

Gene Snelson

From: Carol Pivonka
Sent: Monday, July 15, 2013 4:45 PM
To: 1-legal
Subject: FW: Chapter 35 Brucellosis
Attachments: Texas Animal Health Commission submitted comments 07152013.doc

Carol S. Pivonka

Executive Assistant for Dr. Dee Ellis
Carol.Pivonka@tahc.texas.gov

From: Kujala, Quentin [~~mailto:quentin.kujala@mt.gov~~]
Sent: Monday, July 15, 2013 4:18 PM
To: comments
Subject: Chapter 35 Brucellosis

Texas Animal Health Commission:

In response to the proposed rule to increase brucellosis testing requirements for cattle from Montana, attached please find short comment letter submitted by staff on behalf of listed citizen members of Montana's Elk Management Guidelines in Areas with Brucellosis Work Group. In the same representative light, the work group members thank you for the opportunity to submit comment.

Regards,
Quentin Kujala
bureau coordinator, Montana Fish, Wildlife and Parks
(406)444-5672

July 15, 2013

Texas Animal Health Commission:

The Montana *Elk Management Guidelines in Areas with Brucellosis Working Group* (EBWG) was first assembled in January 2012 to explore and recommend elk management actions to reduce the risk of brucellosis transmission between elk and livestock. Submitted by members of this citizen working group, this comment letter is in response to the proposed rule requiring additional testing for brucellosis in cattle entering Texas from Montana.

The EBWG represents a broad involvement of veterinarians, hunters, conservationists, and livestock producers with a goal of proposing practical and socially acceptable management to reduce the chance of brucellosis transmission between elk and livestock. In late 2012, the EBWG presented management tools for consideration by the Montana Fish, Wildlife & Parks (FWP) Commission that included dispersal hunts, spatial separation through fencing, and herding/hazing at critical times of the year.

These recommendations were adopted and rapidly implemented in winter/spring 2013 with significant success as determined by FWP personnel, the Montana Department of Livestock, and landowners. The EBWG deliberations have been enhanced by the ongoing live capture elk study that identifies the range of positive elk to define the cattle populations at risk. This ongoing scientific study measures not only the range of seropositive elk but elk movements and distribution at critical times of the year within and adjacent to Montana's Designated Surveillance Area (DSA). Alongside livestock management efforts described within the regulatory framework of the DSA, this contemporary elk information is being used to identify and decrease commingling and potential transmission between elk and livestock via the EBWG recommendations.

In conclusion, these significant and effective efforts by Montana citizens, the livestock industry, and governmental agencies are made in good faith to address potential brucellosis transmission and other states' concerns and have proven not only effective relative to brucellosis transmission and detection but also nimble in administrative response to new information. The EBWG recommendations are a critical piece of Montana's comprehensive management plan which not only addresses livestock surveillance activities but also the dynamics of elk and cattle interaction. The proposed Texas rule essentially dismisses these considerable efforts by Montana. In this light, members of the EBWG identified below respectfully request a "do not pass" on the proposed rule for additional testing of Montana cattle entering Texas.

Submitted by EBWG staff on behalf of those members of the Montana *Elk Management Guidelines in Areas with Brucellosis Working Group* listed below (in alphabetical order):

Mark Albrecht, Bozeman MT
John Anderson, Alder MT
Ed Bukoskey, Rosebud MT
Joe Cohenour, East Helena MT
Rick Douglass, Butte MT

Ken Hamlin, Bozeman MT
Ray Marxer, Twin Bridges MT
Dick Raths, Lewistown MT
Tom Rice, Dillon MT