



Montana Fish, Wildlife & Parks

1400 South 19th Avenue
Bozeman, MT 59718-5496

Greetings,

Thank you for taking the time to attend the recent bison scoping meeting that was held in Helena. We estimate that approximately 60 individuals attended this meeting. Public scoping is an initial step in the development of a programmatic environmental impact statement that will examine the future of bison in Montana as wildlife. Attached you will find a compilation of all of the comments as they were recorded during the recent meeting in Helena. We have transcribed the comments that were submitted during the meeting exactly as they were recorded. There are a few instances where the handwriting was not clear and the comments reflect this. Please review the comments and let us know if there are additional comments you would like to submit. Fish, Wildlife, & Parks will be accepting public comments via regular mail, e-mail, or online through June 25th, 2012. The comments that were captured at each of the regional meetings and those submitted outside of the meetings will be available for review on the Fish, Wildlife & Parks website following the closure of the comment period.

We would like to thank you again for attending the recent meeting and hope that you will remain part of this process as Fish, Wildlife & Parks moves forward with the development of the programmatic environmental impact statement.

Sincerely,

Arnold Dood and Montana Fish, Wildlife, & Parks

To Submit Comments or Gain More Information

<i>FWP Website:</i> http://fwp.mt.gov/fishAndWildlife/ management/bison/future.html#scoping	<i>Written Comments:</i> MT FWP Bison Plan Scoping ATTN: Arnold Dood 1400 South 19 th Ave Bozeman, MT 59718	<i>E-mail Comments:</i> Bison_Management@ mt.gov
--	---	---

Helena Public Scoping Meeting May 17th, 2012

Issues and Concerns:

- Solid management plan.
- If can't be managed within YNP "wild" but are managing → why are we moving them somewhere else (like moving a prisoner to a new jail)
 - Moving out of park to find food
 - Efforts to put back in park is met with litigation
 - Landscape is not able to support bison in park
- If have a bad weather year how will that be handled
- Bison are different to herd/control so will need additional resources
- Assuming an alternative is developed:
 - genetics issues/concerns
 - fencing/or free ranging
 - or contained area for ecosystem restoration
 - w/ full range of species
- All of areas of potential restoration
 - Have elk been tested for brucellosis.
 - Consider elk to bison
 - also bison to elk
- What techniques are being proposed to keep them from plowing everywhere
- Bison go when they want & where
 - Wolves & grizzly also go when they want & where and they can be more or just as detrimental to livestock
- Traffic engineering
 - Limited places bison won't be an issue w/roads
 - What safeguards would need to be engineered to safeguard against
 - Ex. Highway crossing line near Polson and wildlife fencings – reduce # of animals hit and maintain migration paths
 - How much would highway mitigation structures cost?
 - And would it be a further assumption for taxpayer to assume?
 - Much comes from Fed funds
- I have some concern w/ public safety that is said to exist. The whole (illegible) of MT was designed- roads, cities, towns, (illegible) etc -- without the bison in mind – there needs to be more (illegible) on public safety and the physical comforts that could (illegible-- if we are not talking about fencing in the scoping document.
- How are we going to teach bison to respect fences?
- Breakdown fence – electric fence will not hold them
- Fences won't hold or it is very high end expensive
- Were all types of fences tested?
- There has to be fences. How will these fences affect other wildlife species? & How will necessary fences be paid for...FWP is already challenged financially, with the costs affect other programs (worry these costs will affect other programs).
- Understand fence – it's place in our society – what kind of a study had been down on that?

- Brucellosis is also on the bio-terrorists list.
- The perception of bison transmitting brucellosis, whether real or not, will decrease the amount received for livestock.
- What requirements will be used to monitor brucellosis other than the currently used field kits?
- How will FWP control the diseases issue especially since other wildlife is infected?
- Mainly brucellosis and the interaction between bison and wildlife and wildlife and cattle?
- Brucellosis infection will impact cattle industry since other states will not accept cattle or you may have to pay a fee
- Can buffalo contract the disease that wolves (lung worm?) spread to elk?
- If there is a vaccine why can't it be perfected
- Who will pay for vaccine research
- Domestic or wild – still catch the disease
- Bison least contaminated w/ brucellosis. – bison caused brucellosis. transmission record?
- Livestock industry (as well as anyone else) wants to make sure there is no chance/possibility of disease
- Concerted effort to eradicate brucellosis in all bison & cattle
- YNP should be held accountable for their mismanagement of wildlife. They are the last reservoir of brucellosis in the U.S. Why does Mont. FWP want to be a part of that?
- Bison need to go through the disease quarantine protocol -- I would be concerned about these bison contracting disease from cattle.
- A need to revisit (Dratch & Gogan, 2010). Make sure we get the best number. That number seems too high.
- How do you reconcile the fact that the Henry Mtn. herd has held up genetically (40-50 yrs.) Mt. obj. 400-500.
- Why is reducing the genetic diversity of a herd an issue
- What cause/reason in preserving genetics
- Need to breed in new genes to increase genetic health
- Why is there an issue in separating gene pools
- There are 500,000 bison in 10 US states right now – wild herds in AZ, Neb, Colo, ND, and MT. If you have to prove any genetic difference among the 500,000 bison – when compared to YNP bison – I want to see proof that there is any genetic difference – They have – no one has – yet to prove it
- Will hunting be used as a management tool
- We are a big country like the idea of restored landscape & the idea that I could hunt bison.
- Hunting is a necessity
- Is 1,000 the target number before hunting is allowed?
- Has to be setup so that hunters have to pay their way
 - a. FWP is shuffling \$ around anywhere to study snails, etc
 - b. To set up the hunting program + permits should be paying for management
- Is hunting going to be the primary (or only) management tool?
- Who gets to hunt (State money)
- If bison are hunted there aren't enough of them, so they should be restored
- What expanse of land will be reserved or set aside for bison. How do you determine how much land is need to support a certain population of bison...say a 1000 head.
- What will be the criteria for deciding where bison will be re-located?
- What is the foraging stability for any potential restoration sites
- Geographic analysis is important. Needs to include conflict minimization component.

- How will FWP handle if they over grazing
- What is the sustainable # you can have and is it anywhere near the 1,000 bison recommended
- # of Bison for a program
- Under wolf reintroduction.--population minimum establish
 - Bison.--push to have huntable population
 - what will the threshold be for this to happen
 - will the number be firm
- Has there really been a constitutional analysis done on relocate or reintroduction of bison in MT → property rights and our state sovereignty under the 10th Amendment? The concern is, at one point or another, the fed govt. will be involved in the management of reintroduction programs.
- Need to address more than just fence damage. There are more property damage issues.
- To me “free-roaming” places undo burden on private landowners
- Put property concerns at top of list. Zones or areas for restoration?
 - Bison on CMR – not an impact on folks in Miles City?
- If Bison are placed somewhere in MT there must be some kind of \$ compensation to landowners and neighboring livestock interests for losses they encounter due to disease, loss grazing and destroyed fences from the Bison.
- Elk stay off the ranches more whereas buffalo will mix in w/the cattle – elk more controllable
- It’s been noted, studied, and documented that wildlife follows livestock.
- Could the same thing that happened to domestic elk producers happen to B. producers
 - Shooting of domestic B. or elk on private game farms
- What if another Ted Turner comes in and wants to have a private herd
- We have domestic bison growers
 - problem of genetic diversity
 - want to maintain wildness
- How do we address if wild herd is established what would prevent a domestic producer from moving in and what effect would that have
- Is there good ecological fit?
- Bison do do damage to riparian damage
- Where you bring in bison you will bring in wolves. How will you mitigate that?
- Bison have no real natural predators – predators could be re-introduced where bison are reintroduced but wolves do not take down a significant # of bison (mainly old/sick)
- If not managed well how will impact environment
- Could natural selection be an option for managing bison?
- Natural selection – let go and see what happens
- It’s too important from an ecological post to leave bison where they are now.
- Riparian impact from livestock is constantly under pressure – public land grazing management. Riparian is all under the (illegible) of the federal government. The background doc only one study that bison-riparian. There needs to be more. I don’t think anyone in the ranching community buys that.
- What will happen to the wolf pop if we make free roaming bison in other parts of the state?
- What is positive of bringing bison back?
- Other issues – a thorough analysis of socio-economics is needed.
- Does cost of few bison justify destroying an industry w/a large tax base (ranching)

- Additional testing for diseases reduces profit margin
- People go to CMR to watch elk in Fall. People would also go places to watch bison
- Wouldn't want to see a bison walk into somebody's front yard or house or negatively impact a person livelihood
- Livestock industry is a \$2 B tax base I (illegible) Montana. FWP needs us more then they need the bison.
- Economic impact – there is a lot of analysis of other state animal health authorities sanctioning MT Livestock due to their perceived threat of disease transmission.
- What is the benefit of bring them back – especially since it could be damaging to cattle (gone R1?)
- If bison displace viable ag producer how will the production of product be replaced at a time of world population growth and the need for more food?
- When measuring the positive impact of hunting and tourism and recreation, it needs to be balance w/ impacts to road, open gate, bison and cattle in wrong pasture, weeds, erosion, etc.
- State of Nebraska has passed a law that deals directly w/ the DSA news in the State of MT. They are watching this whole bison issue.
- How are we going to bring current MT infrastructure & free roaming bison together in a way that will work. There are definitely challenges in this area.
- Agriculture is Montana's primary industry. Ag pays taxes and provide the landscapes for tourism and if bison puts them out of business you've lost two industries.
- Whose needs does FWP feel they are fulfilling by placing bison on the MT landscape?
- Who's going to benefit? Who's going to pay the cost? And, how do we ensure that "equation" is balanced?
- I know MT has unique wildlife, that people across the country are interested in...BUT the local community ability to sustain these efforts should take priority
- FWP thinks that people that live in the country do not know how to care for the land – but they do
- The public has an interest in (illegible) bison as public wildlife, but livestock growers are part of the public as well and should have a say in the decision -> we have a responsibility to maintain habitat in both private and public land.
- Private landowner steward a significant amount of wildlife habitat w/ a public expectation that we manage it in a responsible way. So, we have high expectation to graze responsibly on public land – and provide quality wildlife habitat.
- We shouldn't lose sight of the fact that private landowners maintain a landscape suitable for bison. Alt. to consider: How do we make private landowners winners in bison conservation (e.g. establish a partnership w/ landowner). Elk transplants in initially was a good example – 1950's) – Since that time landowners have been alienated – too many elk.
- How will it affect grazing leases already in place?
- What will it do to natural resource exploration and development?
- Will State/BLM/Forest Service pull AUMs to accommodate bison grazing?
- Concerned about range resources. We don't have plentiful resources for all animals out there. Concern about direct forage competition. Who will make carrying capacity decisions. And, does FWP have expertise to do this analysis.
- Montanan's should have 1st choice of usage of MT lands/licensing
- Bison may have an impact on public grazing and that might has a legit concern, but I don't think the livestock industry has a preferred right to public grazing.
- What will happen to species if not reintroduced into wild
- ESA listing of wild bison in MT

- almost guaranteed that any herd that is established will result in ESA lawsuit
- what will be the trigger for ESA listing
- ESA listing has hundreds of ramifications
 - water rights, property concerns
- If token bison are reintroduced they need a classification. Wild, conservation, managed – See no difference between a wild species and a managed species if you are controlling the population
- If this process is to define bison as either “wildlife” or “livestock”? At what point will Fed government come in on management planning process.
- At what point does a wild B. become domestic? When it gets shipped?
 - Matter of semantics
- The dual status of bison right now is a problem. I would like to see agreement out of that status.
- If to be successful and not controversial they should be managed more like livestock
- If classified as wildlife should be managed as wildlife. Is there another classification that would provide an alternative to allow hunting/shooting outside traditional seasons (i.e. varmints) Or something in between livestock + wildlife?
- Perhaps we need to define “free-roaming.” Important to develop a working definition for the purpose of this planning effort.
- Any effort to manage is met w/litigation
- How can FWP break laws (ex transport) that the rest of the public are accountable for
- Is the state looking to use Eminent Domain to acquire land to put the bison on?
- How do free-ranging bison and private herds go together? Domestic designation versus Game or Wild designation. Will they be more restricted?
- How this fits in w/ FWPs restoration of other wildlife in the state & state responsibilities
- Is there the possibility that litigation can be removed as a potential if the process moves forward – example having mitigation and arbitration for any conflicts that arise
 - Ex if hunting conflict it goes to mediator who does not have any skin in the game
- Want state mgmt
- How does MT manage bison when they are placed on sovereign land?
- Bison restoration has already here success = re: YNP =7 but its still not (illegible) because you still have a disease issue that hasn’t been resolved. Successful restoration in Moise – a hunt population already -with some restrictions.
- We already have successful bison restoration Why do we need more?
- Where are you going to get the bison. You won’t get them from Yellowstone NP until the agencies around the IBMP to incorporate quarantine.
- Where will they come from
- What is Utah’s policy if bison leave area? (Henry Mtn Area) Look at Policy already in place to see if it actually works.
- We need to study in detail Utah’s Henry Mtn. free-roaming bison working relationship between landowners, BLM, and the state.
- How much research has been done on containment or polls to see if people are willing to fund captivity
- Need to do a study w/a rancher who is paid to run bison and cattle to see what environmental impacts occurs, do have different forage requirements but forage occurs on some plots of land – how does it impact the # of animals you can have on specific land

- Compensation for rancher and removing liability ranches could occur (insurance for ranch and their feasibility to produce in the future)
- Since aren't equip w/GPS and open them up to hunting outside National Parks and natural predators
- Do equip bison w/GPS and if moving outside boundaries have way that people can move back in so they don't impact cattle
- GPS transmitters are costly who will pay for that
- Ways to develop funds for managing bison and for GPS– can test and see if works and go from there
- Good idea to do a study
 - put brucellosis positive bison positive in with domestic cattle
 - Seems to be a major issue
 - Some people believe transmission happens
 - Some don't
- I'd like to see a point-counter-point of the Heavy MT UT model. Its always held up as a great model, but it is not free from conflict. It's not the utopia it made out to be.
- If we have such a difficult time managing bison in Yellowstone NP, what makes us think we can do it in MT?
- No much faith in FWP in managing this (ex Shrimp dump in Flathead, wolf disease, lake trout, elk herds, MT sheep, FWP let a herd of tame goats mingle w/sheep → lost sheep) Lack of faith that it will be different than in past
 - Credibility blowing smoke
- FWP wants to play ranching role, but ranchers feel they can't
- If cannot manage YNP bison through hunting, selling, butchering, whatever we are going to do w/them once on public lands
 - Accountability
- FWP has not reimburse for calves lost from wolves – FWP has said a private entity would pay but that did not occur – Large hoops ranchers have to jump through to be compensated – FWP staff has lied in the past
- Why does FWP want to manage YNP so badly -- Where there also so much tolerance migrating their elk herds -- DSA areas are getting larger rather than smaller. They have people management predators -- gain control of wolves a prime example.
- There is a strained relationship between FWP & landowners already. Will bison conservation further strain this relationship? Is there a need to improve this relationship first.
- Sometimes FWP loses or changes information or comments that come in
- FWP scoping posters are full of misinformation and the ranchers do not have to funds to refute
- When you are talking management it is important that city count official and local citizens be part of the management process
- Why do we need to move...them (bison) & who is responsible. Where are lines drawn between agencies, tribal entities, etc.
- Why do we feel a need to restore bison in Montana? Is their a reason to do this. I see no reason stated for doing this.
- Why are we two years into the process and just now involving the public?
- The has to be a management solution somewhere, the ranching community and the rest in MT have to work together – to get over this in pass of finding a place for bison.
- Are all of the questions asked during previous public meetings (i.e. Spotted Dog) still part of the process?
- Has to be some way to find happy medium

- FWP needs to have a dedicated system to let public know exactly what we are doing. Press release needs to be released as FWP wrote it instead of through media
- Impressed w/ comprehensive list of issue in all the materials provided to date. More details will surface with these meetings.
- Scoping materials to date do NOT establish purpose and need. FWP does not have mandate to establish a huntable pop. of bison or do genetic conservation. What the tie in to the CFWCS
- FWP needs to make sure it has \$ ahead of time and need to make sure bison are protected
- Is the public's opinion (scoping comments) going to count when it comes to the final decision? From Public Comments there needs to be a reporting in the paper the number positive and the number negative comments. Where the comments come from needs to be included.
- The difficult issues in this EIS will not be the biological issues...but the social and economic issues. Concern FWP does not have the adequate expertise to do a thorough analysis of those issues.
- Potential Alternatives at the meeting are NOT consistent with programmatic review. It takes supplemental document to release bison.
- Recognize FWP's mandate to conserve bison, but the reality of bison mgt. make it seen more like a pipe dream..& it will be costly.
- Is the do nothing option still on the table?
- Can the director be removed from the process – Should be a public process the whole way
- Why does director have final say to the plan (supreme overlord)
- Any changes should go through a public process
- One person especially public employee for people should not be able to make a decision that goes against the public's wishes
- Will counties have seat at the table
 - in shaping alternative
- Is this part of the Treasured Landscape plan by the Federal Gov't?
- What & how are the federal agencies going to be involved
 - a. In almost area there is fed. land to be considered
- The Feds need to stay the hell out of the way!
 - a. Amen!
- What does Canada think about this? Will bison be kept from going North? Same with east→North Dakota.
- FWP HAS to get the Federal partners involved. The only place you will be able to have any bison is on public land and FWP don't have the amount of public land needed for bison.
- FWP also need to get the treaty rights holders involved as well.
- A need to further scope out tribal treaty rights. What do the entail?...to see what the impacts might be -> on the rest of the hunting public. This needs to be spelled out.
- Res will not share hunting rights – and FWP paid to ship up there
- Never alive when free-ranging buffalo using religious beliefs to promote which is questionable as to whether right or wrong. People on res have a diff view of life. Reports of horses being left to starve on res.
 - Tribal interests are not going to be responsible for caring for bison.
- If moved absolutely do not want Americans/taxpayers to move to any tribe but the Pondera-Kootenai (Moise) tribe since they have proven management techniques in conjunction w/FWP
- Lawsuits here preventing hunting outside YNP

- Whose \$ shipped bison to Fort Peck?
- Transfer of bison to Ted Turner
 - will he benefit from the transfer
- What about APR
 - -are those bison tested
- How much is it going to cost per animal and where will FWP get the funding?
- Need to present to taxpayers what it will cost – need to present what each alternative will cost per year and how it will impact taxes
- Funding – new effort, new mandate
 - if this is a new effort something else will suffer
 - don't want sportsman to pay if they don't support – nor ag communities if they don't support
- Tourism?
- Adopt a Bison – get environmental groups to 'pony up.'
- Money generated from tags?
 - Budget breakdown of management program vs. Income generated
- Why are bison a problem now?
- My biggest concern is the (illegible) the stockman concern – we just went through this the crap with wolves – It's another ranger war. There is a lot of (illegible) on this wildlife issue.

Alternatives:

- Don't see a need for bison conservation. Conflict occurs where they already exist. Don't need more conflict.
- Reasonably managed free roaming herd – have constraints
- Geographical special management area--Don't recreate what has happened outside YNP.
- Alt: What's the opportunity to achieve bison conservation objectives using private versus public bison?
- Hell no! we don't want them.
 - a. Amen!
- What restrictions will be put on how many places bison will be put or will there be a cap on (ex. CMR, Reservations, etc) locations
- Do absolutely no moving of buffalo and manage them at the point of the problem which is YNP
 - a. if come out should be in someone's freezer
- Managed in captive reserves so they do not become an endangered species
- Fence CMR for free ranging
- Not that don't want bison but want them in reserves where they can be cared for properly
 - Romanticism of it vs. reality – should we bring breeding into your yard
- Alt focus on bison restoration on tribal lands by tribal entities
 - How does this meet concerns of all
 - bison that gets out
 - who is responsible
- Alt state program to replace domestic genetic stock w/ wild stock
 - -producers could still make money while maintaining genetic dir of wild bison