



**MONTANA
FARM BUREAU
FEDERATION**

502 S. 19th Ave. Ste 104
Bozeman, MT 59718

ENVIRONMENTAL QUALITY
COUNCIL. 2015-16

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May 5, 2016

Exhibit 16

February 10, 2016

National Park Service
PO Box 168
Yellowstone National Park, WY 82190

Re: Bison Quarantine EA

On behalf of the Montana Farm Bureau Federation (MFBF) and our farming and ranching membership I would like to submit comments on the proposed alternative of establishing a quarantine program for Yellowstone bison within the Fort Peck Reservation. With a membership of over 20,000, MFBF is the state's largest agriculture organization and we work to represent our members on a variety of topics concerning the agriculture industry in Montana. As an industry organization, we do have concerns regarding the implementation and subsequent consequences of this plan. Our concerns can be outlined by the following topics; Quarantine Criteria, Population Management, and Affects to the Agriculture Industry.

Quarantine Criteria

The Environmental Assessment (EA) suggests that bison testing negative for brucellosis exposure would be shipped outside of the Designated Surveillance Area (DSA) to a quarantine facility on tribal lands. Research indicates that high percentages of initial seronegative bison seroconvert in subsequent tests; a 2014 study of the feasibility of quarantine procedures indicates that 85% of bison initially testing negative for brucellosis exposure seroconvert within 120 days (Clarke et al. 2014).

Based on this research, an initial negative test is not valid representation of that animal's disease status. The report goes on to indicate it takes months of additional testing to ensure bison and their progeny can, in fact, be certified brucellosis free. Additionally, Alternative three proposes nonselective capture and relocation of bison to the reservation. This allows seropositive, pregnant females to move across the state to a quarantine facility and is an unnecessary risk to the viability of the cattle industry in Montana.

At least twice in the EA, once on page 33 and again on page 35 references are made to the establishment of both an "emergency response plan" and a "foreign animal disease emergency preparedness plan". Without proper documentation of either of these plans anywhere within the EA, we cannot assume the plans are thorough or meet current

USDA APHIS best management practices for such emergencies. Without explanation or citation, these statements should be removed from the EA.

Population Management

Our primary concern regarding population management is the availability of current population control methods and quarantine facilities that are not utilized. It is unnecessary to establish an additional quarantine facility outside the DSA when NPS has access to facilities within close proximity to YNP. The EA references previous quarantine research conducted at Corwin Springs and goes on to state that YNP does not currently have an active quarantine program.

MFBF firmly believes the first logical step is to reinstate the quarantine program at Corwin Springs and keep the bison within the DSA.

There is strong demand for more bison hunting opportunities among tribal entities and the general public. Again, MFBF believes YNP has not made sufficient attempts to provide more public hunting opportunities. This is an additional management tool that is not being utilized to its full potential.

Until public hunting opportunities have been increased and the quarantine facility at Corwin Springs nears capacity, NPS should not seek additional quarantine facilities anywhere in Montana.

Affects to the Agriculture Industry

We question whether the quarantine facility at Ft. Peck will result in additional regulation and requirements on cattle leaving the state of Montana. The entire premise behind establishing the DSA was to preserve the integrity of Montana's cattle market and mitigate the exposure of domestic cattle to brucellosis. Moving bison outside the DSA to complete quarantine undermines the system we've spent many years and millions of dollars establishing.

An additional quarantine facility outside the DSA will only reaffirm skepticism among other states in our ability to effectively manage brucellosis in Montana. The potential for increased risk to brucellosis exposure is all the prompting many animal health officials in other states need to implement stringent requirements against cattle leaving Montana. Again, this is an additional, unnecessary risk for the cattle industry in Montana with no assurances or recourses outlined in any alternative within the EA.

Page 35 of the EA states; "any damage to crops, fencing, or property caused by buffalo that have escaped from their range units would be addressed by the tribes". There is no additional documentation supporting this statement. If bison escape a range unit onto private property the potential for costly and devastating damage to occur exists. As further assurance and accountability there needs to be a detailed, written contingency plan available for review. This plan should include industry acceptable best management practices for responding to instances of bison escaping their range units.

MFBF supports the rights and desires of Fort Peck Reservation acquiring bison. We do not support any entity outside of the DSA acquiring bison that have not completed quarantine and are not certified brucellosis free.

In summary, MFBF does not support Alternative 3. We believe NPS has available options within the DSA which allows them to achieve the same management objectives outlined in the EA. Establishing an additional quarantine facility outside the DSA is unnecessarily risky and poses serious threats to the livestock industry and private property owners of Montana.

Thank you for your consideration of our comments. We appreciate the opportunity.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert Hanson".

Robert Hanson
President, MFBF

References

- Rhyan, J.C., K. Aune, T. Roffe, D. Ewalt, S. Hennager, T. Gidlewski, S. Olsen, and R. Clarke. 2009. Pathogenesis and epidemiology of brucellosis in Yellowstone Bison: Serologic and culture results from adult females and their progeny. *Journal of Wildlife Diseases* 45: 729-739.