



Wyoming
DEPARTMENT OF Agriculture

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

December 3, 2009

Docket No-2009-0006
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

To Whom It May Concern,

The following are comments from the Wyoming Department of Agriculture (WDA) pertaining to Docket No. 2009-0006 A Concept Paper for a New Direction for the Bovine Brucellosis Program Animal and Plant Health Inspection Service Veterinary Services (VS).

Our comments are specific to our mission: Dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As these proposed rule changes affect our agriculture industry, our natural resources, and the welfare of our citizens, it is important that you continue to inform us of the success or failure of these proposed rule changes and to continue to provide us the opportunity to express pertinent issues and concerns.

The WDA has long recognized a need for change in the National Brucellosis Program. Reviews of the bovine brucellosis program in 1989 and 1997 failed to address adequately the issues facing Wyoming's cattle producers in the Greater Yellowstone Area (GYA) face today. We realizes that until the last remaining brucellosis-reactor animal in the last brucellosis infected wildlife herd in the GYA is eliminated, there is at the least a potential risk to all Wyoming cattle producers.

In addition, the WDA agrees with Veterinary Services (VS) that new strategies need to be identified and adopted that can effectively develop management plans through a cooperative effort of federal and state veterinarians, federal and state wildlife agencies, state agriculture agencies and GYA cattle producers.

The WDA supports the proposed Action Plan for a New Direction of the National Brucellosis Program, and offers the following general comments:

- We agree with development of action plans for the five identified issues.

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- We agree with the plan's four core principles of the Designated Surveillance Area that concentrates resources on issues associated with brucellosis in elk and bison herds in the GYA and the risk these herds pose to livestock in the GYA.
- The WDA supports VS in exploring concepts that provide a national, status-based program that mitigates disease transmission from wildlife to cattle, enhances disease control, responds to risk quickly, and employ's a flexible risk-based disease management system.
- The WDA fully supports the federal government and VS in continuing financial support for Wyoming to identify a solution for the eradication of brucellosis in GYA wildlife herds.
- The greatest benefit in the proposed rule changes is that the State of Wyoming will no longer be at risk of losing its "brucellosis free" status.

In conclusion we appreciate the opportunity to comment on the Concept paper for a New Direction for the Bovine Brucellosis Program. We encourage continued attention to our concerns and look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,



Jason Fearneyhough
Director

JF/lb

CC: Governor's Planning Office
Wyoming Association of Conservation Districts
Wyoming Board of Agriculture
Wyoming Farm Bureau Federation
Wyoming Game and Fish Department
Wyoming State Grazing Board
Wyoming Stock Growers Association
Wyoming Wool Growers Association