

Tris Hoffman  
Hebgen Lake Ranger District  
P.O Box 520  
West Yellowstone, MT 59758

November 14, 2001

Dear Ms. Hoffman:

Please accept these scoping comments on the proposal to reissue the Horse Butte grazing allotment on the Gallatin National Forest. Our organizations have expressed our concern about the future of Yellowstone's bison on numerous occasions over many years. We are concerned by the proposal to continue livestock grazing on Forest Service lands on Horse Butte, because such a decision would play a significant role in the survival and success of bison and other wildlife moving in and out Yellowstone National Park.

#### *Purpose and Need and Range of Alternatives*

The scoping notice describes the activity as a "proposal to continue livestock grazing on the Horse Butte allotment through re-issuance of a term grazing permit." The scoping notice then goes on to describe the importance of the "economic activity" of grazing at Horse Butte and its role since "the 1800s". However, the scoping notice fails to provide the public with information regarding bison use of the area for approximately 12,000 years and the economic information regarding the costs of bison management and benefits of livestock grazing on Horse Butte. The FEIS on Bison Management states that the Horse Butte allotment returns less than \$1000 to the Treasury each year, while management of bison and cattle on the west side of Yellowstone National Park costs approximately \$800,000. These costs and history must be presented to the public. Omission of this information puts the agency at risk of predetermining the outcome of the decision making process. A full range of alternatives must be considered, including a No Grazing Alternative. Other alternatives that should be analyzed include a Horse Grazing Only Alternative. A full range of alternatives will provide the public with complete information and the opportunity to weigh the costs and benefits of continued livestock grazing on these public lands.

#### Issues to Be Considered in Analysis of Alternatives

##### *Livestock Grazing on the Horse Butte Allotment Results in Harassment, Capture and Slaughter of the Nation's Wild, Free-Roaming Bison*

The Yellowstone bison herd is the last remnant of a once majestic species that spanned this continent, forming the foundation of ecosystems and human cultures. Today, only 3,200 wild, free-roaming bison are left in the Yellowstone herd. Those bison found haven in Yellowstone National Park and the forest lands encircling the park. The forests provide winter habitat that affords bison survival through the harsh winters on the Yellowstone plateau.

The presence of livestock on the Horse Butte allotment each summer season is a direct cause of harassment, capture and slaughter of the Yellowstone bison herd throughout the year, including the winter. During the harsh winter of 1996-97, for instance, 310 bison were shot along Yellowstone's west boundary as they tried to move onto Horse Butte and another 48 were sent to slaughter. The public was told that the slaughter was necessary so that bison would not transmit the disease

brucellosis to domestic cattle, though there has never been a documented case of cattle contracting the disease from wild bison. This capture and slaughter occurred on Gallatin National Forest property. The continuation of livestock grazing contradicts the agreement (in the ROD) to move towards temporal and spatial separation of bison and cattle in areas where a perceived conflict occurs.

*The Gallatin National Forest has a Clear Duty to Manage for Wildlife Species, including Bison*  
The Gallatin National Forest was created with the intent of serving as habitat for native wildlife. Under the National Forest Management Act, the Gallatin National Forest has a clear duty to provide suitable habitat for and ensure viable populations of all species present on the Forest. The viability duty applies to all native vertebrate species on the Forest (36 CFR 219.19). Bison clearly fall within this category. The Forest must identify its legal requirements for providing habitat and ensuring a viable population of bison.

The Gallatin is one of the premier wildlife forests in the country. Forest lands on the west side of Yellowstone on and around the Horse Butte allotment are frequented by grizzly bears, wolves, bald eagles, trumpeter swans and other rare and important species. The suite of species depending on these lands is negatively impacted by the presence of livestock grazing and the intensive management of bison resulting from livestock grazing. This intensive and invasive management includes but is not limited to: use of ATVs and snowmobiles to haze bison, construction and operation of the Horse Butte capture facility, helicopter overflights, gunfire noise used in hazing and slaughter operations, and vehicular and personnel traffic on and around the Horse Butte area. These direct and indirect impacts to wildlife caused by livestock grazing on Horse Butte are significant and not supportable under the laws governing management of wildlife on public forest lands.

*The Impacts of Livestock Grazing at Horse Butte on Threatened and Endangered Species Must Be Evaluated*

The Horse Butte allotment is within the range of grizzly bears, wolves and bald eagles. Several bald eagle nesting sites are within the allotment. Potential and current impacts to these species as a result of livestock grazing and associated management actions must be analyzed. For example, livestock grazing results in intensive management of bison. This intensive management includes the use of snowmobile by the Department of Livestock. DOL personnel drive off-trail in the area; tourists often follow the DOL trails and venture into areas utilized by wildlife species. The intensive and invasive management of bison also includes, but is not limited to: use of ATVs to haze bison, construction and operation of the Horse Butte capture facility, helicopter overflights, gunfire noise used in hazing and slaughter operations, and vehicular and personnel traffic on and around the Horse Butte area. The resulting direct and indirect impacts on threatened and endangered species must be analyzed as cost of grazing on this allotment.

*Economic Gains from the Horse Butte Allotment Are Far Outweighed by Taxpayer Costs for Bison Capture, Test and Slaughter*

In 1999, American taxpayers supported the government's expenditure of \$13 million to acquire lands north of Yellowstone to provide bison with forage to survive the winter. These lands were turned over to the Gallatin National Forest. A commitment was made to eliminate cattle grazing in those areas by 2002 to ensure that the government's money had the desired goal of securing a safe haven for Yellowstone's buffalo in winter. The lands on the west side of the park already belong

to the public and require no expensive purchase. The lands on the west side, however, need a similarly wise management decision like that rendered for north side Gallatin Forest Lands: a cessation of cattle grazing to provide a safe haven for bison in winter.

Although the lands west of Yellowstone needed by buffalo for winter forage are already owned by the American people, great costs are being levied on the American taxpayer. The livestock grazing allotment at Horse Butte returns less than \$1000 to the government annually. Yet the costs to manage bison due to the presence of livestock in these bison wintering areas exceeds \$800,000 annually. The cattle on Horse Butte are trucked in from Idaho each summer. The Forest Service should investigate an alternative allotment for the permittee which would allow the livestock operation to continue without costing America's taxpayers dearly or putting the last wild, free-roaming buffalo herd at risk.

*Livestock Grazing on Horse Butte Should Be Halted During the NEPA Process to Prevent Harm to the Yellowstone Bison Herd and Other Wildlife*

Pending analysis of environmental impacts of the Horse Butte allotment to bison and other wildlife species, livestock utilization of the allotment should be halted. The past dearth of environmental analysis and public input, coupled with the national significance of this area and the impacted species, warrant a moratorium of grazing until a full analysis and decision making process is complete.

*This Action is Nationally Significant and Warrants Broader Outreach for Comment*

Finally, we appreciate the agency's decision to conduct NEPA on this important decision. We recommend that broader dissemination of NEPA notice and documents occur. Over 65,000 citizens took the time to voice their concerns about the future of Yellowstone's bison herd during the inter-agency EIS process. Over two-thirds of those people implored the government to stop killing bison and to make publicly owned lands adjacent to Yellowstone National Park available to buffalo. Those people urged the government to enact a sensible, cost-effective plan that would separate cattle and bison. Sadly, those voices were not heeded. It is vital that those concerned Americans be notified of this most recent decision making process affecting Yellowstone's bison herd--a treasured national symbol.

*Other Issues*

From the information provided in the scoping notice, it is difficult, if not impossible, to determine whether or not additional relevant issues may exist. These include, but are not limited to, presence of endangered or threatened species such as grizzly bear, wolf, bald eagle and trumpeter swan. The present condition of the allotment may trigger additional issues or considerations, including forage availability, vegetative condition (including aspen), wetland and natural spring condition, water quality (point and non-point source issues or considerations), and cumulative effects.

Thank you for considering these comments and we look forward to our next opportunity to participate in this EIS process.

Sincerely,

Hope Sieck  
Greater Yellowstone Coalition

Caroline Kennedy  
Director of Special Projects  
Defenders of Wildlife

Franz Camenzind  
Executive Director  
Jackson Hole Conservation Alliance

Charles M. Clusen  
Director, National Parks Project  
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Glenn Hockett  
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Lloyd Dorsey  
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