

October 10, 2023

Sent via: <https://parkplanning.nps.gov/commentForm.cfm?documentID=130873>

Dear National Park Service Staff:

The following are comments from Wilderness Watch on the Draft Yellowstone Bison Management Plan. Wilderness Watch is a national wilderness conservation organization focused on the protection and proper stewardship of all units of the National Wilderness Preservation System, including those Wildernesses adjacent to Yellowstone National Park.

The Draft Bison Plan puts forth three alternatives:

- Alternative 1 would continue management under the existing Interagency Bison Management Plan, approved in 2000; maintain a population of 3,500 to 5,000 bison after calving; and would continue the capture-for-quarantine-and-relocation program and continue hunting-trapping by using culling and hunting outside the Park.
- Alternative 2 would manage the population of about 3,500 to 6,000 bison after calving with an emphasis on using the capture-for-quarantine-and-relocation to Tribal lands, and Tribal hunting outside the Park to regulate numbers.
- Alternative 3 would rely on natural selection, bison dispersal, and public and Tribal hunting in Montana as the primary tools to regulate the population, ranging from 3,500 to 7,000 after calving.

Only Alternative 3 moves bison management in the right direction. But it must be extensively strengthened by expanding the landscape where bison are allowed to inhabit outside of Yellowstone, ending the NPS's capture-for-slaughter program, eliminating the Beattie Gulch firing line slaughter just outside Park boundaries, requiring that any hunting outside the Park on federal public lands be managed by the federal agencies (not by the states), and removing all population limits.

Yellowstone buffalo are the last continuously wild, migratory buffalo left in the United States, but they are treated as livestock rather than wildlife—denied the ability to roam or inhabit their native territory on Wilderness or other public wildlands outside the Park.

Buffalo migration follows forage availability. Yellowstone sits on a high elevation plateau and winters can be extreme, with snow averaging six feet deep. As Ice Age mammals, buffalo are well equipped for extreme winters, but when the snow gets that deep, buffalo need to move to lower elevation habitat. This lower elevation habitat is often found outside of the Park, in Gardiner or West Yellowstone, Montana.

The Draft Bison Plan fails to fully involve the federal agencies that administer federal lands and Wilderness just outside Yellowstone—especially the U.S. Forest Service—and it allows way too

much influence from Montana's Department of Livestock, whose goal is to limit bison numbers and keep the animals confined to Yellowstone.

While Alternative 3 in the Draft Plan moves in the right direction, it must still be dramatically improved to fully protect Yellowstone bison in the long run. We strongly encourage the National Park Service to make the following improvements to Alternative 3:

- We support Alternative 3, but only if it can be extensively strengthened so that wild bison are managed more like elk and other wild ungulates, free to migrate as they need and their numbers allowed to fluctuate naturally, without an artificial population cap.
- Bison must be allowed to migrate and repopulate Wilderness areas and other federal public lands surrounding Yellowstone, and not just the very limited portions of the Absaroka-Beartooth and Lee Metcalf Wildernesses noted in the Draft EIS. The Bison Management Tolerance Zones must be dramatically expanded. The other federal land management agencies—especially the U.S. Forest Service—must be more involved in this plan and its implementation.
- If bison hunting is allowed on federal public lands in the Yellowstone ecosystem, the hunt should be administered by the federal government and not the states, given the states' intolerance of bison. The Park Service must end both its capture-for-slaughter program and the slaughter of bison from the firing line at Beattie Gulch and anywhere else.
- The maximum limit for the bison population in Alternative 3 (7,000 bison) must be eliminated. Just this year, Yellowstone's superintendent and bison biologist stated that the Park alone could sustain up to 10,000 to 11,000 bison. Let the available habitat in and surrounding Yellowstone, predation, and natural selection determine how large the bison population becomes, with no artificial limits. Bison must be allowed to flourish on Wilderness and other federal public lands.

Please keep us informed of next steps in this process.

Sincerely,

Kevin Proescholdt
Conservation Director