

January 29, 2013

House Agriculture Committee  
Montana House of Representatives  
Helena, Montana

Dear members,

After reading HB 312, I wish to offer the following comments.

By way of introduction, I spent 30 years as a wildlife scientist and manager, most of those with the U.S. Fish and Wildlife Service, and the final 22 years as the wildlife biologist at the National Elk Refuge in Jackson, Wyoming. In that capacity, I did research on elk population biology and ecology, but more importantly in regard to HB 312, I coordinated the refuge's winter feeding program and was responsible for monitoring disease among the elk, including brucellosis. In that capacity I worked with a host of federal and state agency personnel and private groups to mitigate diseases among the elk and their potential for transmission to livestock.

Although I understand that HB 312's broad intent is to provide the means of authorizing agency responsibilities for testing and prevalence reduction of brucellosis in livestock and wildlife, I find some of the proposed bill's language so general and vague as to be subject to individual interpretation.

Specifically, Section 1 (2) parts a and b include, in part, the language "eliminated or minimized as much as possible," and "prevalence reduction procedures" regarding brucellosis in bison and other species of wildlife (which I assume to mean elk).

While I appreciate Montana state government's interest and efforts to limit the effects of brucellosis on the livestock industry and individual producers, therapeutic tools for accomplishing what Section 1(2) parts a and b reference were largely developed for monitoring/managing/eliminating brucellosis in cattle. Cattle testing procedures are less useful and certainly less practically applied in free-ranging wildlife. Capturing or confining and testing wildlife is expensive, stressful to wildlife, and potentially contrary to principles of managing wildlife as free-ranging public resources. More importantly, the wording I referenced, because of its vague nature, could be interpreted to empower agency administrators to establish and implement management guidelines that could negatively impact wildlife herds.

Tools for reducing prevalence of brucellosis, and for that matter other diseases in free-ranging wildlife, are limited compared to those for remedying the disease among infected herds of cattle: tools such as prophylactic vaccinations, culling, test and slaughter, or whole herd depopulation.

My experience in Wyoming shows that available vaccines (S19 and RB51) are so marginally efficacious in protecting elk against field strain brucellosis infection and preventing brucellosis-induced abortions that they are not a viable management tool. Wyoming's experimental test and slaughter program—implemented to greatly reduce or eliminate brucellosis in feedground elk—was abandoned after 5 years due to its tremendous budgetary costs and failure to achieve the program's goal. The most cost-effective means of limiting exposure and infection of susceptible cattle herds to brucellosis from potentially infected bison or elk are to calfhood vaccinate cattle herds and proactively implement practices that limit species sympatry and comingling during periods when transmission is most likely to occur.

To this point, the stated language I referenced in this proposed legislation could conceivably commit Montana to the slippery slope of imposing livestock husbandry practices on the public's free-ranging wildlife. I suspect that is not the intention of HB312, so I suggest reconsidering the bill or redrafting it with language that's far more specific and more limited in scope regarding "reducing" and "eliminating" disease in wildlife, and more appropriately focuses on how the interests of the livestock industry can be protected through management procedures that have been demonstrated to be successful and are cost effective.

Sincerely,

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