

FW: brucellosis pieces  
Burt,Howard <[hburt@mt.gov](mailto:hburt@mt.gov)>  
To Quentin Kujala  
Wed. 11/07/2012 12:27 pm

Quentin,

I was going to try and summarize but decided to just let you read [REDACTED] comments as [REDACTED] stated them. I believe [REDACTED] has some good points but sometimes gets a little carried away. Anyway, take a look and sorry I didn't get this to you sooner.

Howard Burt

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**From:** [REDACTED]  
**Sent:** Wednesday, October 31, 2012 1:34 PM  
**To:** Burt, Howard  
**Subject:** RE: brucellosis pieces

Hi Boss-

I have some major concerns with this document and its production. I am somewhat mystified, as some of the folks on the panel have a very high level of familiarity with our own publications, and yet some key findings have been ignored. I think all parties should review and re-read a series of Kelly Proffitt's papers on elk distribution, group size, brucellosis risk, and factors influencing elk density. I would be very happy to provide these citations to anyone.

There are some points here that take us down some very dangerous roads. They are playing interests against one another, and I really have to wonder where the sportsmen's voice is in

all this. We could be paying landowners to fence out elk? Paying for vaccination? All the while reducing elk populations and thusly elk opportunities for sportsmen?

I really hope that SOMEONE in our agency stands up to some of the points presented in here, or we may face some major problems in the future.

Below, please find my key points and concerns.



Brucellosis recommendations document # 1 comments:

1) For the fundamental objective “minimize transmission”, does this mean minimize elk-elk, elk-livestock, or livestock-livestock? There are several means objectives which are not specific or which I have problems with. Vaccination protocols – this has to mean for cattle, right? Is it really MFWP’s objective to develop a vaccine and vaccination protocols? To “eventually eliminate Brucellosis” – is this in livestock or in elk? In wildlife, is this even a reality? To minimize seroprevalence in elk within the DSA through measuring seroprevalence? We can measure, but how do we minimize? Only the final one makes any sense to me. I thought means objectives were supposed to provide steps to reach the fundamental objective!

2) For fundamental objective – “maximize acceptability of elk management tools”... one means objective is to minimize regulations/regulation changes on restriction of current export of MT cattle. It reads – “consultation between Department of Livestock & FWP”. Is that really our role? Do we have any voice in regulations changes for MT cattle export? For that matter, what is our role in the other 2 objectives?

3) Action alternative Hunting: it says to reduce winter herd size and density. But herd size and density are not necessarily related to seroprevalence! The Northern Yellowstone herd declined from 20,000 to 6,000 or fewer, and during that time, seroprevalence went up! The only way I would agree with this point is if they wrote “reduce winter herd size and density in areas over population objective”. Other hunting points are VERY concerning to me. Given that hunting alone will not decrease brucellosis, WHY should we hunt after Feb 15<sup>th</sup>? There are important ethical considerations as to why we have obeyed that date. I have a lot of problems with the idea of reducing herd sizes to wantonly reduce brucellosis while probably not correcting some of the sources of this problem (i.e., feedlots in WY). Furthermore, I think of the Madison-Gallatin herd as an example here. Elk move out of the Gallatin into the Madison during winter. The more we hunt during winter, the more we are reducing a herd which spends summer on public lands and is publicly accessible through early hunting

season, AND which is BELOW objective. We could be really hurting our Gallatin herd by allowing post-February hunting. I do have radio-collar data showing mid-winter migrations out of the Gallatin to back this up.

4) Action alternative Containment: elk proof fencing? Isn't this a major wildlife migration issue for way more than just elk? Is this saying that wildlife have no place on private lands? Publicly funding cattle feeding areas is not going to be a popular alternative – sportsmen's dollars are to go to fencing cattle? Wolf pack numbers – could possibly use reduction in some areas, but just saying to reduce wolf numbers by habitat is not paying attention to whether wolves are affecting elk distribution at all. Lest I be completely negative, it is worth pointing out that I do appreciate decreasing harboring (where/if we can), purchasing more WMA lands, and endorsing collaborative incentives for access. These last 3 are much more agreeable.

## Brucellosis Detail Actions #2

1) Point 1 – hunting. I appreciate increasing available wintering habitat, but not identifying a reduced population objective. This would be a major impact on lands well beyond the winter grounds. If elk are wintering in just a small portion of their overall range, we are affecting much more than just the landowners who see the elk in winter. Madison valley elk come from YNP, Taylor Fork, Cabin Creek, Henry's Mountains, and Idaho. Reducing their numbers will not necessarily reduce seroprevalence and will result in a large local economic impact, and reduction of sportsmen opportunities. As far as late season hunting (after Feb 15) – I've already pointed out how this is a challenging idea. I do wonder how they suggest we use season structure to address harboring. Moving to cow-only seasons? Well, how does that affect an area that is currently at or below objective?

2) Point 3 – containment. Annual resource allocation for elk-proof fencing? We've been working to ensure wildlife-friendly fence. This is quite a shift.

## Detail actions – document #3

1) Herd size reductions: I have long understood the point that reducing herd size/density some folks believe will result in fewer opportunities for elk-elk transmission. Again I ask – then why and how has seroprevalence in the NY increased?

2) Hunts beyond Feb 15: I hear their point that they could influence elk distribution. But doesn't much of MFWP's work show that hunting may actually CONCENTRATE elk? See Proffitt's paper on elk distribution in the Madison. Note also that this paper examines the influences of locally present, radio-collared wolves and finds a minimum of effect. This should also be noted when examining the containment point relative to wolf pack reduction.

[REDACTED]

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[REDACTED]

[REDACTED]

**From:** Burt, Howard  
**Sent:** Wednesday, October 31, 2012 10:02 AM  
**To:** [REDACTED]  
**Cc:** Flowers, Pat  
**Subject:** FW: brucellosis pieces

Any comments please send them to me and I will compile and forward to Quentin.

Thanks,

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**From:** Kujala, Quentin  
**Sent:** Wednesday, October 31, 2012 9:23 AM

**To:** FWP #WL Mgrs; Denson, Scott; Burt, Howard; Northrup, Rick; Ramsey, Jennifer; Anderson, Neil; Pauley, George; Gude, Justin  
**Cc:** McDonald, Ken  
**Subject:** brucellosis pieces

All—

Trying to be efficient with your time, I have attached only some of the documents we'll be presenting to the Commission on Nov 8 for their first (tentative) adoption with a public comment period to run thru Dec 20. You've seen much of this before—I apologize but also continue to be anxious for your awareness.

The first document includes the literal working group products that we will be presenting for Commission adoption—these include issue statement, objectives and “preferred” action alternative. Note the alternative should be viewed as only a partial list—other actions that may potentially speak to adjusting elk distribution may also be identified/included at some later time. Note also that the recommendation includes the concept of local working groups (new or already established, temporary or otherwise) to help FWP identify and implement specific actions. Note also again there are hunting season actions here as well as habitat efforts.

The second document focuses on the literal action items and tries to put them in the context of process/timeline (for example, a hunting season proposal going thru biennial season setting process).

The third document is an effort to present the different action items relative to the stated objectives.

The last (PDF) document is a map of those HDs currently with the MT Dept of Livestock's Designated Surveillance Area (DSA).

Especially for R3, you might want to take a close look here. And for anybody with elk and/or WMAs, you might also take a close look here. Certainly I am eager to hear any points you might pass along that could be stressed in the presentation or elsewhere.

Justin, I would further ask you to think about who we would send the initial adoption to in light of the working group's interest to have a "peer review". We had talked previously about other states' mgmt and/or research staff. Also maybe YNP? I don't know if we need to do any "heads up" there—or just send the adoption and review request in one delivery. Thanks again for your work already on some of the human dimension pieces that will likely come into play here.

To be clear, these will be presented at the Nov 8 Commission meeting but are also available now for further distribution as/if you see fit.

Thanks and sorry,

Q