



January 10, 2010

Montana Fish, Wildlife and Parks Commission
1420 E. Sixth Avenue
Helena, MT 59601

Dear Sir or Madam,

The Helena Hunters and Anglers Association takes a position in strong opposition to the proposal to move bison on to the Turner Ranch in exchange for the calves these bison will produce while there. Our opposition is based on two basic principles associated with wildlife restoration and conservation in this country. The first is that wildlife is a public resource managed by the state as a public trust and in the public interest. The second is that this entire process of bison quarantine, testing and distribution has degraded into a blatant deception and a series of broken promises.

For well over a century and a half, American courts have been deciding the wildlife in this country belongs to the public and is to be managed as a public trust. That fact alone should preclude the trading of bison originating in Yellowstone National Park to a private party that commercially sells both 'canned buffalo hunts' and engages in other marketing ventures. These are not the state's bison to be distributed to private commercial interests; they are the people's wildlife to be managed as a public trust.

Members of our club have been both personally and professionally associated with this public resource for a considerable length of time. We are familiar with the various agreements, promises and commitments made by the government associated with the quarantine and testing of these animals. For example, in the environmental assessments and decision documents, including the "Bison Quarantine Feasibility Study Q and A", it is repeated over and over that these bison are free ranging wildlife and are under the stewardship responsibility of the Montana Department of Fish, Wildlife and Parks (MDFWP) and are not for private ownership nor are they to be used for commercial purposes. Some specific quotes include:

- *Bison that complete the quarantine study may not be sold or used for commercial purposes.*
- *Applicants to receive bison must insure the recipients commitment to manage the bison for other than commercial purposes.*

Yet the entire proposal is to give these animals to either:

- the largest bison rancher in the United States who currently raises them for slaughter including one day “bison hunts” or;
- a park in Wyoming where they would be privately owned and classified as livestock.

The bison in question and their progeny are free-ranging animals transferred from U.S. Department of Interior to the MDFWP under a research permit. They have now completed the quarantine protocol and are eligible for the promised translocation to suitable public sites. The fact the MDFWP was grossly negligent in finding a specific site does not negate the original assessment and the commitments made to the public at that time. It certainly doesn’t justify the suggestion that the State of Montana abandon their public trust responsibilities in wildlife management and blatantly engage in the privatization and commercialization of wildlife. There are certainly other options. If those other options need time to develop, then we suggest leaving the bison where they are and halt the research project until space becomes available for any additional bison that are brought into the program. You can’t simply continue to make the problem worse until you can live up to commitments already made to both the bison, their calves, and the public.

The state owns a number of Wildlife Management Areas, some of which are commercially grazed by private landowners. It would seem that the commercial grazers could be asked to leave these public lands for the duration of holding the bison in question until other public release sites are found. After all, the purpose of Wildlife Management Areas is to manage these areas for wildlife.

We request the Montana Fish, Wildlife and Parks Commission to vigorously assume their leadership role as ascribed by law, and proudly defend Montana’s public trust wildlife resource from commercial exploitation – exploitation that would astonishingly be facilitated by the state! The beginning of the end of one hundred years of wildlife conservation must not start here and now. We strongly request that all options that would result in any type of privatization of existing wildlife or their future offspring be rejected.

In conclusion, there are other options for these animals, and in the final analysis, any other option is superior to privatizing and commercializing this wildlife resource.

Sincerely,

A handwritten signature in black ink that reads "Stan Frasier". The signature is written in a cursive, flowing style.

Stan Frasier
President