



June 28, 2019

Wyoming Game and Fish Department
Chronic Wasting Disease Working Group

To the Wyoming Chronic Wasting Disease Working Group:

Please accept these recommendations from Sierra Club Wyoming Chapter, Wyoming Wildlife Advocates, and Western Watersheds Project to help inform your deliberations for a new Chronic Wasting Disease (CWD) Management Plan. Our members, supporters, boards, and staff in Wyoming and throughout the United States value and appreciate the wildlife in Wyoming, including deer, elk, moose, their habitats, and the carnivores and scavengers that attend these cervids. For many years we have studied the literature about CWD and are familiar with not only the progress of the disease in North America over decades, but also with the recommendations of leading scientists about how to mitigate the impacts of CWD over time.

As you know, consumptive and non-consumptive uses of wildlife are significant drivers of Wyoming's economy, accounting for close to a billion dollars in income every year (Wyoming Game and Fish Department, 2019). Our members and supporters throughout Wyoming include hunters and other wildlife enthusiasts who believe that both prey and predator wildlife species should be managed so that natural processes can be maintained to ensure healthy, free-ranging wildlife populations are in balance with high quality habitat.

Scientists have studied this disease for many decades, and we encourage you to avail yourselves of the abundance of contemporary science describing CWD and its effects on wildlife. While this disease and its ramifications are complex, it is not out of reach of available 21st century tools to mitigate prevalence and impacts. It will take a comprehensive, multi-faceted program over decades to mitigate CWD not just a simple singular approach. Fortunately, there are several tools and methods that can be used right away. We encourage you to recognize and include them all in your deliberations and report.

We applaud you for your efforts to achieve a CWD Management Plan that matches the world-renowned wildlife of Wyoming. We cannot solve this problem by continuing the thinking and practices that caused it, so to effectively mitigate the effects of CWD on Wyoming's wildlife, recommendations for a CWD Management Plan should include the following at a minimum:

1. A goal to limit the prevalence of CWD in any wild cervid herd to less than 5%. (Colorado CWD Response Plan 2018, pp.19-20).
2. A statewide law is needed in Wyoming banning the artificial baiting and feeding of elk, deer or moose. Montana has one (Montana CWD Management Plan 2018, p.8) as does Colorado (Colorado CWD Response Plan 2018, p.37).
3. Artificial feeding of elk at the National Elk Refuge and Wyoming's 22 state elk feedgrounds must be phased out expeditiously to protect those populations from the ravages of CWD and other diseases and to further limit the spread of disease from the feedgrounds to other areas of the Greater Yellowstone Ecosystem (Peterson, 2004; Smith, 2012; Wilkinson, 2017a).
4. Conserve abundant populations of large wild carnivores statewide to cull diseased elk and deer and help keep populations healthy and in balance with available habitat (Hobbs, 2006; Krumm, et al. 2010; Wild, et al., 2011; Wilkinson, 2017).
5. Salt blocks for livestock should be made unavailable to wildlife in CWD zones to decrease the risk of infectious prion transmission among wild deer, elk, and moose (Outbreak News Today online, 2018; Henderson, 2013; Plummer, 2018).
6. A comprehensive archive of all relevant CWD information, studies, and recommendations should be cooperatively managed by WGFD, University of Wyoming, and the Prion Research Center of Colorado State University, and made available to the public.
7. Safe disposal methods for CWD-infected and suspected carcasses must be reasonably available to all Wyoming communities. Guidance on this issue may be obtained from Montana's CWD Plan:

Environmental contamination through dispersal of heads and spinal columns from butcher waste has the potential to introduce or spread CWD in wild populations. The U.S. Environmental Protection Agency (EPA), the State of Wisconsin, and the U.S. Department of Agriculture have identified appropriate carcass disposal methods to include burying waste in municipal solid waste landfills (MSWLFs), incineration, alkaline hydrolysis tissue digestion, or on-site burial. The EPA currently recommends using MSWLFs for the large-scale disposal of potentially CWD-contaminated carcasses and wastes. Carcass waste of animals harvested from areas in Montana where CWD has been detected should be disposed in an approved (40 CFR Part 258) MSWLFs (Montana, 2018).

Wyoming should strive to make MSWLFs or incinerators available to all residents for the disposal of ungulate carcasses. The state of Wyoming should also make every effort possible to educate hunters, meat processors, and any other party that handles carcasses on proper waste disposal techniques to minimize the spread of CWD.

8. Include a discussion about the threat that prion diseases, including CWD, pose to human health and note the example of Bovine Spongiform Encephalopathy (aka, Mad Cow Disease) causing human deaths. Consult with public health officials to discuss current research on CWD prion transmission to people and what precautions should be taken by individuals and local governments to reduce disease transmission risks (Waddel et al., 2018). Educational efforts should include the recommendations for prevention of disease transmission to people from the Centers for Disease Control and Prevention (2018).

“Science can flourish only in an atmosphere of free speech.” Albert Einstein

The Wyoming Game and Fish Department has recently said that the CWD Working Group should not consider elk feedgrounds in their deliberations for a new CWD Management Plan. Allegedly, they want that topic saved for another day, or year. However experts have counseled that as CWD inevitably affects the 22,000 elk kept on disease-ridden feedgrounds in western Wyoming for months each winter it would imperil those herds and the ecology of the entire Greater Yellowstone Ecosystem over time. All residents and visitors to western Wyoming have a stake in those thousands of elk, and the threat of CWD is real.

Wildlife-based tourism is a huge portion of the \$3.8 billion dollar travel and tourism industry in Wyoming. How Wyoming deals with this threat to *our* wildlife will also impact the adjacent states of Montana and Idaho, their wildlife, and their economies. We can't afford, nor can our neighbors afford, to waste this opportunity to have an honest, open discussion that includes all the relevant high quality information to arrive at comprehensive, short- and long-term solutions. The deliberations of the CWD Working Group should not be handcuffed before they even get started. The likely impacts of CWD on elk feedgrounds and our need to evolve into a healthier paradigm for elk management in western Wyoming should be part of this committee's agenda. Wyoming and our wildlife deserve nothing less.

Thank you for your consideration of these comments. We look forward to discussing this further with you and observing your progress on this important topic.

Sincerely,

Lloyd Dorsey
Conservation Program Manager
Sierra Club Wyoming Chapter
P.O. Box 12047
Jackson, WY 83002
307-690-1967
Lloyd.dorsey@sierraclub.org

Kristin Combs
Executive Director
Wyoming Wildlife Advocates
PO Box 1772, Wilson WY 83014
307-413-4116
kristin@wyowild.org

Jonathan Ratner, Director
Western Watersheds Project – Wyoming Office
PO Box 1160
Pinedale, WY 82941
307-231-1325
Jonathan@WesternWatersheds.org

References cited:

Centers for Disease Control and Prevention. 2018. Prevention. Retrieved from <https://www.cdc.gov/prions/cwd/prevention.html>

Colorado, 2018. Colorado Chronic Wasting Disease Response Plan, December 2018. Colorado Parks and Wildlife.

Henderson, D.M. 2013. Rapid Antemortem Detection of CWD Prions in Deer Saliva. PLOS/One September 2013.

Hobbs, N. Thompson. 2006. A Model Analysis of Effects of Wolf Predation on Prevalence of Chronic Wasting Disease in Elk Populations of Rocky Mountain National Park.

Krumm, C.E., M.M. Conner, N.T. Hobbs, D.O. Hunter, and M.W. Miller. 2010. Mountain lions prey selectively on prion-infected mule deer. Biol. Lett. 6, 209–211. doi:10.1098/rsbl.2009.0742.

Montana, 2018. Montana CWD Management, April 19, 2018. Montana Fish Wildlife and Parks, Montana Department of Livestock, and Montana Department of Public Health and Human Services.

Outbreak News Today, 2018. Chronic wasting disease prions found in soil and water in Wisconsin: Study. <http://outbreaknewstoday.com/chronic-wasting-disease-prions-found-soil-water-wisconsin-study-68515/>

Peterson, M. J. 2005. Chronic wasting disease and the Greater Yellowstone Area. Final report, Greater Yellowstone Coalition, Bozeman, Montana, USA.

Plummer, I.H. 2018. Mineral licks as environmental reservoirs of chronic wasting disease prions. University of Wisconsin Research Article.

Smith, B.L. 2012. *Where Elk Roam: Conservation and biopolitics of our national elk herd*. Guilford, CT. Lyons Press.

Waddell, L, Greig, J, Mascarenhas, M, Otten, A, Corrin, T, Hierlihy, K. 2018. Current evidence on the transmissibility of chronic wasting disease prions to humans-A systematic review. *Transbound Emerg Dis.*, 65(1):37-49. doi: 10.1111/tbed.12612.

Wild, M.A., N.T. Hobbs, M.S. Graham, and M.W. Miller. 2011. "The role of predation in disease control: A comparison of selective and non-selective removal of prion diseases in deer." *Journal of Wildlife Diseases* 47(1):78-93.

Wilkinson, T. 2017. The Undeniable Value of Wolves, Bears, Lions and Coyotes in Battling Disease. <https://mountainjournal.org/predators-and-chronic-wasting-disease>

Wilkinson, T. 2017a. America's National Elk Refuge: A 'Miasmatic Zone of Life-Threatening Disease'. <https://mountainjournal.org/the-killing-of-our-national-elk-herd>

Wyoming Game and Fish Department. 2019. Increase in wildlife-based recreation contributes more to Wyoming economy in 2017. Retrieved from <https://wgfd.wyo.gov/News/Increase-in-wildlife-based-recreation-contributes>