



# STATE OF IDAHO

PHILIP E. BATT  
Governor  
PATRICK A. TAKASUGI  
Director

DEPARTMENT OF AGRICULTURE  
DIVISION OF ANIMAL INDUSTRIES

2270 Old Penitentiary Rd.  
P.O. Box 7249  
Boise, Idaho 83707  
(208)332-8540

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RECEIVED BY U.S. FISH  
AND WILDLIFE SERVICE  
GRIZZLY BEAR RECOVERY  
COORDINATORS OFFICE

DEC 01 1997

Dr. Christopher Servheen  
Grizzly Bear Recovery Coordinator  
U. S. Fish and Wildlife Service  
P.O. Box 5127  
Missoula, Montana 59806

**Re: COMMENTS ON DRAFT EIS FOR GRIZZLY BEAR RECOVERY IN THE  
BITTERROOT ECOSYSTEM**

Dear Dr. Servheen:

Recent revelations concerning Grizzly Bears have come to light that have a significant impact upon reintroduction of this species into Idaho.

At a recent meeting of the Greater Yellowstone Interagency Brucellosis Committee (GYIBC) there was considerable debate about the bio-safety of vaccines utilized to immunize cattle, elk and bison against Brucellosis. These vaccines include Strain-19 *Brucella abortus* vaccine and RB 51 *Brucella abortus* vaccine. Strain-19 has been used to immunize cattle and bison against Brucellosis for many years and to immunize elk against Brucellosis for the past ten years. RB 51 is a new vaccine that has been utilized to immunize cattle and privately owned bison for the past sixteen months. Some GYIBC members have proposed the vaccination of elk on the National Elk Refuge with one of these vaccines.

U.S. Fish and Wildlife Service (FWS) and the National Park Service (NPS) representatives on the GYIBC insist that

neither of these vaccinal products be utilized for immunization of bison or elk, on lands managed by either FWS or NPS, until bio-safety research has been accomplished to prove that the vaccinal products are safe in non-target species. Non-target species of concern include Grizzly Bears.

Research on the impacts of Brucellosis vaccines on non-target species has not yet begun. It will take a number of years and cost millions of dollars to accomplish. We doubt that adequate bio-safety research can even be accomplished on endangered species such as the Grizzly Bear.

Each year over 200,000 doses of Brucellosis vaccine are utilized in the state of Idaho to immunize cattle and domestic bison against Brucellosis. Currently there are approximately 1,155,000 cattle in the state that have been vaccinated with either Strain-19 or RB51. At least 150,000 of these animals are located within the Idaho portion of the proposed Bitterroot Grizzly Bear Primary Analysis Area.

It is highly probable that introduced bears will frequent areas where vaccinated cattle are kept, have contact with vaccinated cattle and consume vaccinated cattle carcasses (either as a kill or as carrion). We cannot assume there will be no adverse impact on the bears from contact with one of these vaccine products.

1 | The impacts of Brucellosis vaccines on Grizzly Bears were not addressed in the Grizzly Bear Recovery in the Bitterroot Ecosystem Draft EIS, therefore the EIS is inadequate. Research on bio-safety of these vaccine products must be conducted, to prove that they will not have a deleterious impact on Grizzly Bears, before a final EIS can be developed. The Draft EIS must be withdrawn and re-written or amended to include results of the research, with appropriate comment periods, to address this vital issue. The Brucellosis vaccine bio-safety issue must be resolved before a final decision is made relative to reintroduction of Grizzly Bears to the state of Idaho. If there is a bio-safety concern, relative to Grizzly Bears, on lands administered by FWS or NPS, there must also be the same bio-safety concern for Grizzly Bears regardless of land ownership or management.

2 | The Division of Animal Industries, Idaho Department of Agriculture, is responsible for regulating the importation

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of animals into the state of Idaho. Until such time that the two Brucellosis vaccines have been proven, by peer reviewed research, to be safe in Grizzly Bears we cannot allow the importation of Grizzly Bears into the state of Idaho.

Sincerely,



Bob Hillman, DVM  
Administrator

c.c. Governor Phillip E. Batt  
Patrick A. Takasugi, State Department of Agriculture  
Idaho Congressional Delegation  
Representative Doug Jones, House Agricultural Affairs  
Committee  
Senator Cecil Ingram, Senate Agricultural Affairs  
Committee  
Steve Mealey, Department of Fish and Game