



*The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.*

July 13, 2010

Bison Ecology and Management Office  
Center for Resources  
PO Box 168  
Yellowstone National Park, Wyoming 82190

To whom it may concern:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Draft Environmental Impact Statement (EIS) for Bison Brucellosis Remote Vaccination in Yellowstone National Park (YNP).

Our comments are specific to our mission within state government: dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal has major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

The WDA supports YNP in their proactive efforts to follow the Interagency Bison Management Plan (IBMP) by reducing the spread of brucellosis to other wildlife and livestock through the vaccination of bison at the Stephens Creek capture facility near the YNP boundary. Brucellosis transmission to cattle on ranches neighboring YNP has long term catastrophic consequences, not only to the individual ranchers, but to the neighboring states and the beef industry as a whole.

We have reviewed the three alternatives stated in the EIS and offer our comments for each of the alternatives below as well as provide recommendations for a preferred alternative.

#### **No Action Alternative (A)**

The EIS states the No Action Alternative (A) is only sporadically implemented at the Stephens Creek capture facility. In the ten years YNP has used the IBMP only 136 bison were administered vaccine. Based on an estimated bison population in YNP of 3,000 animals, this equates to only addressing 4.5% of the population. While we understand the difficulty of working with the capture facility limitations, we find this effort inadequate in addressing the possible transmission of brucellosis to cattle on neighboring ranches. Given this information, the WDA does not support the Alternative (A).

#### **Second Alternative (B)**

The Second Alternative (B) offers a good faith effort to increase delivery of vaccination through remote methods to young, non-pregnant bison. However, the percentage of bison receiving the vaccine is limited and does not address the cows that are pregnant and possibly aborting calves

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and transmitting the disease amongst the herd. We do however, support the use of Biobullet® to vaccinate the herd and would strongly encourage YNP to incorporate this strategy.

**Third Alternative (C)**

We believe the Third Alternative (C) is the most comprehensive alternative offered in the EIS. This alternative will remotely vaccinate all female bison, including heifers and cows, which may or may not be pregnant using Biobullet®. We believe the risk of losing calves through abortion due to vaccination complications is more beneficial and worth the additional risk than either Alternatives (A) or (B). A certain percentage of non-vaccinated cows will likely abort due to the brucellosis infection. We do not believe the bison population will dramatically decline when a cow bison aborts due to the unlikely complications after being vaccinated. Despite this possible addition of risk, we strongly urge YNP accept Alternative (C) as their preferred alternative in the Final EIS.

Again, we want to thank YNP for adhering to the IBMP and finding alternative strategies to addressing this disease issue. We also urge YNP to continue their efforts to regularly test captured bison and remove any bison testing positive for brucellosis. We thank you for accepting our comments and look forward to receiving the Final EIS with the preferred Alternative (C).

Sincerely,



for Jason Fearneyhough  
Director

JF/jw

Cc: Governor's Planning Office  
WDA Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Rocky Mountain Farmers Union  
Wyoming Association of Conservation Districts  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
Wyoming Game and Fish Department  
Wyoming Livestock Board