EMERGENCY RULE MAKING PETITION TO STOP THE BISON SLAUGHTER

You can sign on and download the emergency stop the Yellowstone bison slaughter petition online:
http://www.buffalofieldcampaign.org/stoptheslaughter.html

As decreed by an Act of the U.S. Congress, the mission of the U.S. National Park Service is to:

> "promote and regulate the use of the Federal areas known as national parks, monuments, and reservations ... by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."
>
> *National Park Service Organic Act* (16 U.S.C. §1 et seq.)

Under the Interagency Bison Management Plan, bison in Yellowstone National Park are subject to being forced from winter range habitat and trapped at Stephens Creek for shipment to slaughterhouses. Kim Kaiser photo

A diverse coalition of tribal, conservation, hunting, animal welfare and wildlife groups, an outfitting business, and concerned citizens from Montana and South Dakota, filed an emergency rule making petition April 10, 2008 with the U.S. Department of the Interior seeking to stop the National Park Service from slaughtering wild bison inhabiting Yellowstone National Park and adjoining lands on the Gallatin National Forest in Montana.

The coalition requested immediate measures be taken by the National Park Service to ensure bison's long-term survival and health including protecting a minimum of 2,000 bison in each distinct bison population. That number is considered a minimum for each population to retain genetic diversity over a 200 year time period (Gross and Wang 2005; Gross et al. 2006). Maintaining 2,000 bison in each distinct population would ensure that genetic diversity is conserved - allowing Yellowstone bison to naturally evolve and adapt to a changing environment, and retain important survival traits like natural migration and selection.

The petition presents scientific evidence of at least two genetically distinct bison populations inhabiting Yellowstone National Park: the Central range herd inhabiting Pelican Valley, Hayden Valley, and the Firehole region, and the Northern range herd inhabiting the Lamar Valley.

Petitioners argue and present evidence that the Interagency Bison Management Plan does not contain sufficient controls or conservation measures for Yellowstone's distinct bison populations. The interagency partners have also systematically failed to adapt to emerging bison science, research and changed circumstances that favor conservation of wild bison and their habitat.

The petition asked then Secretary of the Interior Dirk Kempthorne to publish an emergency rule prohibiting the National Park Service from killing or otherwise permanently removing bison from either population when the population is reduced to 2,000 or fewer bison. Northern range and Central range bison populations number fewer than this conservation threshold.

On May 19, 2008, Michael D. Snyder, the Regional Director for the National Park Service's Intermountain Region responded that the petition was not warranted as the plan was proceeding to Step 2 on the Royal Teton Ranch in the Gardiner Basin and that it was "important to allow these changes to take place, as well as any other adaptive management changes, before considering any emergency rulemaking."

Additionally, the Park Service noted that in the face of uncertainties about conserving Yellowstone bison genetics, the agency would present petitioners "analysis and argument at the next meeting of the IBMP partner agencies and recommend an assessment of how this recent science should be incorporated through the IBMP adaptive management framework."

While the agencies met over the summer and fall of 2008 to make operational changes they did not adapt any new science-based conservation threshold for the distinct bison populations subject to its plan. Furthermore, conditions for moving to Step 2 were met when the Church Universal & Triumphant removed all

cattle from their private lands in the fall of 2008, yet the agencies have not made operational changes to adapt this next step in the field.

Signatories to the emergency rule making petition: Animal Welfare Institute, Buffalo Field Campaign, GravelBar, Natural Resources Defense Council, American Buffalo Foundation, Western Watersheds Project, Seventh Generation Fund for Indigenous Development, Horse Butte Neighbors of Buffalo, Big Wild Adventures, Gallatin Wildlife Association, American Indian Law Alliance, The Humane Society of the United States, WildEarth Guardians, Ms. Karrie Taggart, Ms. barb abramo, Mr. George Nell, and Ms. Rosalie Little Thunder.

For additional information on the emergency rule making petition, contact: D.J. Schubert, Animal Welfare Institute, (609) 601-2875, dj@awionline.org or Darrell Geist, Buffalo Field Campaign, (406) 646-0070, z@wildrockies.org

Excerpt from the Emergency Rule Making Petition:

> "Within a species, genetic diversity provides the mechanism for evolutionary change and adaptation (Allendorf and Leary 1986, Meffe and Carroll 1994, Chambers 1998). A reduction in genetic diversity can cause a reduction in fitness, decreased growth, increased mortality, increased susceptibility to disease, and a reduction in the flexibility of individual animals to adapt to evolutionary changes (Ballou and Ralls 1982, Mitton and Grant 1984, Allendorf and Leary 1986, Berger and Cunningham 1994). Genetic diversity can be reduced as a product of hybridization (e.g., with cattle), inbreeding, founder effects, genetic drift, and as a consequence of domestication where purposeful selection will favor some morphological/behavioral/physiological traits over others ultimately leading to genomic extinction (Freese et al. 2007) of bison as a wildlife species.

In general, populations with a genetically effective population size of 50 to 500 were considered secure (Meffe and Carroll 1995). Gross et al. (2006) report that populations containing fewer than 500 breeding individuals are believed to be especially vulnerable to harmful consequences of inbreeding depression and other impacts that can be directly traced to the genetic composition of the populations (Frankham 1995, Keller and Waller 2002)."