



## United States Department of the Interior

National Park Service  
P.O. Box 168  
Yellowstone National Park  
Wyoming 82190

**RECEIVED**

MAY 31 2016

IN REPLY REFER TO:

N1615(YELL)

**LEGISLATIVE ENVIRONMENTAL  
POLICY OFFICE**

MAY 27 2016

Mr. Joe Kolman, Legislative Analyst  
Environmental Quality Council  
Legislative Environmental Policy Office  
State Capitol Building  
1301 East 6<sup>th</sup> Avenue, Room 171  
P.O. Box 201704  
Helena, Montana 59620-1704

Dear Mr. Kolman:

I appreciated the opportunity to speak with the Council on May 5, 2016, regarding the potential implementation of a quarantine program with Yellowstone bison at the Fort Peck Reservation. Unfortunately, several presenters at this meeting made inaccurate or misleading statements that need clarification and are addressed in this letter.

For example, a representative of the Montana Stockgrower's Association indicated the quarantine protocol only required two tests for bison to complete quarantine and be released elsewhere, which is incorrect. The testing protocol included in the Environmental Assessment (page 25) released by the National Park Service for the quarantine program was taken from Animal and Plant Health Inspection Service's (APHIS) *Brucellosis Eradication Uniform Methods and Rules* (2003) for livestock, including domestic bison, and includes three to five tests over a period of one to two and one-half years. However, we are testing bison more frequently during the first several months because previous work has demonstrated that any bison infected with brucellosis bacteria will be detected within the first seven months of the testing protocol. A similar protocol was used by the State of Montana and APHIS in the quarantine feasibility study with Yellowstone bison during 2005 to 2010, which demonstrated that bison repeatedly testing negative for brucellosis exposure through pregnancy and calving could be considered brucellosis-free. These bison were subsequently released on the Fort Peck Reservation.

In addition, a representative of the Montana Department of Livestock suggested the Environmental Assessment allowed bison to be sent anywhere within or outside the Designated Surveillance Area for quarantine. In reality, two specific sites for quarantine have been proposed: the Stephens Creek facility in Yellowstone National Park and the quarantine facility on the Fort Peck Reservation. The Environmental Assessment indicates additional NEPA/MEPA would need to be completed before quarantine could be conducted at other sites.