is to temporarily suspend some management and surveillance portions of Montana's approved CWD plan until a new plan is approved. In light of new information and research, FWP's wildlife health staff is currently developing new alternatives for the management portion of the plan. In addition, FWP is developing plans for reduced surveillance efforts commensurate with current funding levels. These efforts will lead to development of new alternatives that will ultimately be submitted to the FWP Commission for approval. For further clarification, please read the attached document: Proposed – Adjusted Decision Notice: Chronic Wasting Disease Management Plan for Free Ranging Wildlife in Montana or call the Wildlife Bureau office at 406-444-2612 or visit the www.fwp.mt.gov website.

COMMENT PERIOD DEADLINES AND FINAL ADOPTION MEETINGS

The public comment period on this proposal will extend through 5 p.m., Monday, March 25, 2013. Final adoption on this item will be made at the April 11, 2013 FWP Commission meeting.

TO MAKE COMMENT

For further clarification, you may call the Wildlife Bureau office at 406-444-2612. To submit comments electronically, this letter with the imbedded links below can be found under "Opportunity for Public Comment" on the Hunting home page at the fwp.mt.gov website. Written comments can be sent to: FWP – Wildlife Bureau, Attn: Public Comment, POB 200701, Helena MT 59620-0701.

Imbedded Links to Submit Public Comment

Suspension of CWD Plan Elements – Proposed

The deadline for public comment on this item is 5:00 PM Monday, March 25, 2013. http://fwp.mt.gov/hunting/publicComments/suspensionOfCwdPlan.html

ADJUSTED DECISION NOTICE: CHRONIC WASTING DISEASE MANAGEMENT PLAN FOR FREE RANGING WILDLIFE IN MONTANA

Background

This document details temporary changes to the original decision notice (DN) prepared with the environmental assessment (EA) "Chronic Wasting Disease Management Plan for Free Ranging Wildlife in Montana". The EA and DN were completed in 2005 and intended to serve as a management plan that would outline the FWP responses to CWD detection in free-ranging wildlife (cervids) in Montana.

The primary theme of the Management plan was to take measures to eliminate CWD, by depopulating the local herd, once the disease is detected at a prevalence of 5% or more in free ranging wildlife. During that era, plans from other states included similar goals. CWD would be eradicated by eradication of the host species, typically deer, within some area containing infected individuals, determined with disease testing and herd movements data from radio-collared animals.

The experiences from Wisconsin imply that CWD eradication is challenging and largely infeasible. CWD was first detected in free-ranging white-tailed deer in Wisconsin in 2002. The state's plan included objectives to prevent the spread of CWD and eradicate the disease in the affected areas, by depopulating the infected herds. Hunting regulations were liberalized and included unique hunter incentives in CWD infected areas with the objective of dramatically reducing deer abundance. The plan also included landowner kill permits and agency removal efforts. However, following 8 years of intensive management, deer abundance in the affected areas was only somewhat reduced, and the known distribution of CWD was substantially larger and increasing. Generally, there was a lack of support from hunters that evolved into widespread, vehement opposition to the eradication plan. Wisconsin abandoned the eradication objective.

There is not a clear prescription for managing CWD. Current state plans tend to lean heavily on an "adaptive management approach", using management data and research findings to guide future decisions and management. The specific prescriptions to depopulate infected herds have largely been abandoned.

The purpose of this proposal is to temporarily suspend portions of the Management and Surveillance plans of the Montana CWD Management Plan. Lessons learned from the experiences of other state agencies demonstrate that eradication is not feasible or effective at reducing the spread of CWD and that such efforts are not acceptable to stakeholders. In light of new information and research findings, FWP wildlife health staff are currently developing new alternatives for the Management portion of the plan. In addition, staff are developing plans for reduced surveillance efforts commensurate with current funding levels. These efforts will lead to development of new alternatives that will ultimately be submitted to the FWP commission for approval. This proposal would suspend the portions of the Management and Surveillance plans, until the new plan is approved.

Adopting this proposal would suspend key portions of Management portion of the plan until the new plan is adopted. This would be a concern if CWD were detected during that interim period. However, recognize that staff are currently working diligently to identify and define suitable alternatives. If CWD is detected during this interim period, the FWP epidemiological team will rapidly develop appropriate response alternatives that would be presented to the Commission. That process would not significantly delay action.

Proposal

The 2005 DN identified plans for Prevention, Surveillance, Management, Public Information, and Research. The plans for Prevention, Public Information, and Research will remain unchanged. FWP proposes to suspend portions of both the Surveillance and Management plans detailed below.

Surveillance

The FWP preferred alternative recommended that the collection of hunter killed samples for CWD surveillance continue with a focus on identified "high risk" areas, and that a program be initiated to increase the statewide collection of road-killed samples. This approach was developed when FWP was receiving funding through the national surveillance program. For example, during 2005, Montana received approximately \$90,000 from USDA/APHIS for CWD surveillance. That funding is no longer available and the existing surveillance budget is limited to \$9,000 in FWP operating funds. During 2012-13, the monitoring effort is limited to collection of symptomatic deer and elk. Sample collection from road kills and at check stations has been suspended.

FWP proposes to suspend elements of the Surveillance program, except to retain testing of symptomatic deer and elk.

Management

The 2005 DN selected 2 management alternatives, IV and V. The DN specified that the appropriate alternative (IV or V) would be implemented depending on the circumstances. Both alternatives specify methods to identify the management area containing the population and subsequent monitoring to measure prevalence. Once prevalence exceeded 5%, both alternatives include a 50% population reduction in the management area. The population reduction would be intended to eliminate CWD positive animals and prevent more widespread distribution of CWD in Montana.

Eradication might remain appropriate in Montana, but at this time, FWP feels it is appropriate to temporarily suspend the "population reduction" portion of the Management section of the plan.

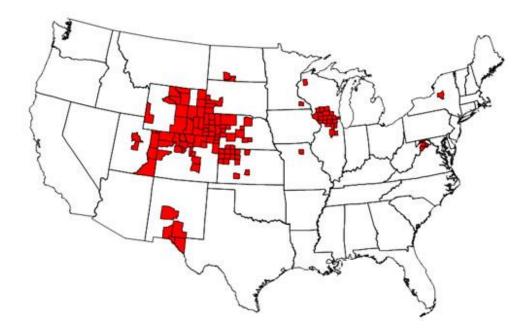


Figure 1. Location, by county, of known CWD presence in free ranging cervids in the United States.