

**GALLATIN WILDLIFE
ASSOCIATION**

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May 24, 2012

Arnie Dood
Montana Fish, Wildlife & Parks
adood@mt.gov

Subject: Montana Bison Restoration and Conservation Scoping Comments

Dear Arnie:

The Gallatin Wildlife Association (GWA) is a non-profit volunteer wildlife conservation organization representing hunters and anglers in Southwest Montana and elsewhere. Our mission is simply to protect habitat and conserve fish and wildlife. GWA supports sustainable management of fish and wildlife populations through fair chase public hunting and fishing opportunities that will ensure these traditions are passed on for future generations to enjoy. Please consider our support for wild bison restoration and conservation in Montana as a native free-ranging wildlife and big game species. We have also provided some ideas and concerns about how this should be done, which are outlined below.

Wild Bison are Valued Native Wildlife

Wild Bison are valued native wildlife and we appreciate the FWP beginning the process of ecological restoration and conservation in Montana of this forgotten big game species.

Ecological Status of Wild Bison in Montana

What is the current ecological status of wild bison in Montana? Do we currently have any free-ranging wild bison herds in Montana?

Tribal and National Public Interest

How will you involve the interested tribal and national publics in this important restoration and conservation effort in Montana? We suggest the most likely areas to be targeted for wild bison restoration and conservation will involve large chunks of national public lands and adjacent tribal lands. It is therefore important that FWP engage the national and tribal interested publics.

Genetics

Bison genetics issues likely exceed FWP expertise. We suggest the FWP secure additional research help to ensure a viable long term plan can be implemented in a timely and sustainable fashion. We are concerned that the entire bison genome has already been subjected to a devastating population reduction bottleneck. Cattle introgression is also a concern in numerous bison herds. As well, most North American bison populations remain small, isolated, behind fences and very few bison herds have been subjected to a full range of natural regulation forces. How do all these factors affect the wild bison genome and your planning into the future?

Additionally, most bison herds have been completely domesticated, commercialized and/or privatized, while many so called “conservation herds” have and continue to be managed like domestic livestock (behind fences, periodically and perpetually handled, selectively culled, moved through confined pastures, vaccinated, ear tagged, etc.). How does this impact the bison genome and this restoration effort?

Population Size, Viability and Maximum Carrying Capacity

While it may prove appropriate to start with a relatively small number of reintroduced bison, in the long term to be successful FWP should plan on establishing and managing numerous wild bison herds far in excess of Minimum Viable Population levels across a vast wild landscape of varied landownership. In other words, please anticipate managing wild bison like FWP manages elk, deer, antelope, bears, and other wildlife species. Bison herds should be allowed to grow, evolve, intermingle and adapt to a wild and vast environment. Since FWP must establish a “reasonable maximum carrying capacity” as mandated by MCA 87-1-216, we suggest FWP do this for a large, diverse and wild landscape with a long term population viability goal in mind (numerous herds exceeding MVP with habitat connectivity that allows natural genetic interchange).

Wild Bison Conservation/Public Hunting

Regulated public hunting is a proven, respectful and sustainable wildlife conservation method. It is also a job creator. Many of our members would cherish the opportunity to pursue a wild bison in a fair chase publicly managed hunt. Human hunting has shaped the evolution of bison, however unregulated shooting of bison led to their near complete demise. FWP is the proper agency to regulate public hunting. Please take a long term, respectful approach that ensures public hunting is a valued conservation practice for managing sustainable bison numbers.

Designated Areas

“Designated areas” for wild bison must be identified as mandated by MCA 87-1-216. Thus we suggest identifying landscapes that are substantially large and diverse in nature as well as land ownership; likely with a preponderance of national public land and/or tribal land. There are only a few landscapes that meet the criteria necessary to successfully restore and conserve a truly wild and viable bison population (made up of numerous herds that exceed MVP and are allowed to periodically intermingle). Please

consider reviewing in detail the suitability of the following proposed “Designated Areas” for wild bison reintroduction and/or restoration and conservation.*

1. The Northern Great Plains encompassing the Charles M. Russell and U.L. Bend National Wildlife Refuges, Upper Missouri Breaks National Monument, Fort Peck and Fort Belknap Indian Reservations and surrounding landscape, in particular BLM and State lands and authorized private lands.
2. All Custer National Forest lands from the Pryor Mountains east including the Crow and Northern Cheyenne Indian Reservations and the Custer National Forest lands east of Ashland and Birney west to the Powder River including adjacent BLM and State lands and authorized private lands.
3. The Greater Yellowstone Area in SW Montana including Yellowstone National Park and portions of the Gallatin National Forest and the Beaverhead National Forest, Red Rock Lakes National Wildlife Refuge, surrounding BLM and State lands and the various state-owned Wildlife Management Areas (Wall Creek, Gallatin, Dome Mountain, etc.) and authorized private lands.

*Wild bison should be authorized on all public lands. If wild bison are not welcome on certain public lands within any given authorized landscape or “designated area” a clear reason must be provided to the public. FWP must also make it clear which if any private lands are not authorized for bison use within any given landscape (MCA 87-1-216). Fencing may prove necessary to assist FWP with preventing bison from entering unauthorized private lands as mandated by MCA 87-1-216. Conflict areas or intolerant landowners should be fenced out, if necessary. It is not appropriate to fence wild bison or other wildlife in.

Disease

There is no such thing as an unexposed, “disease-free” mammal. The domestic animal industry cannot meet this standard and it is unreasonable to believe the wildlife conservation community can meet this standard.

Thank you for the opportunity to provide these comments. Please know that the Gallatin Wildlife Association strongly supports this public planning process and we remain confident that wild bison can and will be restored and conserved as valued native wildlife and a big game species in Montana.

Sincerely,

Glenn Hockett
Volunteer President, Gallatin Wildlife Association