
STATE OF MONTANA

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The Montana Department of Livestock (MDOL) supports the continued conservation of Yellowstone National Park (YNP) bison. Quarantine near YNP and within Montana's Designated Surveillance Area (DSA) as supported by IBMP partners has created several cohorts of brucellosis free bison.

The purposes of this Environmental Assessment (EA) are to determine whether the National Park Service (NPS) should establish a quarantine program for YNP bison and evaluate potential locations for the quarantine facility.

Unfortunately, all three alternatives have some minor to moderate negative impact. Alternative 1, (No action/No Quarantine Facility) is not a satisfactory means to meet the objectives outlined in this EA. It would cause an unnecessary increase in bison population within YNP and subsequently the increased movement of bison.

MDOL has the greatest concerns with Alternative 3 (Quarantine outside of Montana's DSA):

1. Alternative 3 would allow the movement of brucellosis positive pregnant females (the highest disease risk animal). As background, the Bison Quarantine Feasibility Study (BQFS) captured only young immature bison (9 months of age or younger). This age group was chosen because they are less likely to have previously been exposed to the disease. Regardless, 24 percent of the non-pregnant sexually immature bison that initially tested negative at the time of capture later tested as "reactors" after arrival at quarantine. Of those, 91% were culture positive.
Nonselective capture as proposed in Alternative 3 would include older and potentially pregnant bison. Because brucellosis is spread through abortion and birthing events (fetus, birth tissues and fluids), mature pregnant bison pose the highest risk. A mature pregnant bison that has very recently been exposed to the disease may not be serologically negative on the initial test yet it may still be incubating the bacteria and therefore poses a real risk of abortion during shipment or upon arrival at quarantine exposing other animals to the bacteria.
2. The shipment of positive YNP bison through Montana before quarantine and certification by the state veterinarian as brucellosis-free, is not allowed per Montana Code Annotated (MCA) 81-2-120(d)(ii) which states:
 - a. "(d) The live wild buffalo or wild bison may be captured, tested, quarantined, and vaccinated. Wild buffalo or wild bison that are certified by the state veterinarian as brucellosis-free may be:
 - (i) sold to help defray the costs that the department incurs in building, maintaining, and operating necessary facilities related to the capture, testing, quarantine, or vaccination of the wild buffalo or wild bison; or
 - (ii) transferred to qualified tribal entities that participate in the disease control program provided for in this subsection (1) (d)."
3. Lack of jurisdiction increases risk to the State's livestock industry. The State of Montana does not have regulatory authority in YNP or on the Fort Peck reservation. Alternative 3 would bypasses State animal health regulations that have been put in place to foster, promote, and protect the state's livestock industry. Livestock shipped off of the reservation do not currently have brucellosis testing requirements by the State of Montana (such as those that exist in the DSA and yet a domestic livestock brucellosis infection on tribal land would likely impact the entire state's livestock industry

4. USDA did change brucellosis regulations with an interim rule in 2010, and has recently proposed additional regulatory changes. However, federal regulations do not prevent additional restrictions from being placed by other states. If the State Animal Health Official (SAHO) of a trading partner state or buyers believe or perceive that the State of Montana has cattle at risk of brucellosis outside of the DSA, that state is likely to impose additional brucellosis testing regulations on livestock originating from that area. For example, for importation into the State of North Dakota a negative brucellosis test of sexually intact cattle ≥ 18 months of age originating from anywhere in Idaho is required.
5. An intensive regulatory brucellosis surveillance program is in place only within the DSA. Without this surveillance, the detection of a brucellosis infected herd would likely be delayed and pose a risk of spread.
6. No less than 100 percent inventory control is acceptable at a quarantine facility. Yet, follow up testing completed of the graduated quarantine bison currently on the reservation has revealed that inventory control is far less than 100%.
7. Public acceptance would be low. There have been recent verbal statements made by county commissioners to MDOL and an email sent to MDOL suggesting that local tolerance for YNP quarantined bison outside of Montana's DSA would likely be low. Local opposition to relocation of quarantine graduated YNP bison has been well established especially outside of the DSA. MDOL would expect an even more intense response to the relocation of positive YNP bison that have not graduated from quarantine.

MDOL supports Alternative 2 with some modifications which we feel best meets all five listed objectives with the fewest negative impacts. The BQFS referred to in this EA was conducted near YNP boundary within Montana's DSA and is an obvious model for this Alternative. As shown in the EA, it fulfills all of the stated objectives and has negligible to minor adverse impacts and moderate to major benefits to the conservation, genetic and cultural and nutrition impact topics.

Options and specific comment for meeting the EA stated objectives:

1. Augment or establish new conservation and cultural herds of plains bison
 - a. Bison quarantine within the DSA (similar to Alternative 2) successfully allowed for the movement of 87 brucellosis negative animals out of the DSA and 61 animals later to the Fort Peck tribes to fulfill this purpose.
 - b. Modified artificial insemination (AI) and embryo transfer (ET), is a lower cost with negligible disease risk method of genetic conservation and herd establishment. This method was presented to the IBMP by Dr. Barfield "Preserving Yellowstone bison genetics using assisted reproductive technology" and should be utilized in the future.
2. Enhance the culture and nutrition of Native Americans
 - a. Alternative 2 would allow for meat and quarantine negative animals to be supplied to tribes across the State and potentially U.S. and is consistent with 81-2-120 MCA.
 - b. Alternative 3 designates the bison to a single reservation (Fort Peck).
3. Conserve a viable wild population of Yellowstone bison
 - a. Alternative 2 has been demonstrated to fulfill this objective (see 1b above)
 - b. AI and ET should be strongly considered (See 1b above).
4. Maintain the low risk of brucellosis transmission from bison to cattle.
 - a. Alternative 2 does not increase risk of transmission outside of the DSA, and would likely meet with the least amount of public resistance

- b. Alternative 3 increases risk. It would allow for the movement of infected bison across the State of Montana to Fort Peck reservation which then pose a risk of transmission in an area that currently has no risk of transmission of the disease.
- 5. Reduce the shipment of Yellowstone bison to meat processing facilities.
 - a. Alternative 2 does not change the shipping needs. Bison captured for quarantined within the DSA would be captured without shipment. Only bison determined to be exposed would be shipped for meat harvest. Negative animals would be moved a short distance to quarantine within the DSA.
 - b. Alternative 3 would still requires the shipment of capture bison following testing and to the Fort Peck reservation putting the animals at risk of injury and increasing the risk of brucellosis transmission within that group.

Sincerely,

A handwritten signature in black ink, appearing to read "Marty Zaluski".

Marty Zaluski, DVM
State Veterinarian, Administrator
Montana Department of Livestock