

**GALLATIN WILDLIFE  
ASSOCIATION**

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May 29, 2013

Interagency Bison Management Planning Partners

**Subject:** Department of Livestock Proposal to Further Restrict Greater Yellowstone Bison Habitat in the Northern Range.

Dear IBMP Partners:

The Gallatin Wildlife Association (GWA) is a non-profit volunteer wildlife conservation organization representing hunters, anglers and other wildlife enthusiasts in Southwest Montana and across the country. 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 these comments regarding a recent proposal by the Department of Livestock to further restrict the movements and habitat use of native bison in southwest Montana, in particular on the Northern Range.

Our organization was very discouraged to hear there has been a proposal put forth by the DOL at the last IBMP meeting (Thursday, May 9, 2013) to further restrict the available habitat for bison on the Northern Range to Slip & Slide Creek south of the Dome Mountain area. We adamantly oppose this proposal.

Many of our members volunteered to serve and work with a diverse group of citizens - the Bison Citizens' Working Group for well over a year to craft consensus based recommendations. Those recommendations have been provided to the IBMP partners in writing and are attached with this letter. This DOL proposal to further restrict and confine bison to a smaller area on the Northern Range runs contrary to the principles discussed in the BCWG recommendations. For example, the Population Management Sub-Committee's Issue Statement reads:

“Successful population and risk management strategies can facilitate making additional suitable habitat available for bison.”

From their Guiding Principles:

“Bison can be an asset for Montana and other interests, such as Tribes, and an informed public is better able to see bison as an asset.”

And finally from their Recommendations:

“Modify the Interagency Bison Management Plan Zones 1, 2, and 3 with an eye to finding better habitat solutions particularly in light of changes that have occurred since zones were designated in 2000. Identify habitat that can alleviate population pressure, including available public and private lands, and potential habitat acquisition as well as potential funding sources.”

The Habitat Effectiveness/Habitat Expansion Sub-Committee Issue Statement and Rationale reads:

“The rationale for our habitat recommendations is based upon the fact that the current bison population does not have access to enough year-round habitat. Significant habitat, however, exists outside Yellowstone National Park which includes National Forest lands. We’d like to see bison have access to more of this habitat allowing for more fair-chase hunting as a management tool which is more desirable than the expenditure of taxpayer dollars for haze, capture, and slaughter practices. That said, we think that local public input (i.e. residents and private property owners) is critical to habitat expansion and should be given a high priority in the process. The habitat exists, win-win solutions to protect landowners exist, and we hope to see the winter and year-round habitat expanded for the bison population.”

From their Recommendations:

- “1. Identify public lands that could/should be open to bison year-round in accordance with state and federal law.
2. Systematically identify suitable, available habitat outside Yellowstone National Park in the Greater Yellowstone Area (i.e., Federal, State and Private lands)
3. Develop and implement strategies that manage bison as wildlife on those lands, specifically:
  - b. Gardiner Basin
    - i. By the end of 2012, interview and map landowners to identify where bison are welcome, unwelcome, which landowners are on the fence and what their reservations are.
    - ii. By the end of 2013, implement adequate fencing or acceptable alternatives.
    - iii. Following the interview process and implementation of fencing/alternative strategies, consider designating the Gardiner Basin year-round habitat using an adequate public process.

c. Beyond the Gardiner Basin

- i. Based on a minimum of two years of bison experience in the Gardiner Basin, and
- ii. Using adequate public process, consider allowing bison to roam on Dome Mountain Ranch, Dome Mountain Wildlife Management Area and surrounding lands with landowner concurrence.”

And from their Desired End Results:

- “i. Expanded habitat with private land-owner concerns addressed.
- ii. Habitat expansion and use modification that results in minimal use of management tools such as hazing, capture, slaughter, invasive procedures, etc.”

Rather than restrict the habitat available to bison on the Northern Range we suggest the IBMP partners expand the range available to bison, especially based on what was learned from bison movements in the winter of 2013. We suggest these changes be made based on the ecological and biological needs of bison, respect for public and private property rights, agency knowledge of existing important winter ranges and migration corridors for other Greater Yellowstone large ungulates using the area and safety concerns. As well, the existing Designated Surveillance Area, which encompasses a much larger landscape used by elk, is an effective risk management strategy, which promotes the vaccination and testing of livestock to ensure livestock remain brucellosis free.

In the winter of 2013 a lone bull bison was known to migrate into the remote Dailey Basin area, which is just north of the Dome Mountain – Red Mountain Divide. This area is a mix of private and public ownership, primarily the Dome Mountain Ranch, the Dome Mountain Wildlife Management Area and the Gallatin National Forest. All of these landowners provide habitat for a variety of Greater Yellowstone wildlife and they have either a responsibility or desire to provide habitat for Greater Yellowstone bison. There are no cattle in this area and it is well known to be a critical winter range for elk, mule deer and other Greater Yellowstone wildlife. It is remote, so remote that when the DOL decided to kill the lone bull bison that had migrated into this area to winter, they felt it was too far to pack the animal out and they left it to rot.

We believe this lone bull bison was showing us all the way to a conflict-free habitat solution. It had migrated to this area on its own instincts, likely following a migration corridor known by its ancestors. There are approximately 16,000 acres of wild lands in this area, east of the Yellowstone River and west of the Six Mile Creek Divide to the northern boundary of the Dome Mountain Wildlife Management Area. We also understand further north to the confluence of Six Mile Creek with the Yellowstone River, where private land begins to dominate the landscape, there are only 2 cattle owners in the area. We also understand the Montana Department of Fish, Wildlife & Parks already employs a seasonal late winter/early spring “herder” to keep Greater Yellowstone elk and

local cattle separate if necessary to effectively address issues related to potential brucellosis transmission from elk to cattle. This has proven to be a reasonable solution for elk, private landowners and the 2 local cattle owners in the area. We believe similar respect for bison as valued native wildlife in this area, while respecting private property rights/concerns and the 2 cattle owner's interests in the area will prove effective for all parties as well.

Increasing the amount of land available to bison can be accomplished while remaining responsive to landowner concerns, both pro and con bison. It is now clear that some very large private landowners such as the Dome Mountain Ranch (which owns no cattle) and small businesses such as the Yellowstone Basin Inn appreciate and value native bison. Furthermore, the opportunity to provide more space for bison in Montana increases and improves hunting opportunities on both public and private lands and better respects bison as a wild species. Thus, we suggest the IBMP partners revise their approach and abandon the "drop dead line" Zone 2 concept, which unreasonably burdens Montana agency partners with the need to confine native bison both in time and space.

Instead, we suggest a shift toward a "Primary Conservation Area" concept as used for Grizzly Bears. Tolerance for bison like grizzly bears will likely, but not surely decrease in areas of increased private land. Let landowner tolerance be your guide, within reason, as recommended by the Bison Citizens' Working Group. We suggest a primary conservation area that extends to the northern boundary of the Dome Mountain Wildlife Management Area east of the Yellowstone River and to the Point of Rocks Donahue Creek/Stoughten Creek divide west of the Yellowstone River makes good sense for a viable long term solution. Beyond this area bison tolerance will likely decrease due to increasing abundance of private lands and agricultural developments, but should not necessarily be considered a given.

We would appreciate a written response to this letter and we would welcome the opportunity to begin a meaningful dialog with the all the IBMP partners to hear their ideas and concerns about increased habitat opportunities for bison in Montana while respecting private property rights and addressing the concerns of local livestock owners. The use of a primary conservation area will allow transition from a difficult concept (Zone 2), one that we feel will has proven too restrictive and that will continue to lead to endless controversy and conflict, to a more flexible and respectful solution.

Sincerely,

Glenn Hockett  
Volunteer President, on behalf of the Gallatin Wildlife Association

Attachment: Bison Citizens' Working Group consensus recommendations