



BUFFALO FIELD CAMPAIGN



**Western
Watersheds
Project**

Dear friends of America's last wild buffalo,

Buffalo Field Campaign and Western Watersheds Project recently [submitted comments to the National Park Service](#) on their Brucellosis Remote Vaccination Program for Bison in Yellowstone National Park. We are writing to encourage your opposition to this ill-conceived plan and your support for an environmentally preferred alternative to buyout cattle grazing permits on public lands in the Yellowstone, Madison, and Gallatin River valleys.

Our *Wild Buffalo Trust Alternative D* is a common-sense approach that effectively addresses brucellosis risk management by removing potential host cattle from the American bison's native range, and using fencing to deter elk and bison from commingling with any remaining cattle. Funding would come from the \$9 million taxpayer dollars intended to be spent vaccinating wild buffalo inside Yellowstone National Park over the next 30 years. Buying out cattle where conflict exists and conserving the habitat for native wildlife is a common sense, environmentally sustainable solution, and a wise use of public funds.

Our *Wild Buffalo Trust Alternative D* meets Yellowstone National Park's Congressional mandate to conserve and leave wild buffalo "unimpaired for the enjoyment of future generations" and is consistent with Park policies directing "protection of ecological processes and native species in a relatively undisturbed environment."

Vaccinating wild buffalo is part of the Interagency Bison Management Plan that treats wild buffalo--America's only wild buffalo to continuously occupy their native range--like livestock and not the national treasure that they are. The Park's vaccination plan will irreparably harm the identity and evolutionary adaptations of American bison as a freely migrating wildlife species and is an unacceptable impairment of Yellowstone National Park, wild bison, and the entire ecosystem.

The proposed vaccine, SRB51, is not approved for wild bison in Yellowstone National Park. In fact, it is an experimental vaccine developed for cattle. Use of this vaccine in wild bison would adversely affect natural selection, natural disease resistance and immunity, evolutionary adaptation, and genetic diversity of wild bison.

According to biologist James A. Bailey, PhD: "Disease has been a natural process throughout the evolution of bison. Natural selection has been the process to develop resistance and accommodation between host bison and their diseases. Accommodation includes evolution of the pathogen whereby the disease organism persists with little or no impact to the host. There is

already evidence of Yellowstone bison having resistance to Brucella infection . . . Moreover, there is considerable variation among mammals, including bison, in their reactions to Brucella exposure. This variation allows natural selection to operate in developing resistance and accommodation.”

The scientific “precautionary principle” of causing no harm needs to be followed by the Park in all of their decisions. The evidence suggests vaccinating buffalo with SRB51 could lead to increased levels of Brucella abortus transmission in the Yellowstone ecosystem and more virulent forms and stronger persistence of Brucella abortus in wild buffalo. Furthermore, the Park does not disclose potential negative impacts of the vaccine upon the native bison herds.

Prudence calls for the Park to take a hard look at alternatives, such as acquiring habitat by purchasing private lands and public land grazing permits from willing sellers to meet the nutritional needs of the species’ ability to naturally resist disease infection, and eliminating bison hazing, capture operations and other actions that disrupt bison occupying their habitat, and induce stress, or lead to injuries and other harms to wild bison and associated species in the ecosystem.

Additional harm comes from the Park capturing wild bison “as necessary” inside Yellowstone National Park at the Stephens Creek trap as part of their surveillance program, and enlisting the Montana Department of Livestock to capture bison on Horse Butte, Gallatin National Forest lands and at Duck Creek on private lands. These repeated, forced marches to traps is harming the buffalo by depriving the wildlife species of forage, exhausting and injuring buffalo by forcing the species to flee their habitat repeatedly for many miles. The Park also intends to spend nearly a million dollars immobilizing bison with drugs to determine if their vaccine is working or not.

As the buffalo are harmed by the agencies forcing them off their habitat, associated species are also disturbed including grizzly bears, wolves, bald eagles, migratory birds, moose, elk, and their habitat.

There has never been a case of wild bison infecting cattle with brucellosis in the wild. Brucellosis in the Yellowstone ecosystem came from cattle that infected native elk and bison populations.

Forcing bison to flee habitat for capture inside Yellowstone National Park, using immobilizing drugs and shooting livestock vaccines into buffalo at close range is part of the Park's endless, harmful intrusions into buffalo's evolutionary adaptation as an indigenous wildlife species and needs to be stopped by an effective public response. What will visitors from around the world think when they see Park Rangers shooting bison with paint guns in Yellowstone National Park? With the Park intending to vaccinate half the population annually, thousands of bison will bear such markings and tags.

Vaccinating wild buffalo inside Yellowstone National Park does not protect the wildlife species population from disease, will not placate Montana's cattle industry, and will not result in Montana “tolerating” bison migrating into the state.

Vaccination is a futile gesture to livestock regulators who have requested wild bison be subject to the Park's experimental vaccine but who have not committed to allowing wild bison to occupy habitat in Montana.

The idea of vaccinating Yellowstone buffalo is culturally unacceptable to American Indian Tribes and to all Americans who honor the buffalo's inherent wildness. How can the Park "mitigate" cultural concerns raised by Tribes including respectful treatment of bison, allowing them to roam freely without fencing or disrespectful hazing, vaccine contamination of meat for consumption and ceremonial purposes, and the preservation of wickiups, stone alignments, and other cultural features associated with bison?

The Park needs to stop harming our native wild buffalo using tools designed for domestic livestock and the cattle industry needs to be held accountable for introducing brucellosis to native wildlife. Rather than using an ineffective vaccine on wild bison, the cattle industry should take responsibility for developing an effective brucellosis vaccine for mandatory use in livestock.

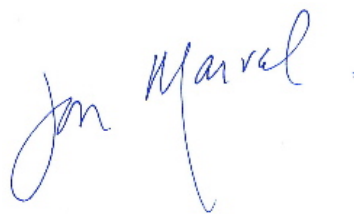
If ranchers feel there is no need to vaccinate cows with an approved livestock vaccine SRB 51, why is the Park subjecting wild bison to its experimental and unapproved use in Yellowstone National Park?

Vaccinating buffalo is a harmful, costly, wasteful and failed strategy as indicated by Yellowstone National Park's own evidence. The Park should show leadership and approach the U.S. Congress with funding ideas on how to conserve migrations of wild bison in Montana, embrace ideas like *Alternative D*, and forego population vaccination and slaughter without end.

Please join us in opposing Yellowstone National Park's ill-conceived vaccination program, in supporting *Wild Buffalo Trust Alternative D*, and in contacting the U.S. Congress to find appropriate uses of our taxpayer dollars to conserve, protect and restore wild buffalo on our public lands.



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