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United States  
Department of  
Agriculture

Marketing and  
Regulatory Programs

Animal and Plant  
Health Inspection  
Service

Veterinary Services

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Dear Fellow IBMP Members:

It would appear from our last brief meeting that the collaborative atmosphere was absent and that the mode of communication most likely to be considered has temporarily become the formal letter. This is unfortunate in that it slows an already torpid process but fortunate in that an individual member's position may be clearly stated for the record. Now I, too, am going to take advantage of this approach.

Arthur Conan Doyle wrote that "It is a capital mistake to reason without data." At issue in comments made both in letters and at our meeting is: What constitutes enough data to make a reasoned decision about making alterations to the 2008 Adaptive Management Plan? Having built models exploring the relationship of disease and environmental factors myself, reaching statistical significance given the many factors suggested in the NPS' letter of January 26, 2010 (central herd size, number of bison on Horse Butte, number of bison in the Madison Valley, snow pack, response of bison to hazing actions, residual forage biomass, forage green-up) and the interaction of these factors will be elusive without many, many years of data. So while one year of data is suggested to be woefully inadequate, do we require a specific "level of confidence" that a decade of data might bring to make a reasoned decision to alter the current plan? I would certainly hope not. As in a clinical drug trial, when one treatment becomes quickly evident to be harmful to participants or one treatment is quickly evident to be far superior to another, the trial is altered to provide the greatest health benefit, even if the statistical confidence in the study has not been reached. If there is no tolerance for bison in Zone 3 at any time, actions initiated to prevent that are warranted even if it may impede the complete understanding of the migration of bison out of YNP.

It was clearly stated by the MDOL that the trigger points recommended were recommendations, a starting point for negotiations as to how best to effect the elimination of Zone 3 breaches. I suggest we return to negotiating which trigger points might be implemented in the Spring 2010 management season.

Also at issue are suggested mitigations to reduce the risk of brucellosis transmission from bison to cattle. These mitigations appear solely focused on spatial and temporal separation of bison and cattle through strategic fencing and appropriate timing of cattle returning. It would be difficult to argue against the view that the most effective mitigation to reduce the risk of brucellosis transmission from bison to cattle is to reduce and eventually eliminate disease from bison. Reduction and eventual elimination of disease makes moot any management actions initiated for hindering disease transmission.



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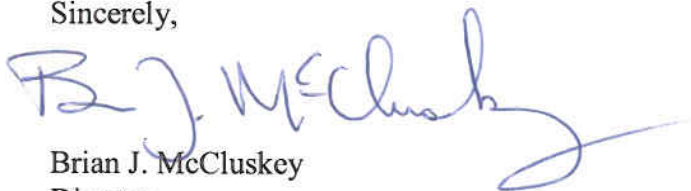
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Fellow IBMP Members

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Reduction and eventual elimination will facilitate the eventual range expansion of migrating bison. To this end, APHIS encourages the IBMP partners to actively and with great haste pursue any and all actions that will reduce the prevalence of brucellosis in wildlife populations in the Greater Yellowstone Area, including bison from YNP. APHIS supports the actions listed in the MDOL letter of February 1, 2010, including the rapid initiation of vaccinating bison in YNP, investigating the potential disease prevalence reduction benefits of immunocontraception, and maintaining appropriate bison populations within YNP.

Sincerely,



Brian J. McCluskey  
Director

cc:

J. Dick, Assoc. Deputy Administrator, VS, Washington, DC