



BUFFALO FIELD CAMPAIGN

June 25, 2024

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Create an Environmentally Preferable Alternative for Yellowstone National Park's Bison Management Plan

Dear Regional Director Kate Hammond and Superintendent Cam Sholly,

Buffalo Field Campaign encourages you to create an environmentally preferable alternative for Yellowstone National Park's long-term management plan that best preserves wild buffalo herds and the Yellowstone ecosystem.

An environmentally preferable alternative would comply with National Park Service policies preserving the "natural abundance, diversity, and genetic and ecological integrity" of Yellowstone's buffalo herds "minimally influenced" by humans.

Much more must be done to protect the characteristics and traits which make Yellowstone's wild buffalo herds unique and cherished around the world.

We recall the wisdom of the late wildlife biologist James Bailey PhD who warned intensive management is weakening natural selection of the "irreplaceable wildness of Yellowstone bison."

That irreplaceable wildness is injured every time Yellowstone National Park traps, quarantines, slaughters, and harasses buffalo from habitat in government hazing operations. It is troubling to see all of these intensive artificial selection processes – common to all alternatives– set against the wild spirit of the only buffalo in our country to continuously roam their indigenous range.

"Protecting the Last Wild Bison"

Buffalo Field Campaign is also troubled by the reported changes in Yellowstone buffalo's migratory patterns and population structure. It is equally troubling to see no examination in your analysis of Yellowstone National Park's management in bringing about these changes.

Buffalo have strong social bonds and form new ones. Is it so difficult to understand that in repeatedly trapping buffalo from the Northern and Central herds and releasing the cohorts from captivity, Yellowstone National Park likely played a role in changing migratory patterns and "breaking down" genetically distinct subpopulations?

Is it too much to examine how conducting over 600 government hazing operations against Yellowstone's buffalo herds on their range and habitat likely played a role too? Those coercive hazing operations directed at buffalo only record a brief period from 2009 to 2021, according to Geremia's 2022 report to the Superintendent.

Furthermore, the evidence of these changes in the constitution of Yellowstone's population has not been published (Stroupe, D. and Derr. Submitted; Stroupe et al. Submitted.) and is not available for the public to review and comment on.

Contrary to the one-sided claim in your analysis, the genetic erosion of distinct herds that occurred under Yellowstone National Park management may cause an overall loss in genetic variation—the differences allowing Yellowstone buffalo to adapt to and survive future changes in the ecosystem. That's not our opinion, that's the science Yellowstone National Park has resisted acknowledging since it was published by Halbert and her fellow scientists in 2012.

There seems to be a pattern of discarding evidence if it does not conform to Yellowstone National Park's plan or fit manager's perspective.

We urge courage and prudence in your decision. The elements of an environmentally preferable alternative, one that causes the least damage to and best preserves wild buffalo herds and the Yellowstone ecosystem, would include:

- Managing wild buffalo like wild elk. Disease management is a hypocritical failure in the State of Montana and Yellowstone National Park. It is also a real threat to wild buffalo for the foreseeable future.
- Ceasing costly and wasteful government management actions. There is no transparency in how Yellowstone National Park intends to avoid harm by minimizing costly management actions targeting wild buffalo. Yellowstone National Park is on course to spend millions of dollars over the life of its' plan without any clear benefit in retaining wild buffalo throughout the ecosystem.
- Getting out of the business of harassing, trapping, domesticating, and slaughtering wild buffalo, which suppresses the herds, and impedes herd migration to National Forest

habitat. Think and act with the entire Yellowstone ecosystem and future generations in mind.

- Safeguarding genetic diversity by conserving at least 2,000 to 3,000 adult buffalo in each herd. More must be done for the Central herd whose numbers have been perilously low since 2008. Much more.
- Independently studying genetic variation and herd integrity. How did management factor in “breaking down” Yellowstone’s population structure from “genetically distinct bison subpopulations” to “one interbreeding population”? Fund independent scientists with a directive to take a critical hard look at all factors threatening the viability, uniqueness, and distinction of Yellowstone’s herds.
- Implementing projects with the Custer Gallatin National Forest and American Indian Tribes to restore connectivity to habitat, and respect buffalo’s freedom to roam National public trust lands. Think and act with the entire Yellowstone ecosystem and future generations in mind.
- Building infrastructure for wildlife safe passages. There were almost 100 reported accidents involving buffalo and vehicles from 2009 to 2021 in Montana and Yellowstone National Park. We need your leverage and leadership in securing funding. Yellowstone National Park can play a positive role in getting Congress to open the purse strings.

Sincerely,

A handwritten signature in blue ink that reads "James L. Holt, Sr." with a stylized, cursive script.

James L. Holt, Sr., Executive Director

A handwritten signature in black ink that reads "Darrell Geist" in a cursive script.

Darrell Geist, habitat coordinator