



Buffalo Field Campaign  
PO Box 957  
West Yellowstone, MT 59758  
(406) 646-0070 phone  
(406) 646-0071 fax  
[www.buffalofieldcampaign.org](http://www.buffalofieldcampaign.org)

Governor Steve Bullock  
Office of the Governor  
PO Box 200801  
Helena MT 59620-0801

June 12, 2015

Superintendent Daniel Wenk  
Yellowstone National Park  
Yellowstone Bison Management Plan EIS  
PO Box 168  
Yellowstone National Park, WY 82190

Dear Governor Steve Bullock and Superintendent Daniel Wenk,

Buffalo Field Campaign is requesting the state of Montana and Yellowstone National Park evaluate managing wild buffalo like wild elk on public lands in Montana as an alternative in the Bison Management Plan. The *Manage Wild Buffalo like Wild Elk in Montana* alternative supports buffalo's freedom to roam America's public lands.

The alternative would ensure wild buffalo are allowed to inhabit public lands and establish a population in Montana. Like wild elk, wild buffalo would be managed by hunting based on sustainable populations in available habitat in Montana.

The habitat to sustain a wild buffalo population exists on public lands in Montana. What remains missing is a commitment by Montana's Governor to allow wild buffalo to inhabit National Forests and other public lands beyond Yellowstone National Park.

As practiced by the state of Montana and Yellowstone National Park, adaptive management has been a dismal failure. Despite several changes to the plan, the framework continues to operate on faulty assumptions and outdated information. The public has roundly criticized adaptive management and an independent review by the U.S. Government Accountability Office found fundamental problems that persist to this day. We strongly encourage using the best available science to guide informed management decisions.

The *Manage Wild Buffalo like Wild Elk in Montana* alternative meets the mandate from the U.S. Congress to conserve and leave buffalo "unimpaired for the enjoyment of future generations."

The alternative adheres to National Park Service policies and directives requiring that “natural values, processes, systems, and values” be preserved. The alternative also fulfills Montana’s public trust responsibilities for “each generation as trustee of the environment for succeeding generations.”

It is long past time for the state of Montana and Yellowstone National Park to transition away from a destructive and costly management plan to a sustainable and respectful plan for wild buffalo.

The alternative to manage buffalo by hunting based on sustainable populations in available habitat in Montana is a viable alternative that fits the four corners of a sound wildlife management plan. But it requires that the state of Montana and Yellowstone National Park reject continued slaughter of buffalo.

Government slaughter of buffalo eliminates wildlife management of the migratory species. The government must reject slaughter as a bygone policy relic from the 1870s. Hunters do not want to be a management tool in the toolbox of another government slaughter plan. Subsistence hunting for hunters and their families must also mean subsistence for the wild species taken by managing habitat to sustain a wild buffalo population over the long-term.

The alternative proposes continuing the Designated Surveillance Area management of cattle in place of an Interagency Bison Management Plan.

Despite several incidents of Montana cattle testing positive for *Brucella abortus*, the Designated Surveillance Area has protected producers statewide. Several taxpayer-supported programs are in place to assist producers in managing cattle. Producers in the Designated Surveillance Area are compensated for testing, vaccination, and handling of cattle. In the vast Yellowstone ecosystem, managing cattle remains the most effective disease risk management approach. Ranchers statewide have saved \$5.5 to \$11.5 million annually since the Designated Surveillance Area went into effect in 2010. These benefits will continue to accrue for livestock producers under the alternative to *Manage Wild Buffalo like Wild Elk in Montana*.

The *Manage Wild Buffalo Like Wild Elk in Montana* alternative will also save millions of taxpayer dollars because it limits unnecessary government action by ending government capture of buffalo for slaughter, quarantine, hazing deadlines, population control experiments, and vaccination.

Montana and American taxpayers expect transparency and a public accounting for how our money is spent by the government. It should not require a report by the U.S. Government Accountability Office to arrive at an estimate of how much taxpayer money is being spent on the Interagency Bison Management Plan. Cost to taxpayers and cost effectiveness are issues that need to be disclosed in your evaluation. Buffalo Field Campaign requests the government publicly disclose management costs annually so the public has an opportunity to gauge the cost effectiveness of management actions.

As you know, Montanans strongly support restoring wild buffalo in the state, a purpose and need embodied in our alternative. More than three in four Montanans support restoring wild

buffalo on public lands. More than seven in ten want to see wild buffalo managed like wildlife not livestock. Just as many Montanans want management decisions to be made by biologists and scientists rather than politicians. The pro-wild buffalo sentiments of Montanans are also found locally in the very communities that make their livelihoods here.

The transition to a sustainable and respectful wildlife management plan aligns with the economic and social values of Yellowstone's gateway communities. Americans and people worldwide are entitled to see and experience the wild buffalo the state of Montana touts in its Office of Tourism advertisements. However, unless Montana changes its policy, the opportunity to experience seeing buffalo in their original habitat will remain restricted to Yellowstone National Park in the state of Wyoming.

The people of Montana and America deserve an honest and public evaluation of our alternative. Please evaluate managing wild buffalo like wild elk on public lands in Montana as an alternative in the Bison Management Plan.

Sincerely,



Michael S. Mease, President  
Buffalo Field Campaign



Daniel Brister, MS, Executive Director  
Buffalo Field Campaign