

IBMP ROD -- Brucellosis prevalence in Yellowstone bison

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Scott, please distribute to the IBMP managers. This relates to an action item from the first day of the IBMP meeting. Thanks.

The Record of Decision for the Interagency Bison Management Plan does not appear to specify desired amounts of reduction in brucellosis prevalence for Yellowstone bison. However, a response to comments in the document indicates "... seropositive rates cannot remain as they are or increase, but must decrease over the life of the plan. In the selected alternative, this is accomplished primarily through bison vaccination" (page 57).

The following excerpts are from the federal Record of Decision for the Interagency Bison Management Plan.

<u>Page 8</u>: "The management actions we adopt here comply with the requirements of federal law, including those statutes listed above. They are based on the best available scientific information and are ecologically sound. They will provide for the conservation of bison in Yellowstone National Park and provide protection for the economic interest and viability of the livestock industry in the State of Montana. Moreover, they include a commitment by the federal and state agencies to work together on meeting these objectives."

Page 16: "The range of reasonable alternatives was defined by the purpose of the action, as described in the federal FEIS, incorporated and adopted by the Montana FEIS, which maintain a wild, free-ranging population of bison and address the risk of brucellosis transmission to protect the economic interest and viability of the livestock industry in Montana. Additionally, the agencies agreed that their cooperation is required to fully manage the herd and the risk of transmission of brucellosis from bison to domestic cattle in Montana. Given these two factors, the parties also identified nine specific objectives they believed each alternative had to meet before they could consider it a reasonable alternative. Those objectives are set out on pp. 42-45, FEIS, vol. 1."

In addition to the above-stated purpose, the agencies have agreed that nine objectives would guide them in determining whether an alternative is reasonable, and in selecting the preferred alternative. Each alternative must meet the following objectives:

- 1. Address bison population size and distribution; have specific commitments relating to size of bison herd.
- 2. Clearly define a boundary line beyond which bison will not be tolerated.
- 3. Address the risk to public safety and private property damage by bison.
- 4. Commit to the eventual elimination of brucellosis in bison and other wildlife.

- 5. Protect livestock nom the risk of brucellosis.
- 6. Protect the state of Montana from risk of reduction in its brucellosis status.
- 7. At a minimum, maintain a viable population of wild bison in Yellowstone National Park, as defined in biological, genetic, and ecological terms.
- 8. Be based on factual information, with the recognition that the scientific database is changing.
- 9. Recognize the need for coordination in the management of natural and cultural resource values that are the responsibility of the signatory agencies.

Page 22: "This plan is not intended to be a brucellosis eradication plan, but rather is a plan for the management of bison, intended to prevent the transmission of brucellosis from bison to cattle. Nevertheless, it sets forth actions to address brucellosis within the bison herd. To this end, Montana and the United States will work cooperatively towards the implementation of a Joint Bison Management Plan. This Joint Bison Management Plan reaffirms the principle purpose for action described in the Draft and Final Environmental Impact Statements "to maintain a wild, free ranging population of bison and address the risk of brucellosis transmission to protect the economic interest and viability of the livestock industry in Montana." A series of three adaptive management steps are prescribed in this Joint Bison Management Plan that will minimize the risk of transmission of brucellosis to cattle grazing on public and private lands adjacent to Yellowstone National Park and will, when all criteria are met, provide for the tolerance of a limited number of untested bison on public lands and private lands where permitted adjacent to Yellowstone National Park during winter. Implementation of the Joint Management Plan will not cause APHIS to downgrade Montana's brucellosis class-free status."

Page 57: "Response: The purpose, need and objectives were decided by the agencies as indicated on pages 42-43 of the FEIS (vol. 1). These objectives were developed over an extensive, systematic, multi-year planning process by the agencies. During this time, the public was frequently involved and consulted. However, ultimately, it is appropriate that the agencies charged with managing bison determine constraints imposed by their mandates and objectives set by their policies. The agencies agree that each alternative, including the modified preferred alternative would satisfy the purpose and need, and meet all objectives to a large degree. This reasoning is also reflected in table 11 of the FEIS (vol. 1). Eradication of brucellosis is not an objective; however, a commitment that the plan move toward elimination is. This means seropositive rates cannot remain as they are or increase, but must decrease over the life of the plan. In the selected alternative, this is accomplished primarily through bison vaccination. Preventing brucellosis in cattle is one of the purposes of APHIS' brucellosis eradication program; however, the purpose of action in the plan is confined to actions in the analysis area and is to "maintain a wild, free ranging population of bison and address the risk of brucellosis transmission to protect the economic interest and viability of the livestock industry in the State of Montana." Although the risk of transmission is low, it is not zero. Also, although the likelihood of two outbreaks and a downgrade in state status is also quite low, it is a possibility with serious economic ramifications, should it occur. Both are legitimate reasons for taking actions."