

March 13, 2015

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

Superintendent Dan Wenk
Yellowstone National Park
PO Box 168
Yellowstone National Park, WY 82190-0168

Dear Governor Bullock and Superintendent Wenk,

We thank you for moving forward with the process of developing a new conservation plan for the iconic and irreplaceable population of wild bison that inhabits Yellowstone National Park and the surrounding area in Montana. The Interagency Bison Management Plan (IBMP) was finalized in 2000, and, today, fourteen years later, we have new science, new regulations, many management lessons, and some fundamental on-the-ground changes that make the original IBMP outdated. As you have recognized, a new conservation plan needs to be put in place to guide bison conservation, education, and management into the next decade. Let us build on what we have learned over the past decade-and-a-half to create a new plan that benefits wild bison and all stakeholders.

We represent conservation, hunting, and wildlife advocacy organizations that have been working to ensure the conservation of bison in the Greater Yellowstone Ecosystem for many years. We – and the millions of members and activists that we represent – care greatly about the wild bison population found in and around Yellowstone, and we write to offer some guiding principles that we agree should serve as the foundation for the development of a new bison conservation plan.

The new management plan should reflect a fundamental change in the way we perceive and manage the Yellowstone bison population. We have outlined eight principles for the new plan.

- **Reflect new goals.** The primary goals of a new conservation plan should be to:
 - Conserve Greater Yellowstone bison and manage them as wildlife; and
 - Provide for expanded year-round access to habitat for bison outside of Yellowstone National Park.
- **Manage the risk of Brucellosis transmission to livestock:** The new plan should focus on *managing the risk* of brucellosis transmission from wild bison to domestic livestock, not on disease suppression. Managing this risk should be driven by real conflicts as they arise, with livestock that are on the landscape in Montana.
- **Use the best available science:** The new plan should be rooted in, and constantly updated with, the best available science and data as well as our new experiences and

lessons learned managing bison. This includes committing to use only scientifically valid solutions and the continued application of adaptive management to decision-making.

- **Expand habitat with year-round access for bison in Montana:** The new plan should include a focus on Montana's responsibility to manage bison as wildlife outside of Yellowstone National Park. Providing for expanded habitat with year-round access for bison in Montana is essential for this plan to succeed. Social tolerance, experience, real risks, and updated science – not fixed arbitrary boundaries – should determine where bison go. Bison should be welcome on public lands outside of the Park. The plan should address appropriate intervention to reduce conflict, including managing the risk of disease transmission to livestock, damage to personal property, or other public safety issues. The level of legitimate conflict and resources needed to manage such conflict should drive decisions regarding the level of management response needed.
- **Clarify management roles and responsibilities for each agency:** The new plan should lay out clear, delineated roles and bison conservation and management responsibilities for Yellowstone National Park and the State of Montana, with a coordination mechanism in place to ensure protection of the genetic integrity and ecological health of the Yellowstone bison population.
- **Develop appropriate population ranges for Yellowstone bison that are scientifically based.** Appropriate thresholds for the entire population or subpopulations of the Yellowstone herd and corresponding management actions should be based upon the best available science and established to ensure that scientifically justified bison population numbers are maintained in the event of seasonal mass exoduses from the Park. As with other big game populations, bison that temporarily leave the Park or are resident in Montana outside of the Park should be managed based on biological and social factors, while maintaining the desired overall population range.
- **Manage in response to large episodic migrations, not arbitrary population targets.** Large episodic migrations of bison – specifically, the potential conflicts and opportunities they create – should drive management response, not arbitrary temporal or numeric criteria. Shipping bison to slaughter presents undesirable social, economic and ecological costs. The following tools are alternative ways to manage these migrations over shipping bison to slaughter:
 - Allow bison in areas identified as being available for bison use, especially public lands, including habitats not currently being fully utilized (for example, the Upper Gallatin);
 - Tribal and public hunting in Montana; and
 - Appropriate quarantine and translocation to landscapes outside Greater Yellowstone for conservation purposes, if justified economically and scientifically.
- **Provide for adaptive management:** The new conservation plan should provide for a clear process of adaptive management and decision-making based on changes in social tolerance, land uses, regulatory changes, new science, habitat changes, etc.

Bison are valued native wildlife and recognized for their integral role in the Greater Yellowstone Ecosystem. The development of a new conservation plan offers the opportunity to improve, update and shift the management of Yellowstone bison and reduce the annual cycle of controversy and conflict that has characterized the public debate regarding bison management for too long. The new bison plan should be rooted in science, reflect the changes that have occurred in the past decade, incorporate our knowledge and experience managing bison, and chart a new course for bison conservation and management that is good for bison, good for Yellowstone National Park, good for the State of Montana, and good for all of the stakeholders involved.

We look forward to continuing to work with you and actively engaging in the development of the new bison conservation and management plan.

Sincerely,

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