



P.O. BOX 82395, OKLAHOMA CITY, OKLAHOMA 73148 • TELEPHONE 405/235-4391 OR 235-3607, FAX 405/235-3608

February 16, 2016

Bennett Abbott
2800 North Lincoln Boulevard
P.O. Box 528804
Oklahoma City, Oklahoma 73152-8804

Dear Mr. Abbott,

On behalf of the members of the Oklahoma Cattlemen's Association (OCA), I appreciate the opportunity to submit comments relative to the proposed rule changes for Subchapter 34. Feral Swine. OCA members have a keen interest in this very important issue and appreciate the Oklahoma Department of Agriculture, Food and Forestry (ODAFF) issuing the proposed rules.

At our 2015 Annual Convention, OCA members discussed this issue and passed policy which includes:

- OCA supports efforts to control and reduce the feral swine population
- OCA opposes policies that would limit or hinder the ability of private land owners to control the feral swine on their property
- OCA supports policy for translocated feral swine that includes: reasonable identification that recognizes handler and animal safety and effectiveness of identification device; and recognition of existing and future business models that aide in control of the feral swine population.

After reviewing the proposed rule modifications, OCA believes that there are many facets that match our policy. We appreciate the forthright nature of the proposed rule as ODAFF is acting to "adopt aggressive measures for the eradication of all feral swine in the State of Oklahoma." Feral swine have become a major invasive species causing, perhaps unmeasurable damage to Oklahoma cattle producers. They destroy hay meadows, pastures, improved grazing operations as well as stream beds and waterways. We especially appreciate ODAFF's commitment to "investigate and implement new population control methods, technologies, and toxicants as they become available". Many new technologies and techniques are becoming available and should be explored to understand their application in both broad and individual scales.

There is little doubt that the illegal translocation of feral swine has contributed to the increasing problem of this invasive species. OCA supports the prohibition of importing live feral swine, except for direct to slaughter, outlined in Section 35:15-34-3 and encourages vigorous enforcement of this rule. Further, the requirements to obtain a transporter license and a 24 hour permit issued by ODAFF before feral swine can be transported seem reasonable. As outline above, OCA policy supports identification of translocated swine and would encourage ODAFF and those involved in transporting feral swine to discover and implement a safe way to do so.

Get This Sign UP
Keep Theft Losses DOWN!

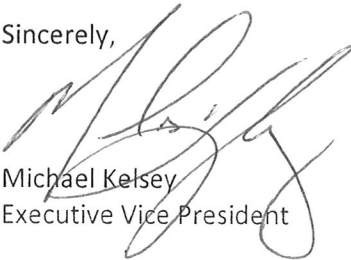


Section 35:15-34-6 contains provisions related to sporting facilities. OCA finds the modifications outlining reporting of feral swine released and killed in the facility to be reasonable and necessary in order to understand how these facilities may or may not play a role in the control of feral swine. Again, OCA policy supports identification of all translocated feral swine.

Finally, the Feral Swine Free Zone as outlined in Section 35:15-34-19 is a bold forward step to begin an eradication process. Appropriate surveillance and vigilant enforcement will be necessary for a 'free zone' to have opportunity to contribute to this overall goal. Subsection (d) does need to be clearer regarding a landowner's requirement to report any "sighting, capture or kill to the Department". Who specifically should the landowner report? There should be no effort by the Department to interfere with landowners who desire to control feral swine on their property by any reasonable method available. It is OCA's understanding that the reason for the reporting requirement is to allow ODAFF the knowledge of the location of swine in the free zone. While this is understandable, careful attention to respecting land owner private property rights should be exercised by ODAFF regarding where feral hogs may be in free zones. Before anyone enters private property, proper permission from the land owner should be received.

Again, thank you for the opportunity to provide comments on this important rule.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Kelsey', is written over the typed name and title.

Michael Kelsey
Executive Vice President