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# STATE OF MONTANA

STEVE BULLOCK, GOVERNOR

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September 20, 2018

Re: Comments on the Elk Management in Areas  
With Brucellosis - Proposed 2019 Work Plan

Montana Fish Wildlife and Parks Commission

Thank you for the continued partnership and cooperation between our agencies and the opportunity to comment on the proposed 2019 work plan. We appreciate the collaborative efforts to address brucellosis issues in Montana. The Montana Department of Livestock (DOL) supports the proposed 2019 annual work plan with the following recommendations.

- We appreciate that this document acknowledges that concentrations of elk can contribute to the risk of transmission. These concentrations not only increase the risk of transmission to livestock but also within wildlife populations.
- DOL supports any Commission efforts to address the spread of brucellosis within or between elk populations.
- We recommend that the use of the language; “Montana’s Designated Surveillance Area (DSA) or another state’s DSA” be expanded to include all areas where brucellosis exposed elk have been documented to exist. For example, Wyoming has found seropositive elk in the Bighorn Mountains in their State. They have labeled this area a “Brucellosis Area of Concern” rather than a DSA. Elk from that area have been documented to move into some locations in Montana. Utilizing the term DSA would not allow for management actions adjacent to such a location. The language could be simplified to say “adjacent to a DSA or other area where brucellosis exposed elk have been documented to exist”.
- We recommend that the conditions for FWP assistance are clearly defined so they can be consistently applied to all requesting producers. These conditions may be defined in another document.

The management tools outlined in the work plan could help reduce risk of brucellosis transmission and the availability and use of these actions contributes to improved landowner tolerance.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Marty Zaluski".

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