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# STATE OF MONTANA

BRIAN SCHWEITZER, GOVERNOR

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## DEPARTMENT OF LIVESTOCK

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February 1, 2010

Suzanne Lewis  
Superintendent  
PO Box 168  
Yellowstone National Park WY, 82190

HAND DELIVERED

Superintendent Lewis,

Thank you for your communication dated January 26<sup>th</sup> 2010, expressing concerns with MDOL proposed changes to bison management in the Western Management Area.

On several occasions, MDOL discussed with the IBMP managers how the 2008 Adaptive Management (AM) plan may have contributed to these numerous boundary breaches as well as to the lack of successful haze back until June 17, 2009 (over 30 days following the deadline). Further, MDOL requested that that this topic be fully deliberated at the August IBMP meeting, and Yellowstone National Park personnel suggested that these discussions be deferred to a future date because of the complexity of the topic. The fact that this request was made, and that the topic was tabled is documented in the August 11-12, 2009 IBMP meeting summary. Please refer to the agenda for the November 17-18, 2009 meeting and note that the topic was listed for discussion.

As I described above, all IBMP partners were well aware that these difficult deliberations needed to take place prior to the 2009-10 management season. While you are indeed correct that the Annual Report for 2008-09 was signed shortly prior to the November 17-18 meeting, the Annual Report is not intended to list comprehensive AM changes, but rather to provide a summary of the previous year's activities. Under 1.1a, this same report lists the numerous difficulties in managing bison during the 2009 season.

Your letter suggests that the MDOL proposal would impede our understanding of bison movement in the Western Management Area. I suggest that every management season allows us greater understanding of bison dynamics. The 2009 management season provided much insight into unrestricted bison tolerance within Zone 2, and likewise, the 2010 management season will further our understanding of bison behavior within the framework that we establish. Adjustments to bison tolerance within the boundaries established by the Record of Decision is Adaptive Management.

I appreciate your suggestions for alternatives to the MDOL proposal. The overriding operational shortcomings of the Adaptive Management Plan that our proposal is trying to address are maintaining the Zone 3 boundary and meeting the target haze back date of May 15. A recommendation made in your letter states that IBMP managers focus on impeding bison movements into Zone 3 when cattle are present. However, as per both the state and federal ROD, there is no tolerance for bison in Zone 3 at any time. This needs to be the focus of IBMP managers throughout the management season in order for the plan to be successful.

Additionally, I reiterate the importance of the haze back date in order to leave the requisite temporal separation before cattle are present. While the partners recognize that small adjustments may be necessary due to weather, the 2009 date of June 17 is unworkable. This issue also needs the focus of the IBMP managers.

Long term, several actions need to be taken in order to ensure we meet the two goals of the IBMP. Please take these into consideration for the record:

1. It is in the best interest of the state of Montana and the long term benefit of YNP bison that the NPS rapidly publish the Environmental Impact Statement on vaccination. Publishing this document and commencing with vaccination is an important step, not only in regards to the progression of the Record of Decision, but also reduce the prevalence of brucellosis in YNP wild ungulates. We look forward to the publication of that EIS.
2. Begin discussion on novel and politically acceptable strategies to reduce brucellosis prevalence over what can be achieved by vaccination alone. This includes immuno contraception
3. Developing management strategies consistent with the desired population range stated by YNP. In the 2010 management season, the population of YNP bison again exceeds 3000 animals with the likely consequence of significant outmigration, and challenges in management and possible bison contact with livestock. No other wildlife population is managed without consideration of the ecological balance between foraging species and forage. Committing to a YNP bison population target and identifying specific management actions to be taken when that target is exceeded is a missing, critical component that would serve the bison as well as the State of Montana.

Thank you again for your communication. I look forward to further deliberating, and hopefully solving this difficult issues with you and the other IBMP partners.

Sincerely,



Christian Mackay  
Executive Officer,  
Montana Board of Livestock

cc. Pat Flowers  
Mary Erickson  
Dr. Brian McCluskey  
Ervin Carlson  
Samuel Penney  
James Steele