



BUFFALO FIELD CAMPAIGN

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March 19, 2010

Dr. Brian McCluskey
Director - Western Region
Veterinary Services
USDA Animal & Plant Health Inspection Service
Veterinary Service Area Office
208 North Montana Avenue, Suite 101
Helena, MT 59601

RE: Comments on Animal & Plant Health Inspection Service, Veterinary Services
Environmental Assessment for the Study of Shedding and Venereal Transmission of
Brucella abortus by Bison Bulls in the Greater Yellowstone Area.

Dear USDA Animal & Plant Health Inspection Service, Veterinary Services,

Thank you for the opportunity to comment on USDA Animal & Plant Health Inspection
Service (APHIS) Veterinary Service's (VS) Environmental Assessment for the Study of
Shedding and Venereal Transmission of *Brucella abortus* by Bison Bulls in the Greater
Yellowstone Area.

Buffalo Field Campaign was founded in 1997 to stop the slaughter of Yellowstone's wild
buffalo population, protect the natural habitat of wild free-roaming buffalo and native
wildlife, and to work with people of all Nations to honor the sacredness of wild buffalo.

Buffalo Field Campaign is located in West Yellowstone, Gallatin County, Montana and
also in Gardiner, Park County, Montana. We are supported by volunteers and citizens in
Montana, Idaho and Wyoming, and by people throughout the United States and from
around the world who value America's native wildlife and the ecosystems upon which
they depend, and enjoy the natural wonders of our irreplaceable public lands.

As an organization and on behalf of its members, Buffalo Field Campaign is concerned
and actively involved with protecting the last remaining descendants of indigenous bison
in North America to occupy their original range in the Greater Yellowstone ecosystem.
Buffalo Field Campaign actively publicizes the plight of the bison, to end their slaughter
by government agencies, and to secure long-term protection for viable populations of

wild bison and year-round habitat in the Greater Yellowstone ecosystem. Buffalo Field Campaign actively engages the American public to honor our cultural heritage by allowing wild buffalo to exist as an indigenous wildlife species and fulfill their inherent ecological role within their native range, and serve as the genetic wellspring for future wild, free ranging bison populations.

Buffalo Field Campaign would like to go on record as being adamantly opposed to this proposed study and actions taken against bison outlined therein. The following text will describe in detail our concerns and questions.

1. APHIS has given inadequate public notification on release of its Environmental Assessment to study wild buffalo bulls, and the period for public comment is insufficient to review its study in full, which lacks critical information.

- The release of the EA on IBMP.info and APHIS's website cannot be expected to service as fair and available dissemination of the document without more specific notification (i.e. agency email lists, announcement at IBMP public meetings). Also, notification for the public comment period was not posted on IBMP.info. Your research document was simply posted on the library page without public notice. Therefore, we are formally requesting that the public comment period be extended 30 days, and no less than 15 days upon your decision to extend the public comment period

2. APHIS does not identify the geographical range of its activities and the numbers, groups, and ages of bull bison for each breeding group or subpopulation in the population required for study during phase 1.

- While the total number of bulls required for tests during phase 1 of the study is explained there is no mention of how many bulls will be studied in each specific area; i.e. 25 in Gardiner and 25 in West Yellowstone, or 49 in West Yellowstone and one in Gardiner. This information is extremely relevant for the public's knowledge because this study could effectively mean all bulls in one or both of the proposed study area could be affected.
- The age range and groups of bull bison required for phase 1 is not communicated in the EA. This is pertinent information for several reasons.
 - First, if APHIS' study can be done on bull bison who have not yet left their family groups then the impact to those family groups must be considered, as well as the potential safety risks the workers of the study may face while gathering fluids from wild buffalo in the field. .
 - Secondly, if valid data can only be gathered from mature mating bull bison then selection of those mating bulls should be done so that no invalid data is gathered. Also the impact on bachelor groups must be considered and communicated in the EA if bull bison are to be selected from such groups, as well as the potential risks to workers who enter into habitat occupied by bull bison cohorts.

- Due to the lack of precise information in the EA on how cohorts, family groups, bull bachelor groups, are impacted we would ask that these details and situations be considered and communicated with the public in an additional evaluation by APHIS and opened to public review and comment.

3. APHIS, VS' study impacts public access to recreational areas and decisions on closure require agency permits. .

- It is stated in the EA that only permit(s) from Montana, Fish, Wildlife and Parks is needed to complete phase 1 of the proposed study. We contend that additional permit(s) are needed from U.S. Forest Service, Gallitan National Forest (GNF) to effect the closure APHIS intends. Our reasons for this are the spatial issues concerning where phase 1 of the study will take place, and also oversights on APHIS, VS's part in understanding the access and recreational aspects of the lands they seek to utilize during phase 1.
 - It is stated in the EA, Sec. 2. 'Human Health and Safety' under letter c. 'Other Potential Land Users', "During the time and in Zone 2 locations proposed for the study, USFS does not allow recreational activities on USFS land because of IBMP operational activities". This is not the case; any closure that happens on USFS, GNF land due to IBMP operational activities is a moving and temporary closure that surrounds an active haze and is lifted after that haze. Forest closures in effect for Zone 2 include a bald eagle nesting closure off Forest Road 610 in the vicinity of three occupied bald eagle nests on Horse Butte peninsula. Additionally, each spring there is a grizzly bear closure in effect for Zone 1 so bears can access winterkill securely in the Duck Creek, Richards Creek, Campanula Creek and Fir Ridge drainage. Therefore, APHIS would need to seek permission from GNF to implement additional closures to perform the proposed actions in the EA and permits from the USFS, GNF are required. If APHIS is seeking secure closure of public recreational lands, it should disclose what discussions, if any, it has had with the USFS, and what if any commitments have been made or secured to immobilize and handle wild buffalo on the Forest. Also, the human health and safety concerns for other potential land users as it is currently stated in the EA is inaccurate and needs to be re-evaluated and communicated after its revision with the public.
 - The same inaccuracy is stated in the EA again, in Sec. 3 'Vegetation and Physical Environment' under letter c. 'Recreational and Cultural Land Use', sub-number (1) 'Recreational Land Use'. Here it is stated that, "During the timeframe and location for the proposed study activities, recreational activities are restricted because of IBMP operational activities that occur in Zone 2 at that time of the year. Therefore, no changes would occur to land use by recreationists during this time of year as a result of the study activities". This is untrue. Any restrictions in the area due to IBMP operational activities are as stated above; Moving and temporary closures that surround an active haze are lifted after that haze. The areas

proposed for phase 1 included day-use recreational areas and over-night campgrounds on the Gallatin National Forest. There would absolutely need to be changes that occur to land use by recreationists during the timeframe proposed for phase 1 due to the proposed study activities for phase 1.

- A question we have concerning the proposed study activities for phase 1 are; in which areas does APHIS, VS assume that the USFS, GNF has closed or restricted land use by recreationist that are also frequented by bull bison during the proposed timeframe for phase 1? We feel APHIS, VS has assumed available areas for the studies data to be collected that do not exist. What will be the response to these problems in the field when they are realized?
- Due to the inaccuracies in the EA, as described above, we ask that that APHIS, VS re-evaluate the impact to public land use and access issues that will occur due to proposed study activities during phase 1, and communicate these findings with the public before a decision is made.

4. APHIS lacks the participation and permits from Yellowstone National Park that are needed to fully complete both phases of its study as proposed and outlined in the EA.

- To complete phase 2 of the proposed study during the rut season APHIS, VS would need to receive permission and permits from the NPS, Yellowstone National Park (YNP). YNP has stated that they have refused to grant this permit several times in the past and they see no reason why they would grant the permit in the future. Therefore, phase 2 of the study as proposed (during the rut) in the EA cannot happen in YNP. If APHIS, VS contends that there is “no tolerance” for bull bison in Montana where can they garner their data during the proposed timeframe for phase 2. And if there are bull bison in Montana during the proposed timeframe of phase 2 then there is obviously some tolerance for bull bison in Montana. As this EA is entitled, ‘Study of Shedding and Venereal Transmission of *Brucella abortus* by Bison Bulls in the Greater Yellowstone Area’, and appears that key data cannot be gathered for assessing the role of bison bulls in venereal transmission of brucellosis, we feel this EA as currently outlined is moot, and alternatively needs to be completely redone to reflect that bison bulls inside Yellowstone National Park will not be sampled as part of APHIS study.

5. Lack of cited evidence by APHIS, VS to support the purpose of its study.

- Several of APHIS, VS’s stated purposes for conducting these proposed studies are not backed by any evidence and/or are contradicted by participating partners of the IBMP.
 - One of the stated purposes of these proposed studies is to assess the possible role bull bison may play in venereal transmission of brucellosis to domestic cattle. We contend, that while in theory this maybe possible, there is no evidence that in the wild a bull bison would seek out a domestic cow to mate

with. An assumption of this magnitude, that plays such a major role in implementing such studies, should be supported by evidence before it is ever considered a reason to perform such studies. Grand Teton National Park, from our perspective, is 100 years of evidence that this would not happen in nature. On that landscape bison and domestic cattle co-exist and there has never been a documented occurrence of bull bison mating with domestic cattle.

- It is also stated in the EA; that from possible outcomes of these studies bull bison maybe granted tolerance in Montana. It is stated by APHIS, VS that currently bull bison have “no tolerance” in the state of Montana. Dr. Martin Zaluski, State Veterinarian and paid employee for the Department of Livestock (DOL), was quoted less than two month ago from this date (March 19, 2010) as saying he is, “still committed to tolerance for bull [bison] in Zone 2”. This is in direct contradiction to possible benefits for bull bison as a result of this study. While we feel that the tolerance bull bison currently encounter in Montana is not enough, there is no evidence that any data gathered from these studies would encourage the DOL to show more tolerance for bull bison in Montana.
- Due to the lack of evidentiary support for reasons to conduct the proposed studies, and the impact on bull bison involved in the study we would ask that this study be dissolved in its entirety.

6. Undisclosed information concerning the chemical to be use for immobilization and reversal.

- The specific chemical to be used in these proposed studies should be defined in the EA for the public. The public could then research and look for studies involving the chemical’s effect on large game species or specifically bison. This information could then be use for this public comment period. Due to the omission of these substances to be used in the proposed studies we would ask that the EA be revised to include the chemicals and the public be given time to review, and comment on the revised EA. APHIS must provide full disclosure for the chemicals/drugs they intend to use on bull bison for this inappropriate study.

7. No discussion for contingency plans concerning possible problems with chemical immobilization and reversal of wild bull bison

- There is no discussion in the EA about the possibilities for unforeseen problems concerning immobilization of wild buffalo in the field and/or chemical reversal miscues.
 - What is APHIS, VS’s protocol for bison bulls not going down after a first successful darting with immobilization drugs?
 - What is APHIS, VS’s protocol if bison bulls do not respond to initial chemical reversal?
 - What will APHIS, VS’s response be if the gathering of fluids takes longer than the 20 minutes proposed in the EA?

- What is APHIS, VS's protocol if an unexpected predator or threatened species like grizzly bears enters the area of the proposed study during and or after bison bull have been chemically immobilized?
- What is APHIS, VS's protocol for unexpected physical and/or psychological problems that may manifest in bull bison after chemical reversal?
- What are the protocols for APHIS, VS if an adequate amount of data cannot be gathered by the end of the 2011 migration, as outline in the EA? Are there plans now or will APHIS, VS create such plans to extend the proposed studies where there is insufficient data gathered?
- Although these issues are likely to arise during the course of these proposed studies the public should be aware of APHIS, VS's plan to mitigate potential risks to its researchers and bull bison from said unexpected events. For these reasons we ask the EA be revised to include such protocols and possibilities and the public be given time to review and comment on the revisions.

While your department may feel like it can garner useful data from the proposed study activities, we don't see how any data gathered from such studies could play a beneficial role for bison. The opportunity for these studies to creating more tolerance for bison in Montana seems less than possible when one consider that the Department of Livestock (DOL), who has been charged as the lead agency in the state over bison management, they control the fate of bison here not APHIS, VS. Sitting at the IBMP table for the last ten years or so with the DOL, APHIS, VS knows better than most that DOL's management styles are not based on science or benefit for bison. They reflect what is good for livestock and livestock producers and what is easiest for their field staff. The Board of Livestock (BOL) has said that the adaptive changes agreed to in '08 by the IBMP partners is the full extent of what Montana's livestock interests are willing to tolerate of wild bison, and this board is who runs DOL. These remarks are not made by the BOL because they have some damning scientific studies proving that bull bison pose a threat of transmission, they make these remarks because bison in general are viewed by their interests as direct competition and therefore a threat. If your department finds that no bull bison could ever transmit brucellosis to any other living creature ever, that wouldn't change the fact that bull bison eat a lot of grass, and THAT is what all this is about. How will your department deal with those attitudes and beliefs? If you want to help bison with tolerance in the state of Montana you should seriously consider reviewing, revising and/or removing your ancient and archaic federal brucellosis standards and regulations. Those issues play much greater a role in this centuries old battle then will ever the threat of transmission of brucellosis from a bull bison to cattle. Your department will do any study it wants to do regardless of what we say here, but we believe that dressing this study up to look like something else is not only naive and irresponsible on your department's part but also dangerous misinformation for the public.