

Beartooth Stock Association
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December, 3, 2009,

To Whom It May Concern:

The Beartooth Stock Association, with its members located primarily in Stillwater and Carbon County, Montana, respectfully submit the following comments regarding the Concept paper for the Bovine Brucellosis Program from APHIS Veterinary Services:

First, we commend APHIS for recognizing that a new direction is necessary, and for taking the beginning steps to eradicate this serious disease of livestock and wildlife.

While we agree that a new direction is necessary, we firmly believe that more emphasis must be placed on eradicating the disease in the Bison and Elk herds in the Greater Yellowstone Area.

While we understand APHIS has little control or influence over State or Federal FWS or US Department of Interior, we believe that the wildlife component is an important part of a concept paper and must be addressed with as much detail as is possible at this stage.

In general, we feel that the concept paper has too many vague terms and very few specifics, such as:

1. What "certain practices and additional actions" will APHIS modify?
2. What specifically is risk based?
3. What is a risk based score?
4. The concept shifts the majority of the cost burden to producers and states with little likelihood of financial support for federal or state.
5. Will IBMP be continued and who will fund it?
6. What is "engaging" other agencies?
7. How will other states vets react and what assurance we have they will agree?
8. Why weren't producers involved in the beginning phases?

The following are a few of the specific concerns we have with the concept paper.

1. Wildlife (Bison and Elk) have a venereal disease (Brucella abortus). Elk have absolutely no plan or treatment in place and we there does not appear to be any plans for action on the part of State or federal FWS to implement one. While considerable time and effort into the Interagency Bison Management Committee, its recommendations are not being fully implemented
2. Wildlife (particularly elk) are expanding their boundaries and moving in greater numbers from the vector pool in and around Yellowstone National Park. The

FWS service reintroduction of wolves has had a significant effect on speeding up this expansion.

Concerns with the action plan numbered items.

1. Demonstrate...

Let's not forget that the cattle industry has won the battle against Brucellosis and has eliminated it from all livestock herd from the 50's 60's and 70's right up through the current loss and restoration of brucellosis free status.

2. Mitigate Disease Transmission from Wildlife. We applaud APHIS VS for recognizing that "to demonstrate the disease free status of the United States, we must mitigate risks from wildlife." We would like to see more specific examples of how FWP and interior would mitigate disease transmission from wildlife.

Additional actions required

Clearly identify parties and responsibilities involved. We need specifics that each collaborator will be charged with in order to "develop effective strategies to determine the location and range of brucellosis-affected wildlife, reduce prevalence of diseases in wildlife, and mitigate the risks of disease transmission. "

EXAMPLES

State and Federal Wildlife Agencies	1. Follow IBMP 2. Within a year: Develop plan for treating Brucella abortus in elk. 3.
US Department of Interior	4. Follow IBMP 5. Within a year: Develop plan for treating Brucella abortus in elk.
Congress	Mandate State and Federal Wildlife agencies and Department of Interior work on eradicating the disease

3. Disease responses and control. Outline the responsibilities of FWP and NPS in wildlife disease response and control.

The option of depopulation should be left to the producer. It is a case by case basis of whether a producer can stay viable under risk based management and testing and movement protocol. However depopulation occurs, it should be reimbursed at current market value for breeding livestock.

The costs of extra testing, feed, and livestock handling could be enormous and need to be accounted for and shared by NPS, NWS and or APHIS- not just the producer. "A multiple test-and-removal protocol and mitigation strategy to prevent intra-herd

transmission of the disease." For example, this could mean the necessity of feeding hay to a large number of cattle whose pasture is gone but need to be isolated from the rest of the herd.

While we agree that a mandatory identification system is necessary for trace back a "new" mandatory EID or tagging system is not necessary. The current methods work well, particularly in states with Brand Laws. Montana did their trace back in 48 hours through the state brand office.

4. Regulatory Framework. We agree more flexibility and expediency is needed. Agencies need to be able to address the real concerns and address them in a timely manner.

5. Risk Based Disease Management Areas.

1. This is a Disease management or elimination area and is not a "designated surveillance area" eliminate "surveillance and replace with "eradication" or "management" so it does not imply that no action will be taken.

2. Will other State Veterinarians recognize the new boundaries or insist on whole state testing as they currently do?

3. The IBMP must be followed.

4. An elk disease management plan must be developed.

6. Implementation oversight. The goal stated in the concept paper is to work closely with stakeholder to obtain input. Since it is too late to include producers from the beginning, please include producers in the future.

This section raises several concerns. All the bulleted responsibilities place the responsibility, weight and stress on the States and producers with no guarantee that any other state will accept cattle from a designated area or even a non-designated area. Specifically, producers are charged with generating the necessary funding to support the "industry and producer driven components of the brucellosis plan." It seems producers are to fund the testing required by the plan.

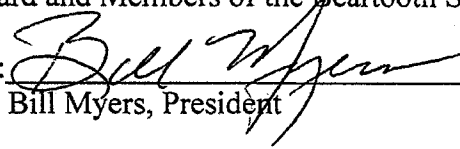
Additional Federal Roles and responsibilities

Require USFS and US department of Interior to develop a plan to mitigate and control the disease in wildlife.

Respectfully Submitted

Board and Members of the Beartooth Stock Association

By:


Bill Myers, President