



Rocky Mountain Region Office

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[www.defenders.org](http://www.defenders.org)

Bison Translocation  
Wildlife Division  
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**Re: Comments on Draft Environmental Assessment, Bison Translocation, Bison Quarantine Phase IV**

Dear FWP Representatives:

Please accept these comments on behalf of Defenders of Wildlife, a non-profit wildlife conservation organization whose more than one million members and supporters nationwide, including more than 3,000 Montana residents, greatly value the genetically important Yellowstone bison affected by this translocation proposal.

We write in support of Alternative D, the translocation of all 88 currently available brucellosis-free bison from quarantine facilities near Gardiner, Montana to the Green Ranch west of Bozeman, Montana, operated by Turner Enterprises. Under Alternative D, Turner Enterprise would keep these bison in quarantine for 5 years as required, with the herd expected to grow to about 340 over this time. All of the research herd and 25% of their progeny would be returned to FWP; the rest would become Turner's property to offset an estimated \$480,000 in costs. These bison may be used to increase the genetic diversity of the important genetically "pure" Castle Rock herd in New Mexico that originated from Yellowstone in the 1930s, also owned by Turner Enterprises, and could be used to propagate genetically pure herds on other Turner Enterprise ranches, including the Flying D Ranch of which the Green Ranch is a part.

Defenders of Wildlife feels strongly that any plan for these Yellowstone bison must benefit bison conservation and must optimize the public good. The genetically pure, disease-free bison from the Yellowstone quarantine facility have tremendous conservation value and the ideal solution for their translocation is to relocate them to available public or tribal lands where they will be managed as wildlife over as large an area as is possible.

However, Montana Fish, Wildlife and Parks (FWP) has failed to develop a statewide strategy for managing bison as wildlife despite many long-standing and repeated requests to do so from Montana citizens and organizations, or even to develop any site-specific alternatives to slaughter for quarantined Yellowstone bison. The EA dismisses moving the quarantined bison to other public lands in Montana because no statewide bison plan presently exists. Specifically dismissed are FWP-managed State Wildlife Management Areas (WMAs), none of which currently have the infrastructure in place to hold the quarantined bison.

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We understand the difficulty FWP has experienced with finding adequate sites willing to accept these bison, but we point out that FWP has helped to create this unfortunate situation by stalling its plans to complete a statewide bison conservation strategy that would identify public and tribal locations within Montana for restoration of these important bison. These plans should have been developed years ago. Had this plan been completed by now, we may have had a clear path forward. The need to complete this plan is even more urgent because of the recent decision to not continue the quarantine facility study beyond the original time frame. For these reasons, it is essential that FWP complete a statewide bison plan as soon as possible.

Specifically, we ask that FWP initiate a statewide public scoping announcement detailing the Department's intentions to consider management of bison as a big game species on an appropriate landscape(s) in Montana. In addition to federal and tribal lands, the plan should consider WMAs as locations in which FWP itself may play a direct land management role in bison conservation in Montana. FWP should also continue to focus efforts on securing additional bison habitat adjacent to Yellowstone National Park to expand the region's carrying capacity for bison, and to alleviate the perceived need to slaughter bison that leave Yellowstone as bison numbers continue to increase.

As things stand, however, it is unrealistic to expect FWP to come up with a state-wide plan in the time frame needed to complete the quarantine experiment in a manner that is humane to bison (i.e. outside of the cramped quarantine facilities), or to do the necessary groundwork and administrative, legal and other processing to come up with a site-specific relocation plan in time for this first group of quarantined bison. Further, public land managers did not submit any requests for these bison other than Wyoming's Guernsey State Park which, though appreciated, is simply not large enough to support a viable herd of at least 1,000 bison. Transferring these bison to federal or state lands of sufficient size to support viable populations that can be managed as wildlife is at least as important as transferring these bison to tribal management, but the groundwork has not yet been laid by public lands managers or wildlife management agencies.

Defenders of Wildlife continues to support the proposal from Fort Belknap Fish and Game. With unanimous tribal council support, Fort Belknap Fish and Game proposes to replace their existing bison herd on 22,000 acres with these Yellowstone bison and their offspring. This is clearly beneficial to bison conservation and to the public good, especially to the Fort Belknap Gros Ventre and Assiniboine public. FWP rejected this proposal for now due to a lack of infrastructure in place to take the bison immediately.

We have assisted Fort Belknap Fish and Game with expanding their bison program, including helping to purchase two additional pastures to expand their available land base for bison to its current 22,000 acre size. We intend to continue to help expand the bison area as opportunities arise, as well as continue to help other tribes – including the Assiniboine and Sioux Tribes of Fort Peck and the Oglala Lakota of Pine Ridge – with their bison programs, some of whom may be interested in Yellowstone bison in future years. We also intend to continue to work with Fort Belknap to prepare their facilities for the next available bison from the Yellowstone quarantine facility. FWP can help this effort. We request that FWP commit publicly to giving some of the quarantined bison that will be available in fall 2010 and 2011 to Fort Belknap Fish and Game. A commitment will aid Fort Belknap and NGOs in successfully raising the funds necessary to complete the infrastructure in time for the next round of available bison.

It seems likely that alternative or expanded locations could be found for the quarantined bison until Fort Belknap Fish and Game is ready to receive them. However, since we believe management of quarantined bison by Turner Enterprises is a net gain for bison conservation because Turner Enterprises is capable of and committed to managing one or more genetically pure herds of bison, we do not think keeping all existing bison in a quarantine facility for future translocation to the Fort Belknap Reservation or elsewhere is necessary or humane. All of the bison translocated to the Green Ranch and 25% of their offspring under Alternative D will be available for the propagation of tribal or public conservation herds.

In the absence of any statewide FWP bison strategy or plan, and given the urgency of the situation, we believe Alternative D is the best alternative from the perspective of bison and bison conservation. An initial conservation goal of bison conservation should be to restore viable populations to numerous locations, each with at least 1,000 bison. Turner Enterprises is one of the only entities with the current capacity to support herds of such size. This plan will benefit bison conservation in two important ways: through the return of these bison and 25% of their progeny to FWP, making them available for translocation to public or tribal lands with no further quarantining necessary; and through use of the remaining progeny to help improve an existing and important genetically pure herd already owned by Turner Enterprises, the Castle Rock herd in New Mexico, and possibly to establish additional genetically pure herds on Turner Enterprise ranches. While that herd is private, it is nonetheless one of very few herds with no cattle gene introgression and is therefore important to bison conservation.

We oppose any alternative that would slaughter any of these important bison. As long as tribes, agencies, NGOs or others want to help advance bison conservation by housing these bison, slaughter is an inappropriate alternative for consideration.

The privatization of public wildlife resources is a great concern to Defenders of Wildlife. However, the doctrines of public ownership of wildlife and the public wildlife trust doctrine are not simply ownership doctrines but provide extremely broad authority to the public to manage wildlife in the public's best interest. We believe the public interest in bison conservation and in the individual bison at the quarantine facility is best served in this instance by translocation of 88 bison from the quarantine facility to Turner Enterprises. Turner Enterprises has a proven commitment to managing its lands for the benefit of species, and a strong track record of recovering habitats and species on its lands. The current reality is that most bison herds are fenced – literally or figuratively – and heavily managed through culling, hazing, hunting, selling, and other forms of management. The difference on the Turner property will be that they will be managed by a private enterprise. From the bison's perspective this difference is likely immaterial, especially since Turner Enterprises has a larger landbase than most public and tribal entities to restore and manage bison. The transfer of 75% of 88 bison's offspring to Turner Enterprises to increase the genetic diversity of the genetically pure Castle Rock herd, and the possible move toward management of genetically pure bison on all bison habitat on Turner Enterprise's many and massive ranches, is an important conservation development in our opinion.

We do, however, urge FWP to negotiate some changes to the proposal from Turner Enterprises. We urge FWP to seek greater clarity from Turner Enterprises on its plans for managing the genetically pure offspring after the five year quarantine research period is over. The commitment from Turner Enterprises to maintain the genetic integrity of these bison and their offspring over time – based on the expert opinion of bison geneticists – should be explicit and irrevocable. Further, we urge FWP

to seek commitments from Turner Enterprises to, over time, replace all existing bison on the Flying D Ranch of which the Green Ranch is a part with genetically pure bison. The public interest in the conservation and genetic value of these bison will remain long after the 5 year research period ends, justifying these continued commitments.

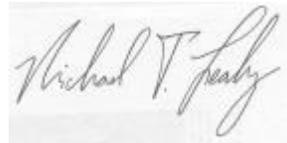
From the perspective of the individual bison in the small, increasingly cramped quarantine facility, the 12,000 acres provided by the Green Ranch will presumably be a welcome change. From the perspective of bison conservation, the return to FWP of all original bison plus 25% of the progeny for establishment of wild bison herds elsewhere, plus the potential to enhance and establish viable herds of genetically viable bison on the many ranches owned by Turner Enterprises, justifies FWP's Alternative D.

Thank you for this opportunity to comment.

Sincerely,



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