

The Conservation Congress has read the comments submitted by Paul Richards (comments below) and we concur with them in their entirety. Please enter into the record our support of these comments. We also wish to reiterate the abysmal job the MDFWP has done in the management of our wild bison. If that weren't bad enough now the Department is attempting to privatize a public resource. If the MDFWP is incapable of managing our bison they should be turned over to the federal government in the USFWS. The Department has show it is completely inept at managing this valuable public asset and instead caters to a welfare ranching industry hell bent on the destruction of our native bison herds.

Sincerely,  
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January 7, 2010

Subject: Comments on Wild Yellowstone Bison Translocation Draft  
Environmental Analysis, Phase IV Quarantine Feasibility Study

Dear Montana Fish, Wildlife, and Parks Yellowstone Bison Translocation Team,

Thank you for the opportunity to comment on Montana Fish, Wildlife, and Park's "Draft Environmental Assessment on the Translocation of Quarantined Yellowstone Bison."

I would like to go on record as strongly opposed to the Quarantine Feasibility Study. Much better solutions are available. We need to fully protect the

entire Yellowstone bison herd and encourage its growth. We need to create wild Yellowstone bison migratory corridors throughout tribal lands, U.S. Forest Service lands, U.S. Bureau of Land Management lands, state land, wildlife refuges, national parks, roadless wildlands, and wilderness area.

We need to map out all potential bison habitat on public lands. We need to identify all potential winter and summer range on public lands around Yellowstone National Park, with a special emphasis on designating and protecting spring calving grounds.

We need to reduce potential for wild bison to get diseases from domestic livestock. Where any overlaps or potential conflicts might occur, we need to remove domestic livestock from our public lands, to ensure that public wildlife get the habitat they need and deserve. On private lands in the Greater Yellowstone Ecosystem, we need stringent cattle-based brucellosis-risk management programs that will keep our Montana cattle herds completely brucellosis free.

Yellowstone's bison are genetically and behaviorally unique – the ONLY herd with continuously wild ancestry from the days when millions of wild bison migrated freely across the Great Plains. After the government-sponsored holocaust of these bison and the Indigenous Peoples that depended upon them, only 23 wild bison survived, taking refuge in Yellowstone's remote Pelican Valley. Yellowstone's priceless endangered and tattered remnant herd is all that remains of 50 million wild bison! This herd, pushed to the brink of extinction, is America's only remaining wild migrating bison.

Wild Yellowstone bison have naturally migrated to the public lands now contained within National Forests and other public lands for millennia. However, instead of being allowed access to their own habitat on our own public lands, this magnificent and imperiled species has been subjected to mindless slaughter by Montana Department of Livestock cowboys.

Thankfully, the Gallatin National Forest is currently mandated by its Forest Plan to ***“provide habitat for viable populations of all indigenous wildlife species.”*** We all need to work closely with the Gallatin National Forest to make sure it lives up to its Forest Plan. The Gallatin National Forest needs to do everything it can possibly do to encourage wild Yellowstone bison to naturally migrate to public lands adjacent to Yellowstone National Park.

We need to utilize the Gallatin National Forest's mandate to” ***provide habitat for viable populations of all indigenous wildlife species***” as a model for all National Forests and other public lands within the Greater Yellowstone Ecosystem. Every other National Forest within the Greater Yellowstone Ecosystem needs to incorporate similar language into their Forest Plans and their resultant administrative actions.

Public lands must be managed for public wildlife.

America's public lands legacy deserves vibrantly healthy migrating herds of wild bison within the Greater Yellowstone Ecosystem. National Park Service, U.S. Forest Service, U.S. Bureau of Land Management, the States of Montana, Idaho, and Wyoming, and all other public land managers need to take administrative actions necessary to enlarge the wild Yellowstone bison herd, to promote the natural migration of Yellowstone bison, and to provide the publicly-owned habitat so essential for the prosperity of these magnificent wild animals, the very symbols used to portray the American West and the U.S. National Park Service itself.

These solutions worked perfectly for tens of thousands of years. If we are wise enough to return to them, the genetic strength and population of the Yellowstone bison herd (both now under relentless assault by the Montana Department of Livestock) will again become tenable. Yellowstone bison have naturally migrated to these public lands for millennia. The restoration of wild bison within the Greater Yellowstone Ecosystem will become a success story heralded worldwide, perhaps rivaling the proud creation of Yellowstone National Park, the world's first national park.

You, as our Montana Department of Fish, Wildlife, and Parks, need to work closely with the National Park Service and the U.S. Forest Service and other agencies to provide for migration of Yellowstone bison into all National Forests and other public lands around Yellowstone National Park. Yellowstone bison are just like elk. They need access to these public lands.

You, as the Montana Department of Fish, Wildlife, and Parks, need to closely coordinate with the U.S. Forest Service, U.S. Bureau of Land Management, and other agencies to cancel grazing of diseased domestic livestock on public lands in the Greater Yellowstone Ecosystem, to facilitate the return of public wildlife such as the Yellowstone bison to full abundance.

You, as the Montana Department of Fish, Wildlife, and Parks, need to strip the Montana Department of Livestock of any and all authority to regulate or manage in any way the wild Yellowstone bison. We all understand that the wild, migrating Yellowstone bison are not domestic livestock! The disgraceful, disrespectful, and outdated policies of slaughter and gross mismanagement by Montana Department of Livestock cowboys completely ignorant of genetic diversity and strength, healthy ecosystems, biological integrity, and biodiversity are over!

Again: Our public lands must be managed for public wildlife, such as the wild Yellowstone bison. Our public lands' legacy is NOT well served by converting our priceless National Forests into mere commercial cattle feed lots or taxpayer-subsidized mono-culture tree farms.

Let the Yellowstone bison flourish!

Below are some of my specific concerns with your Draft Environmental Assessment:

1. You have not provided adequate time for meaningful public input. With release of this Environmental Assessment to the public at 11:00 a.m. MST on December 15, 2009, the public has been given only 28 days to comment, most of it during the Holiday season. This is unacceptable. The short public comment period for this Draft Environmental Analysis, timed to exactly coincide with everyone's vacations, hardly allows meaningful opportunities for the public to thoroughly digest the disseminated information, ask appropriate questions, and contribute helpful comments. Thus, I hereby formally request that you extend the official public comment period by AT LEAST 90 days.

2. The Montana Department of Fish, Wildlife, and Parks (MFWP) has disseminated misinformation to the public, disguised as fact. MFWP issued a news release on December 15, 2009, announcing the release of its Environmental Assessment to translocate quarantined Yellowstone bison. In the release, MFWP states, "Many Yellowstone bison are infected with brucellosis." Reputable wildlife biologists and those who closely follow this issue know full well that this statement is NOT true! While some estimate that 50 percent of Yellowstone bison have been exposed to brucella abortus, the actual rate of infection is far less. MFWP news releases need to state the fact that "Few Yellowstone bison are infected with brucellosis." MFWP

statements must reflect scientific and biologic reality, rather than Montana Department of Livestock bullshit.

3. All public agencies involved in this mess to date have failed to properly plan for the eventual return of quarantined Yellowstone bison to public and tribal lands. Officially, the Montana Department of Fish, Wildlife, and Parks says "The aim of the project is to determine the feasibility of capturing, raising and breeding bison calves from Yellowstone National Park that are free of brucellosis exposure for the establishment of new wild herds." Yet, on the ground, MFWP and U.S. Department of Agriculture's Animal and Plant Health Inspection Service wasted more than FIVE YEARS, ignoring their publicly stated goal to determine suitable habitat on public or tribal lands. They dropped the ball! They didn't coordinate with the appropriate state, federal and tribal governments! MFWP and USDA's APHIS utterly failed to honor their promise to the public to develop a plan that would ensure the goals of the Quarantine Feasibility Study be met. They have done little to nothing to ensure that public Yellowstone bison will be returned to public and/or tribal lands. Those who sanctioned this inaction need to be removed from their positions. Immediately. Since they are NOT doing their jobs, they should NOT be paid! MFWP and USDA's APHIS need to hire competent professionals that will actually do their jobs, honor their word, and prepare proper alternatives that benefit and encourage the wild Yellowstone bison population.

4. Under section 2.5.3 in the Draft Environmental Analysis, there is an alternative for placing Yellowstone bison in Wildlife Management Areas. This alternative makes sense. It actually supports the publicly stated goals of the quarantine project. Placing wild Yellowstone bison in Wildlife Management Areas has considerable support from the public. As MFWP is Montana's state wildlife agency, it is much more suitable for Yellowstone bison to be placed in a Wildlife Management Areas, than tossing them to Montana Department of Livestock cowboys for unconscionable slaughtering. Wildlife Management Areas may help the quarantined Yellowstone bison regain their wild integrity, lost to their unfortunate imprisonment, being treated as though they were domestic livestock, and being routinely harassed during quarantine.

5. If cattle are present on any Wildlife Management Areas that are suitable for wild Yellowstone bison, the domestic livestock must be removed. The Wildlife Management Areas must be actually managed for wildlife! Placing

quarantined Yellowstone bison on Wildlife Management Areas follows the stated goals of the Quarantine Feasibility Study. Therefore, MFWP must identify many potential Wildlife Management Areas and prepare environmental analyses for these proposed sites. MFWP must work closely with all other state and federal agencies and to secure funds, equipment, and personnel for the purpose of placing Yellowstone bison on these Wildlife Management Areas to be managed by MFWP.

6. The Montana Department of Fish, Wildlife, and Parks (MFWP) has hundreds of thousands of acres of public land where wild Yellowstone bison can be relocated. Right now! Yet, MFWP has failed to adequately assess potential public lands' bison habitat and disseminate the necessary information to the public. The Robb/Ledford Wildlife Management Area, for example, is suitable public habitat that is currently available. "The primary goal of Montana's Wildlife Management Areas is to maintain vital wildlife habitat for the protection of species and the enjoyment of the public," claims MFWP. "MFWP's Wildlife Management Areas are managed with wildlife and wildlife habitat conservation as the foremost concern," the agency's Web site continues. "Wildlife Management Areas protect important wildlife habitat that might otherwise disappear from the Montana landscape." (<http://fwp.mt.gov/habitat/wma.html> )

7. The Montana Department of Fish, Wildlife, and Parks can better achieve its goals of conserving soils, protecting watersheds, and restoring indigenous plant and wildlife diversity within these Wildlife Management Areas by utilizing wild bison, instead of perpetuating the destruction caused by domestic livestock ill-suited for the arid West. Thus, I hereby respectfully request that MFWP prepare proposals to reintroduce Yellowstone bison on Wildlife Management Areas and submit those proposals to the public to give us the opportunity to review and comment upon them.

8. The U.S. Department of Interior is the agency responsible for restoring the wild Yellowstone bison to public and tribal lands. This agency is the largest public land owner in the United States. Given that the U.S. Department of Interior has developed a "Bison Conservation Initiative," they should immediately be made full partner in planning and assisting with placement of quarantined Yellowstone bison on public and tribal lands.

9. The Gros Ventre and Assiniboine Tribes of the Fort Belknap Indian Reservation have submitted proposals for locating the quarantined

Yellowstone bison "on tribal and public lands in a manner that promotes cultural enhancement, spiritual revitalization, and ecological restoration." These tribes have been working in earnest to bring bison back home for many years now. The appropriate state and federal agencies need to quit equivocating and fully support these tribes! The tribes want to establish a permanent herd from Yellowstone bison on 22,000 acres. It is the hope of many that wild bison will ultimately occupy even more of the Fort Belknap reservation's 675,000 acres. What possible rationalization is there for the State of Montana and the U.S. government to deny the tribes this life-giving opportunity? How can the State of Montana and the U.S. government possibly deny that the stated goals of the Quarantine Feasibility Study are to return Yellowstone bison to public and tribal lands? It is now time to support the tribes!

10. Privatizing the public's wildlife resources and the Yellowstone bison entirely abrogates the goals of the Quarantine Feasibility Study. Transferring wild Yellowstone bison to Ted Turner effectively removes our public wildlife from the public trust. Any alternatives that undermine the stated intents and goals of the Quarantine Feasibility Study need to be discarded without a further thought.

11. The USDA's Animal and Plant Health Inspection Service, MFWP's partner agency in the Quarantine Feasibility Study, has stated publicly their opposition to privatizing our public wildlife, by converting these wild Yellowstone bison into a commercial commodity. A U.S. Department of Agriculture veterinarian has criticized this privatization, saying it goes against the original intent of the Yellowstone bison relocation program launched in 2005, according to the November 11, 2009, Bozeman Daily Chronicle.

12. The Montana Department of Fish, Wildlife, and Parks (MFWP) has not outlined any plans or entertained any public discussions for the eventual release from Ted Turner Enterprises, Inc. to public and/or tribal locations after the five years of quarantine following translocation. Again, the stated purpose of the Quarantine Feasibility Study was to use these Yellowstone bison to help repopulate public and tribal bison herds, and to restore bison to public and tribal lands. Any alternative that allows Ted Turner Enterprises, Inc., or any other private entity, to claim possession of our publicly owned wild Yellowstone bison does NOT meet the stated goals of the project and, therefore, MUST be eliminated!

13. Any alternatives that allow Ted Turner Enterprises, Inc., or any other private entity to TEMPORARILY hold any of the public's Yellowstone bison must incorporate irrevocable commitments that the ultimate placement of these original quarantined Yellowstone bison and all of their offspring will be onto public and/or tribal lands. Specific time limits must be enacted to expedite removal of our public wildlife from private hands and to restore public wildlife to the public or tribal commons.

14. No alternative should be considered that allows Ted Turner to keep ANY of the quarantined Yellowstone bison's offspring born during ANY temporary placement on Turner's private properties, as this would directly undermine the intent of the Quarantine Feasibility Study. Allowing Ted Turner to "increase genetic diversity" of his own private Castle Rock bison herd solely benefits a private commercial business at the considerable expense of successfully repopulating public and/or tribal herds. How can we make this any more clear? Wild Yellowstone bison are PUBLIC wildlife, NOT Ted Turner's private domestic livestock!

15. The preferred alternative to translocate captured wild Yellowstone bison to the private lands of Ted Turner Enterprises, Inc., is ridiculous, because it effectively removes public wildlife from the public trust, and removes the potential for Yellowstone bison to be returned to tribal lands, both of which are the stated goals of the Quarantine Feasibility Study. See Yellowstone National Park Permit #YELL-2007-SCI-5506 (See page 3 of 4).

16. Proposing the translocation of wild Yellowstone bison out of the public trust to Ted Turner or any other private landowner demonstrates a dismal failure to fully evaluate and meet the stated goals of the Quarantine Feasibility Study, which are to: "determine the feasibility of capturing, raising and breeding bison calves from Yellowstone National Park that are free of brucellosis exposure for the establishment of new wild herds," (MFWP Press Release 12/15/09).

17. ALL Yellowstone bison and progeny MUST be reintroduced into public and/or tribal herds as part of the Montana Department of Fish, Wildlife, and Parks' policy of "direct management" after the five-year quarantine period following translocation

18. Need we say it one more time? NO wild Yellowstone bison or progeny should be permanently turned over to Ted Turner! This privatization of



public wildlife would result in the loss of wild Yellowstone bison genetics that could otherwise be used to repopulate public and/or tribal herds. Exploiting these Yellowstone bison or any of their offspring for private commercial gain is against the stated goals of the Quarantine Feasibility Study. Therefore, any alternative involving transferring of ownership of the public's wild Yellowstone bison offspring to private bison ranches must be eliminated! Please refer to Yellowstone National Park Permit #YELL-2007-SCI-5506 (page 3 of 4).

19. Alternative C, 2.3, in the Draft Environmental Analysis calls for placing 14 wild Yellowstone bison in Wyoming's Guernsey State Park for five years with NO planning for long-term placement. This temporary placement of Yellowstone bison in a state park would confine these wild, migratory beasts into too small of an area. In other words: A ZOO! Zoos do NOT protect the inherent wild traits that define American bison as wildlife.

20. Alternative C, 2.3, in the Draft Environmental Analysis calls for retaining 30 wild Yellowstone bison in quarantine facilities and slaughtering 40 of the wild Yellowstone bison. This proposed slaughter makes a farce of the stated goals of Quarantine Feasibility Study. Please refer to Yellowstone National Park Permit #YELL-2007-SCI-5506 (page 3 of 4). Again, NO more wild Yellowstone bison can be slaughtered! NO alternatives that provide for slaughtering any wild Yellowstone bison should receive ANY consideration. How many times do we have to say this? We've been saying it for more than 20 years now!

21. ANY slaughter of any wild Yellowstone bison does NOT meet the stated goals of Quarantine Feasibility Study and, therefore, must be entirely eliminated as options. All alternatives prepared by the Montana Department of Fish, Wildlife, and Parks (MFWP) must recognize the need to manage Yellowstone bison as an imperiled wildlife species, not as diseased domestic livestock.

22. Yellowstone National Park's wild bison temporarily transferred to quarantine must NEVER be exploited for commercial or revenue-generating purposes. Again, please refer to Yellowstone National Park Permit #YELL-2007-SCI-5506 (page 3 of 4).

23. According to the Scientific Research and Collecting Permit issued by Yellowstone National Park to USDA's APHIS and the Montana Department

of Fish, Wildlife, and Parks; quarantined bison captured from Yellowstone "may be used for scientific or education purposes only, and shall be dedicated to public benefit and be accessible to the public in accordance with National Park Service policies and procedures." ALL alternatives proposed by MFWP or any other agencies must comply with this mandate. If an alternative does not comply with this mandate, it should not be considered.

24. Additionally, the Scientific Research and Collecting Permit issued by Yellowstone National Park to USDA's APHIS and the Montana Department of Fish, Wildlife, and Parks unequivocally states that Yellowstone bison removed to quarantine "may not be used for commercial or revenue-generating purposes unless the permittee has entered into a Cooperative Research and Development Agreement or other approved benefit-sharing agreement with the National Park Service. The sale of collected research specimens or other unauthorized transfers to third parties is prohibited." Again: ALL future alternatives proposed by MFWP or any other agencies must comply with this mandate. If an alternative does not comply with this mandate, it can no longer be considered.

25. The Scientific Research and Collecting Permit issued by Yellowstone National Park to USDA's APHIS and Montana Department of Fish, Wildlife, and Parks also states that Yellowstone bison in quarantine are still considered "Federal property." The National Park Service must be contacted prior to any quarantined Yellowstone bison being. The permit specifically states: "They shall not be destroyed or discarded, without prior National Park Service authorization." ALL alternatives proposed by MFWP or any other agencies must comply with this mandate.

26. ALL alternatives proposed by the Montana Department of Fish, Wildlife, and Parks or any other agencies must fully acknowledge the authority of Yellowstone National Park and the U.S. Department of Interior to intervene and prevent the slaughter of ANY more wild, migrating Yellowstone bison, whether these bison are contained within a quarantine process or left unmolested in the wild.

27. Yellowstone National Park's permit prevents bison from being used for commercial benefit. The U.S. Department of Interior's National Park Service and Yellowstone National Park have unimpeachable jurisdiction over all bison and their offspring remaining in quarantine. Therefore, it is within the National Park Service's responsibilities to intercede and prevent any

commercialization of bison. ALL alternatives proposed by the Montana Department of Fish, Wildlife, and Parks or any other agencies must fully acknowledge this fact.

28. The USDA's APHIS, U.S. Forest Service, U.S. Bureau of Land Management, Montana Department of Fish, Wildlife, and Parks, or Montana Department of Livestock cannot be allowed to slaughter ANY more wild Yellowstone bison. An alternative must be prepared to immediately strip the Montana Department of Livestock of any and all authority to harass, slaughter, intimidate, or otherwise attempt to control wild Yellowstone bison. In this alternative, other state and federal agencies must commit themselves to the migration of wild Yellowstone bison onto National Forest lands. As the National Forests of the Greater Yellowstone Ecosystem reach their capacity, bison from these public lands can continue replenishing tribal efforts to reestablish wild migrating bison on their reservations and adjacent public lands.

29. The Quarantine Feasibility Study fails completely to meet goals set by the Montana Department of Fish, Wildlife, and Parks. State and federal agencies have thus far wasted millions of tax dollars in their misguided attempts to destroy the biological integrity of the last remaining wild migrating bison herd in the world! Due to the absence of competent long-range planning and lack of public information or discussion regarding MFWP's eventual "direct management" (an ominous term repeatedly used by MFWP, but NEVER actually defined) over quarantined Yellowstone bison and their offspring, ALL alternatives presented to date are therefore incomplete.

30. We need to start anew, with scientifically-backed alternatives that place quarantined wild Yellowstone bison back onto public and/or tribal lands. We need alternatives where the state and federal actually support the preparation of tribal lands for receiving and maintaining quarantined wild Yellowstone bison.

31. As repopulating tribal herds are stated goals and priorities in the Quarantine Feasibility Study, all agencies involved need to commit themselves to an alternative that placed wild Yellowstone bison in existing tribal herds or reintroducing bison to tribal lands. Once placed, the agencies need to ensure that all bison are allowed to migrate to the fullest extent possible throughout reservations and adjoining public lands.

32. Alternative B, 2.2, the "No Action" alternative in the Draft Environmental Analysis, calls for slaughtering 58 wild bison for "research." This alternative is disgusting! It effectively negates five full years of scientific research. It fails to meet the stated goals of the Quarantine Feasibility Study. Alternative B, 2.2 must therefore be eliminated from being considered a legitimate option.

33. With the Montana Department of Fish, Wildlife, and Parks' and the USDA's APHIS's failure to plan for and secure tribal and/or public habitat for these Yellowstone bison, as is the stated goal of the Quarantine Feasibility Study, further quarantine of wild Yellowstone bison captured for the purpose of study must immediately be halted.

34. Any and all slaughter of the wild migrating Yellowstone bison must cease immediately. Slaughter is absolutely unnecessary, as there are millions of acres immediately available on state, tribal, U.S. Department of Interior, and U.S. Forest Service lands, where wild Yellowstone bison must be allowed to migrate. Please refer to Yellowstone National Park Permit #YELL-2007-SCI-5506 (page 3 of 4).

35. As the Quarantine Feasibility Study has proven to be a complete failure, I am strongly opposed to it in its present form. The Montana Department of Fish, Wildlife, and Parks (MFWP) and the USDA's APHIS have demonstrated extreme ignorance concerning how the quarantine process, in all of its aspects, adversely affects the behaviors of imprisoned wild Yellowstone bison.

36. The Montana Department of Fish, Wildlife, and Parks (MFWP) and the USDA's APHIS have failed to properly plan to ensure that the stated goals of returning Yellowstone bison to public and tribal lands would be met. MFWP and the USDA's APHIS have had years with which to evaluate suitable public and tribal lands, and to work with state, federal and tribal governments to ensure that the objectives of the Quarantine Feasibility Study would be satisfied. As the agencies have thus far failed to achieve any results, they need to go back to the drawing board, hopefully with new, competent staff. In these new efforts, MFWP and the USDA's APHIS must acknowledge that there have NO benefits from harassing, capturing, imprisoning, and quarantining this severely-imperiled keystone native wildlife species.

37. The Montana Department of Fish, Wildlife, and Parks (MFWP) needs to immediately release the Yellowstone bison currently being held in the quarantine facility back to the wild – to suitable tribal or public lands habitat. See Yellowstone National Park Permit #YELL-2007-SCI-5506 (See page 3 of 4).

38. The many management failures of the Montana Department of Fish, Wildlife, and Parks of the USDA's APHIS, described above, must be quantified, documented, and fully disclosed to the public, news media, federal, state, and tribal agencies, and Congress. This could best be done in an entirely new and comprehensive Environmental Impact Statement that addresses all of the concerns raised herein.

39. The Montana Department of Fish, Wildlife, and Parks must prepare Environmental Impact Statements that map out all potential bison habitat, including winter, spring, and summer range, designated calving areas, and migratory corridors.

#### CONCLUSION:

The wild Yellowstone bison population is the LAST continuously wild population of American bison to occupy their native range. The wild Yellowstone bison are the only bison remaining on Earth that retain their identity and integrity as a true wildlife species.

The ongoing mismanagement of this endangered keystone species by the Interagency Bison Management Plan and all of its components including quarantine and indiscriminate slaughter, directly jeopardizes the evolutionary potential and wild integrity of a species that is critical to the ecological health and restoration of North America's grassland and prairie ecosystems.

By forestalling the migration of the wild Yellowstone bison throughout public lands of the Greater Yellowstone Ecosystem, our Nation is deprived of its national heritage. Yellowstone's bison are genetically and behaviorally unique – the only herd with continuously wild ancestry from the days when 50 million bison migrated freely across the Great Plains!

It is now time to address and correct the U.S. government-sponsored holocaust of these bison and the Indigenous Peoples that depended upon them. The relationship between bison and First Nations cultures can no longer be disrespected or subverted throughout the government's wholesale

slaughter of wild bison. All proposed alternatives to the Quarantine Feasibility Study and all subsequent wild Yellowstone bison management proposals must start by recognizing First Nations' cultures that hold bison sacred as an integral part of their lives, traditions, and spirituality.

With the Yellowstone bison, we are charting the future for the world's only wild migrating bison herd. All agencies involved in the Interagency Bison Management Plan and its various management facets must seek the wisdom, guidance and direct participation of First Nations in order to ensure that this irreplaceable population of American bison is not placed in further jeopardy.

ALL future alternatives presented to the public must truly respect the wild Yellowstone bison by encouraging genetic diversity, guaranteeing biological integrity, increasing migration, and establishing viable wild bison populations throughout tribal land, U.S. Forest Service land, U.S. Bureau of Land Management land, state land, wildlife refuges, national parks, and wilderness areas. All environmental reviews and documents of all federal, state, and tribal agencies need to start with these basic assumptions.

Thank you for this opportunity to comment. Please heed these comments. Please enter them into any hearing record or other similar assemblage of public comments.

Please keep me thoroughly informed concerning all proposals, decisions, and management actions affecting our last free and wild migrating Yellowstone bison.

Sincerely,

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