



United States Department of the Interior

National Park Service
P.O. Box 168
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**LEGISLATIVE ENVIRONMENTAL
POLICY OFFICE**

MAY 27 2016

Mr. Joe Kolman, Legislative Analyst
Environmental Quality Council
Legislative Environmental Policy Office
State Capitol Building
1301 East 6th Avenue, Room 171
P.O. Box 201704
Helena, Montana 59620-1704

Dear Mr. Kolman:

I appreciated the opportunity to speak with the Council on May 5, 2016, regarding the potential implementation of a quarantine program with Yellowstone bison at the Fort Peck Reservation. Unfortunately, several presenters at this meeting made inaccurate or misleading statements that need clarification and are addressed in this letter.

For example, a representative of the Montana Stockgrower's Association indicated the quarantine protocol only required two tests for bison to complete quarantine and be released elsewhere, which is incorrect. The testing protocol included in the Environmental Assessment (page 25) released by the National Park Service for the quarantine program was taken from Animal and Plant Health Inspection Service's (APHIS) *Brucellosis Eradication Uniform Methods and Rules* (2003) for livestock, including domestic bison, and includes three to five tests over a period of one to two and one-half years. However, we are testing bison more frequently during the first several months because previous work has demonstrated that any bison infected with brucellosis bacteria will be detected within the first seven months of the testing protocol. A similar protocol was used by the State of Montana and APHIS in the quarantine feasibility study with Yellowstone bison during 2005 to 2010, which demonstrated that bison repeatedly testing negative for brucellosis exposure through pregnancy and calving could be considered brucellosis-free. These bison were subsequently released on the Fort Peck Reservation.

In addition, a representative of the Montana Department of Livestock suggested the Environmental Assessment allowed bison to be sent anywhere within or outside the Designated Surveillance Area for quarantine. In reality, two specific sites for quarantine have been proposed: the Stephens Creek facility in Yellowstone National Park and the quarantine facility on the Fort Peck Reservation. The Environmental Assessment indicates additional NEPA/MEPA would need to be completed before quarantine could be conducted at other sites.

Also, if the Assiniboine and Sioux tribes at Fort Peck propose to relocate bison completing quarantine to other non-tribal lands in Montana in the future, they would need to coordinate with the State regarding compliance with applicable laws. The State of Montana already has a Memorandum of Understanding with the Fort Peck tribes to potentially acquire bison from them in the future to establish one or more wild bison herds on public lands.

A representative of the Montana Board of Livestock indicated they were unaware of the proposed quarantine program until quite recently. To the contrary, State and tribal representatives have been proposing and considering quarantine for Yellowstone bison as far back as 1995, including in facilities “on the lands of a cooperating tribe or other organization.” In 2011, members of the Interagency Bison Management Plan began discussing options for a quarantine program to reduce the number of bison being shipped directly to slaughter. Staff from the National Park Service worked with the Montana State Veterinarian, APHIS, and the InterTribal Buffalo Council on the roles and responsibilities for quarantine facilities and brucellosis testing, which were included in the Environmental Assessment. In 2013, the Fort Peck Tribes informed the Interagency Bison Management Plan managers that they were building a new handling facility that would meet the requirements of the APHIS quarantine protocol. In November 2014, the National Park Service briefed the Executive Director of the Montana Board of Livestock, State Veterinarian, and others at a meeting of the Interagency Bison Management Plan on public comments received during scoping for a potential quarantine program, while representatives of the InterTribal Buffalo Council and the Fort Peck Tribes again discussed their desire and plans for a quarantine program. Progress on the quarantine planning process has been updated thereafter at three meetings each year of the Interagency Bison Management Plan, as documented in the annual reports and meeting minutes posted on the ibmp.info website.

A representative of APHIS indicated conducting quarantine on the Fort Peck Reservation would greatly increase the risk of brucellosis transmission from bison to cattle. This statement exaggerates the true risk to livestock in northeastern Montana from the Fort Peck Tribes conducting a quarantine protocol on low-risk bison on tribal lands. The risk of brucellosis transmission from bison in quarantine to livestock, people, or other wildlife would be negligible. The Assiniboine and Sioux Tribes have constructed a double-fenced surveillance facility meeting the specifications used by APHIS during the quarantine feasibility study and agreed to the brucellosis testing requirements in the 2003 *Brucellosis Eradication: Uniform Methods and Rules* developed and tested by APHIS for Yellowstone bison (Clarke et al., 2014, *Journal American Veterinary Medical Association* 244:588-591). This facility is within a larger fenced pasture that further precludes mingling with livestock or other wildlife. Also, the National Park Service is initially proposing to send test-negative, non-reproductive bison to Fort Peck for quarantine. The testing protocol has proven that any bison this age that are infected with brucellosis bacteria would be identified and removed within seven months, prior to reaching reproductive age and potentially being able to transmit brucellosis. In addition, the tribes have developed a foreign animal disease emergency preparedness plan in conjunction with Montana to test for, and respond to, the outbreak of any foreign animal disease on any domestic and wildlife species on the reservation. Furthermore, the tribes have agreed to participate in the Montana Brucellosis Eradication Program and develop other agreements, as necessary, with the State of Montana and APHIS for carrying out a brucellosis testing program for bison sent to quarantine

Lastly, a few council members suggested Yellowstone National Park was not a good neighbor because bison were not managed like cattle on a ranch. Let's be clear—since 1985 the National Park Service has killed almost 7,000 bison to protect the livestock industry in Montana from the risk of brucellosis transmission—even though the disease was originally introduced into these wild animals from cattle and the risk is minute compared to elk which the State allows to freely mingle with cattle. In addition, Yellowstone National Park plays a large economic role in the tourism industry of the region. There were more than 4.1 million visits to the park during 2015, which contributed an estimated \$493 million to nearby communities, which supported about 7,730 jobs and had a collective benefit of about \$638 million to the area's economy. Over 90 percent of visitors indicated Yellowstone National Park was the primary reason for their trip to the area. Also, about 50 percent of summer visitors and 90 percent of winter visitors indicated seeing wild bison was an important factor in their decision to visit—wild bison moving freely across a vast landscape and dealing with predators and challenging environmental conditions.

Please distribute a copy of this letter to each Council member and post it online with the May 5, 2016, meeting information. If you have any questions or would like to discuss this matter, please contact me at (307) 344-2002 or Jennifer Carpenter, Chief of the Yellowstone Center for Resources, at (307) 344-2513.

Sincerely,



Daniel N. Wenk
Superintendent

cc: Tim Baker, Policy Advisor for Natural Resources, Montana
Floyd Azure, Chairman, Fort Peck Assiniboine and Sioux Tribes
Nadine Spencer, Secretary, Environmental Quality Council
Gene Vuckovich, Chairman, Environmental Quality Council Committee