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Wildlife Conservation Commission
Rick Holder **James V. Barwick**
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Vice Chairman **Jess Kane**
Mark Mabrey **John P. Zelbst**
Secretary

OKLAHOMA WILDLIFE CONSERVATION COMMISSION POSITION STATEMENT

House Bill 3270 Release of Captive, Pen-Raised Deer into Oklahoma's Wild Deer Population

The Oklahoma Wildlife Conservation Commission ("Commission") issues the following Position Statement regarding its concerns regarding House Bill 3270, legislation that would authorize the release of pen-raised, commercially bred and genetically enhanced deer into Oklahoma's wild deer population ("HB 3270") and transfer key wildlife management decisions from the Oklahoma Department of Wildlife Conservation to the Oklahoma Department of Agriculture, Food and Forestry. In an effort to inform the Oklahoma Legislature and Governor of the potential biological, economic, and regulatory consequences of HB 3270, a motion was made, duly seconded, and approved by the members present for the Commission to adopt and issue the following Position Statement:

The Commission is constitutionally and statutorily charged with the management, conservation, and regulation of Oklahoma's deer and all wildlife resources for the benefit of all Oklahomans. Wildlife in Oklahoma is held in public trust, and for more than a century, the stewardship of wild deer has rested solely with this Commission and the Oklahoma Department of Wildlife Conservation ("Department"), guided by professional wildlife science, public input and the North American Model of Wildlife Conservation.

HB 3270 would authorize a practice that has never been implemented in Oklahoma and has not been adopted by any state wildlife agency as a management tool: the release of captive, commercially bred deer that have been genetically enhanced to be allegedly resistant to chronic wasting disease (CWD) into a free-ranging wild herd with regulation by the state department of agriculture. The Commission finds that such an action warrants comprehensive scientific review and careful consideration of all potential unintended consequences before any implementation, a process that was initiated with HB3462 in 2024.

Oklahoma is widely recognized as a top-five deer hunting destination in the United States, including a record harvest of 134,158 deer during the 2022/23 season. The quality of its wild deer herd support land values, hunting lease markets, and rural economies. The

Commission is proud of the work done by the Oklahoma Department of Wildlife Conservation in building Oklahoma's national reputation as a prime destination for free-ranging trophy-quality deer. Introduction of captive deer into the wild herd is an experiment that jeopardizes this standing and could result in unintended biological and regulatory consequences, including the potential disqualification of Oklahoma deer from the Boone and Crockett and Pope and Young record books. Such an outcome would diminish the value of Oklahoma's deer resource and negatively affect landowners, hunters, and rural communities. Deer hunting contributes significant economic activity to Oklahoma's economy, and any action that undermines herd integrity could have substantial statewide economic consequences.

There is ongoing scientific research that involves predictive genetics and further understanding of Chronic Wasting Disease (CWD)-resistant deer. Available research indicates that deer identified as genetically favorable have nonetheless succumbed to the disease. While CWD has been detected in Oklahoma, it has not resulted in documented population-level declines nor measurably reduced deer hunting opportunity. The Commission does not find that current conditions constitute a crisis requiring legislative intervention that fundamentally alters wildlife management policy.

The release of captive deer into the wild could also present unknown and potentially irreversible risks, including the introduction of novel diseases, increased susceptibility to Epizootic Hemorrhagic Disease (EHD) and Blue Tongue, genetic weaknesses, disruption of established herd dynamics, and localized population increases that could exacerbate agricultural depredation or vehicle collisions. Deer do not recognize state boundaries, and such actions could expose Oklahoma to disputes or legal challenges from neighboring states committed to maintaining strictly wild, free-ranging herds.

The North American Model of Wildlife Conservation holds that wildlife shall not be commercialized and shall be managed by trained professionals in the public trust. HB 3270 represents a shift toward monetization of wildlife resources and risks placing private commercial interests over public trust management.

The Commission further affirms its full commitment to the original intent of the 2024 legislation HB3462 which called for a comprehensive review of the available science and a thorough examination of potential unintended consequences before any policy decisions are made. At the Legislature's direction, the Commission committed to a process and not a predetermined outcome. The Commission has consistently stated its intention to follow the best available science and HB3270 circumvents that science.

In fulfillment of that commitment, the Department pledged to collect 1,000 DNA samples from Oklahoma's native deer herd for genetic analysis. To date, approximately 550 samples have been collected, analyzed, and returned with results, and the Department will

soon be sending the remaining samples to complete this objective. This work is intended to ensure that any future policy considerations are grounded in Oklahoma-specific scientific data.

The Department has also engaged stakeholders, including local, regional and national sportsmen’s organizations, and remains ready and willing to work collaboratively with the Oklahoma Department of Agriculture, Food, and Forestry (ODAFF) and other partners to ensure any decisions affecting Oklahoma’s deer herd are informed, transparent, and science-based. Additionally, the Commission is committed to public forums, surveys and other venues to gather public input regarding deer management in the state for the benefit of all Oklahomans.

The Commission respectfully maintains that the management of Oklahoma’s wild deer herd should remain under the authority and expertise of the Commission and the Wildlife Department.

Therefore, in the best interest of the people of Oklahoma, the Commission respectfully recommends that House Bill 3270 not be enacted in its current form.

Done this 2nd day of March 2026.

OKLAHOMA WILDLIFE CONSERVATION COMMISSION

By: 
Chair, Rick Holder

Attest: 
Secretary, Mark Mabrey

WILDLIFE COMMISSIONERS

- Jess M. Kane, District 1
- Mark Mabrey, District 2
- Timothy Diehl, District 3
- Eric Chapman, District 4
- James V. Barwick, District 5
- John P. Zelbst, District 6
- Rick Holder, District 7
- D. Chad Dillingham, District 8