Subject: Comments for wild bison reintroduction hearing
Date: Thursday, May 24, 2012 12:05 AM
From: "James Horsley" <jahorsley@yahoo.com>
To: adood@mt.gov

Dear Arnie Dood, Montana Fish, Wildlife and Parks:

Montana Fish, Wildlife and Parks is currently evaluating the possibility of establishing a population of wild, free-ranging bison on public lands within Montana. Public hearings are now being held for this purpose throughout the state. I am submitting the following questions and comments for incorporation in the record of these hearings.

According to the FWP website, “Based on the experience of free-ranging programs within other regions, bison and cattle can coexist on the landscape."

However, the FWP also states that “only bison that are certified as free of reportable diseases of concern would be considered for a potential reintroduction program” and “attention would be paid to the disease history of the source herd.” One of the diseases is brucellosis. These statements together make no sense for the following reasons:

1. Based on the experience of a free-ranging program for wild bison in Montana, the coexistence of bison and cattle has been a failure. Presently, bison are not allowed to migrate across the boundaries of Yellowstone National Park into Montana by a coalition of five government agencies under the Interagency Bison Management Plan (IBMP), namely, FWP itself, the Montana Department of Livestock, the Animal and Plant Health Inspection Service (APHIS), the National Park Service and the Forest Service, due to the fear of spreading brucellosis from bison to cattle.

Question: Will the reintroduced bison be allowed to migrate and roam at will, or will they be restricted by fences or lethal control? If so, how is this “free-ranging”?

2. Since bison with brucellosis will not be considered for reintroduction and since particular attention will be paid to source herds with this disease, does that automatically exclude the wild bison of YNP?

3. If so, how will the reintroduced free-ranging bison of Montana be kept separate from the already-existing wild bison herd in YNP? Would this be accomplished by fencing YNP or by lethal control or hazing of any of the reintroduced bison attempting to enter the park?

4. Where will these wild bison come from? The only wild, unfenced herds in the nation are at Yellowstone National Park. Bison that are part of a conservancy herd are not necessarily wild, but merely not being used for commercial use.

It makes no sense to say that wild bison and cattle can coexist in Montana because they do in other regions, when Montana itself will not allow wild bison to enter the state. Up

to 1,600 wild bison that inhabit Yellowstone National Park are killed annually by the agencies taking part in the IBMP, forcing this national icon into an extinction vortex.

They are killed as they approach the boundaries of the park in their annual migration into Montana to escape harsh winter conditions, heading to such places as the Gardiner basin, where there is less snow, more forage and where, if they escape the killing fields, they calve in the spring.

These bison--the last of the last wild bison in America, the last bison that still migrate and have not been extirpated, the last unfenced herd, descendants of the survivors of the decimation in the late 1800s by European settlers that claimed 30 million buffalo on the plains--these are the bison targeted by the agencies at a cost to taxpayers of $3 million a year.

Specifically, why are they doing this? According to APHIS the reason is fear that the wild bison will mingle with cattle grazing immediately outside the park (on public land with grazing fees a tenth of private fees) and transmit the disease brucellosis to cattle, putting the state's brucellosis-free status at risk and thereby undermining the profits of the cattle industry.

However, no one really knows how many of these bison have the disease and no bison have ever transmitted brucellosis to cattle in the wild. None. Only under laboratory conditions has the disease been forced to jump the "species barrier" and infect cattle, specifically, pregnant heifers crowded into pens with bison that had been artificially infected with the disease by injection of massive doses of the bacteria.

What APHIS does not tell the public is that when other animals, such as elk and coyotes, were experimentally penned with cattle under similar conditions, the disease brucellosis was also transmitted to cattle. But are these species prohibited from crossing park borders because of those studies? Of course not.

Nevertheless, all bison attempting to migrate across the park's border, especially those that test positive for Brucella abortus, are slaughtered, even though a positive test only means that the bison contracted the disease in the past, but very likely are now simply immune, not diseased.

APHIS and the other agencies say that testing whether the animals actually have the disease would be too expensive. Whole sub-herds are often eliminated in a single year, against the recommendations of some of the very agencies participating in the bison management plan.

In a report published by the National Park Service on a 2010 bison conservation genetics workshop, the participants made the following recommendation: "Based on well-established genetic population theory, fluctuations in population size increase the rate of genetic loss. Any necessary population reductions should be small and frequent to create minor adjustments as opposed to large and infrequent adjustments."

APHIS sums up its position by saying "The goal of the bison management plan is to maintain a wild, free-ranging bison population while minimizing the risk of transmitting brucellosis from bison to domestic cattle on public and private lands in Montana adjacent to YNP."

It says that brucellosis can be eradicated in Yellowstone because "Similar eradication efforts have been successful in other parks, including Wind Cave National Park and Custer State Park in South Dakota and Wichita Mountain Wildlife Refuge in Oklahoma."

Brucellosis is controlled in cattle by spatial separation from diseased animals through fencing. Yellowstone park is not fenced. The three parks cited by APHIS, however, are fenced. APHIS is lying to the public when it says it can eliminate brucellosis in Yellowstone using the same brucellosis-control methods employed in the other parks. The only way it could do this is by fencing Yellowstone, making it a zoo.

In effect, that is just what the agencies are trying to do at Yellowstone, but only for bison. They have established a capture facility near Stephens Creek just inside the park near the northern entrance directly on the migratory route they would use to leave YNP. As the bison descend from higher elevations in the winter, government agents are waiting on horseback, and in helicopters and ATVs, to drive them into a line of fencing that funnels them into the facility.

Once there, the bison are tested, loaded into trucks and shipped for slaughter. Ironically, the first time most of the bison cross the park boundary is in a truck shipping them to the slaughterhouse, for most are cut off and captured before they can leave. This violates the act that created the park, which prohibits the "capture or destruction" of its wildlife.

Hundreds of people objected in writing to the lethal control program of bison when the plan was proposed over ten years ago. However, the governmental agencies in a report on its management plan had this to say in its defense:

"Commentors are correct that available evidence indicates the risk of transmission under natural field conditions is extremely low. However, because transmission between bison and cattle has occurred under experimental conditions and on ranches with privately owned bison and cattle, the risk of transmission is not zero."

We are about to lose a national, as well as an international treasure over a risk that is "extremely low" but "not zero."

The World Organization for Animal Health--established to fight animal diseases at a global level while at the same time preventing countries from setting up unjustified sanitary barriers--said that its standards were "developed on the basis of a highly meticulous risk analysis but taking into account that zero risk does not exist."

A goal that does not exist is one that cannot be attained. What this means is that by establishing this unreachable goal, the agencies, in particular APHIS and the Montana Department of Livestock, have merely created an excuse and a cover to continue what they want to do--kill and eliminate all migrating bison in Yellowstone National Park.

The US Government Accountability Office, in a 2008 report critical of this bison management plan, was being polite when it said that the plan "contains no clearly defined, measurable objectives as to how these goals will be achieved, and the partner agencies have no common view of the objectives."

These governmental agencies are defrauding the public of one of the most significant links to the wild heritage of America, a heritage that dates back to the Pleistocene and the era of megafauna. The Yellowstone bison are descendants of the same bison that wandered into the park region 10,000 years ago over the Bering land bridge and have continuously lived there.

Yet it is this very instinct, the instinct to migrate, that is being systematically removed from the genetics of the herd by killing in droves bison that try to leave the park. Because of these governmental actions, the bison that do survive are those that do not migrate. When a severe winter hits, the probability continues to mount that the entire herd, now without the survival instinct to migrate, will not leave, but perish from starvation and sub-zero temperatures within the very park established to protect it.

What is the solution? These agencies should disband and cattle-free zones, "cordon sanitaires," should be established around the Greater Yellowstone Ecosystem, one of the last relatively intact ecosystems in North America. The zones should include the wild bison's migratory corridors, as well as the grazing and calving grounds traditionally and historically used by them just outside the YNP, such as Gardiner basin north of the park and the Hebgen Lake region west of the park.

It would be exponentially more fiscally sound to do this, because the $3 million annual governmental expenditure is used to keep bison from coming into contact with a mere 2,000 head of cattle grazing just outside the park in the GYE. This is at a taxpayers' cost of about $1,500 a head, enabling stock growers, in good years, to make a profit of $50 a head or, in bad years, to use as a tax write-off.

Future generations may marvel at this stupidity, but by then, it may be too late to get back Yellowstone's wild bison. Extinct, they will be gone forever.

# # #

James Horsley, 3431 15th Ave. S., Fargo, North Dakota 58103, is the author of a petition submitted to the U.S. Fish and Wildlife Service February 11, 1999, to list the Yellowstone National Park bison herd as threatened or endangered under the Endangered Species Act. In a 90-day finding, the FWS concluded August 15, 2007 that the YNP bison herd satisfied the two essential requirements to be listed as either endangered or

threatened, that is, it was both “discrete” and “significant.” However, it concluded that the petition did not provide substantial information to indicate listing may be warranted.

Horsley is the publisher of “The Buffalo People” at http://www.buffalopeople.org, which provides relevant information on this topic.

For more information email Horsley at jahorsley@yahoo.com or phone 701-237-9964.