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Subject: FW: For DA review: Comments on NPS EA, due today
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Environmental Assessment for the Use of Quarantine to Identify Brucellosis-free Yellowstone Bison for Relocation Elsewhere

Your comments were successfully submitted.

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Park: Yellowstone National Park
Project: Yellowstone Bison Quarantine Plan EA
Document: Environmental Assessment for the Use of Quarantine to Identify Brucellosis-free
Yellowstone Bison for Relocation Elsewhere

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The Animal and Plant Health Inspection Service (APHIS) respectfully submits the following comments to the National Park Service's environmental assessment to consider a quarantine program for Yellowstone bison at one or more new quarantine facilities.

Bison that have been exposed to brucellosis pose a risk for transmitting the disease. Up to 60 percent of the bison captured at Yellowstone National Park (YNP) that are candidates for quarantine are exposed. Moreover, when the Bison Quarantine Feasibility Study (BQFS) was being conducted, animals that tested negative at the YNP capture facility were transported to the BQFS facility to be enrolled in the study. Of the 112 bison in the second cohort that tested negative at the capture facility in 2008 and were transported to the BQFS facility, 27 (24 percent) were classified as reactors during post-arrival serological testing from May through December of that year. Of these 27, 91 percent were culture positive for *Brucella abortus* biovar 1.

This data shows that culture positive potentially infectious bison will be resident at any quarantine facility; thus, placing the quarantine facility in an area that already has brucellosis in its wildlife is the most responsible alternative. APHIS

recommends moderating the risk from exposed bison in a quarantine facility by locating the facility in an area adjacent to or inside YNP and within the brucellosis designated surveillance area.

Further, an animal that escaped from a quarantine facility in or close to YNP would not have to be euthanized, as most likely it would only come in contact with other bison or elk that have already been exposed to brucellosis. An animal escaping from a facility outside YNP or the designated surveillance area would probably have to be euthanized to ascertain transmission risk.

Comments:

Disease control and administration of the program would be complicated by locating exposed bison in a Tribal area (the Fort Peck reservation), as the Park Service is considering. Authority for disease control on reservations can be challenging if Tribes choose not to waive Tribal sovereignty.

After attending local public meetings and holding discussions with local residents over the last decade, APHIS believes there would be strong local resistance from both non-Tribal and Tribal cattle producers to locating and maintaining a facility holding exposed bison at Fort Peck. This concern is warranted; holding exposed bison at Fort Peck greatly increases the risk of brucellosis transmission from bison to cattle, as there are many more breeding cattle within roaming distance of Fort Peck than would be within roaming distance of a YNP facility.

In addition, our experience with BQFS graduate bison transferred to the reservation within the last 4 years has been disappointing. Inventory control has been poor; in every year of testing, some animals have not been captured or accounted for. A quarantine project requires accountability for all animals in the quarantine and strict inventory control.

Finally, conservation needs can be met through embryo transfer without putting surrounding communities at risk and with a much smaller financial investment.

APHIS thanks the Park Service for taking comment on the environmental assessment and looks forward to its decision on the bison quarantine.

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