

Date

The Honorable Greg Gianforte
Governor of Montana
Office of the Governor
Montana State Capitol, Room 204
P.O. Box 200801
Helena, MT 59620-0801
governor@mt.gov

Re: State of Montana's comments on Yellowstone National Park's Draft EIS for a new Yellowstone Bison Management Plan.

Dear Governor Gianforte,

The undersigned coalition of Tribal governments, conservation organizations, and business interests is respectfully asking you to reconsider your current stance on the National Park Service's management of Yellowstone bison. The State of Montana's position – as reflected in the comments submitted to the Park Service in response to the Yellowstone Bison Management Plan Draft Environmental Impact Statement – does not represent the majority attitudes, opinions, and interests of Montanans regarding America's national mammal.

American Plains bison are an undeniable part of our nation's heritage; as the last truly wild remnants of the vast herds of bison that once roamed the continent, Yellowstone bison represent the nation's most culturally and ecologically significant bison herd.

To the undersigned Tribes, Yellowstone bison are a link to the millions of Plains bison that once supported the cultural, spiritual, and nutritional practices of countless Indigenous communities for millennia. The Tribes' access to Yellowstone bison is not only paramount for cultural reasons, but a protected treaty right that the State is at risk of impeding. These treaty rights include the establishment of common hunting grounds on open and unclaimed lands in Montana north and west of Yellowstone; lands that are currently held in tolerance areas the State of Montana is using as a bargaining chip in efforts to force a sweeping reduction of the Yellowstone bison population.

To the undersigned conservation groups, Yellowstone bison represent an ongoing conservation success story – a collaborative effort to bring bison back from the brink of extinction and see them restored more broadly across their native range. Bison are important ecosystem engineers. The North American landscape is less balanced in their absence. The State's position threatens not only to put an abrupt halt to bison conservation, but to dismantle the last two decades of progress – taking the Yellowstone bison population back to the diminished numbers of 20 years ago. This is regressive, short-sighted, and damaging to the long-term health of the State's economy and outdoor heritage.

To the myriad Montana businesses in gateway communities around Yellowstone, bison are an economic driver that draw millions of visitors to Yellowstone National Park each year, supporting a robust tourism economy and putting dollars into the pockets of hardworking Montanans. It is unclear which interests the State's position on Yellowstone bison are designed to further, but it is certainly not the interests of Montana businesses and the hardworking families who run them.

Together, we join 74 percent of Montanans who, in a May 2023 public opinion survey¹, were found to strongly prefer that bison in Montana be managed as wildlife and restored to select public lands across the state, as opposed to be managed as livestock and not expand their range. This majority view holds across political party affiliations and all other measured demographic indicators.

The State's position on Yellowstone bison is out of touch with the preferences of most Montanans.

We are disappointed by the State's threats to remove bison tolerance areas and the State's desire to see the Yellowstone bison herd cut in half. There is no credible or scientific basis for such a drastic reduction in the size of the Yellowstone bison population, and doing so would all but guarantee the elimination of Tribal and public hunting opportunities, would seriously impede efforts to transfer live bison to Tribes through the Bison Conservation Transfer Program, and does not support the Interagency Bison Management Plan goal of "maintaining a wild, free-ranging bison population" with habitat needs that extend beyond the park boundary.

The State's threat to eliminate well-established, well-managed tolerance areas to coerce the park to comply with the State's demands is shocking and disappointing. Removal of the tolerance areas would further impede Tribal access and would constitute a major step backward for bison conservation.

The State's claim that its own 2015 habitat expansion decision was "not intended to accommodate a bison population beyond that agreed to in the 2000 ROD" is false. The State's 2015 Decision Notice clearly states that "the opportunity for bison to use year-round habitat in Montana will not be specifically linked to population levels within YNP." Further, in the spring of 2016, when the IBMP partners agreed to adopt the State's decision as an adaptive management modification to the IBMP, the total bison population was estimated at 5,000 animals, not 3,000.

The undersigned entities see the development of a new Yellowstone Bison Management Plan as a timely opportunity to develop a contemporary plan that reflects new information and science, accounts for changed circumstances and regulations, and incorporates the significant progress made since the Interagency Bison Management Plan was finalized in 2000. While the undersigned entities naturally hold different opinions on the plan's specifics, we are united in the desire for a plan that protects the last 20 years of progress made in bison conservation and sets the stage for future adaptive management that centers the best available science and acknowledges the incomparable significance of wild bison to the American people.

Maintaining a wild herd of bison on appropriate public and Tribal lands is not at the expense of another of Montana's heritage industries, agriculture. We support a balanced plan that allows bison and working lands to coexist. And with zero documented cases of the transmission of brucellosis from bison to cattle, it's abundantly clear that coexistence is possible.

The draft alternatives provided by Yellowstone National Park represent a reasonable range of options. Please join your fellow Montanans who understand the cultural, economic, and ecological value of Yellowstone bison, and believe they can be managed in a way that supports the interests of a diverse range of stakeholders.

¹https://static1.squarespace.com/static/61d4a6c6ff4dab0a05294ccc/t/653c4246e3462c68a6389438/1698447943425/New+YNP+Bison+Management+Plan_GYC+Draft+EIS+Comments_FINAL.pdf; see pages 12-14.

Montana is a place like no other. We still have many of the iconic North American wildlife species other states have long since lost. Living alongside wild animals is not always easy, but it is our privilege to do so, and it is one of the many things that sets Montanans apart. Our proximity to places like Yellowstone means that the rest of the country looks to us as an example.

As the governor of Montana, it is your responsibility to safeguard iconic wildlife for all Americans.

Sincerely,

CC:

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