
STATE OF MONTANA

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September 30, 2022

RE: Comments on the Draft 2023 Annual Work Plan for Elk Management in Areas with Brucellosis

Montana Fish Wildlife and Parks Commission

Thank you for the opportunity to comment on the proposed “2023 Annual Work Plan for Elk Management in Areas with Brucellosis.”

The Montana Department of Livestock (MDOL) administers Montana’s brucellosis program and the regulations associated with the Designated Surveillance Area (DSA). The DSA, in southwest Montana, was designed with two goals in mind. The first, to mitigate the transmission of brucellosis from wildlife to livestock species (cattle and domestic bison). The second is the rapid detection of transmission events to prevent the movement of brucellosis positive livestock outside of the DSA. Surveillance is accomplished by a robust testing program, including official identification of DSA cattle and domestic bison.

Landowners who graze cattle or domestic bison within the DSA have limited tools to prevent elk/livestock comingling events other than those outlined in the Fish Wildlife and Parks (FWP) annual elk work plan. Transmission of brucellosis from wildlife to livestock has substantial impacts for the impacted livestock owner, for adjacent herds, and potentially for all of Montana’s livestock industry.

MDOL encourages the adoption of the proposed changes to the 2023 plan:

- 1) Allow the use of elk management tools within the DSA and in other specific areas where brucellosis-exposed elk have been confirmed.
- 2) Add the exploration of new hazing techniques based on the efficacy of past efforts and new research findings. New hazing techniques could include the use of drones, dogs, remote cameras that alert landowners to elk presence, hazing even when elk are not present, or hazing at night. The work group recommends implementing at least one new technique in 2023 followed by an analysis of efficacy.
- 3) Add the expanded opportunity to use fencing that reduces the ability for elk to cross into or use high-risk areas, such as calving pastures. This fencing was previously authorized for use only in the Paradise Valley.
- 4) Add the target of implementing at least one habitat manipulation project that encourages elk to stay away from high-risk areas in 2023 followed by an analysis of efficacy.
- 5) Remove the annual cap of \$2,500 per landowner for fencing material.

These changes provide potential tools that can be used to mitigate disease transmission to livestock. In addition to the adoption of these changes, MDOL encourages the Commission and FWP to continue wildlife research efforts that mitigate disease spread within wildlife populations and advance the development of new tools that can help producers reduce the threat of brucellosis to their animals.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Marty Zaluski". The signature is written in a cursive style with a large, stylized "M" and "Z".

Marty Zaluski
State Veterinarian, Administrator Animal Health and Food Safety Division
Montana Department of Livestock