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Buffalo Field Campaign preliminary comments on March 31, 2011
ENVIRONMENTAL ASSESSMENT PINE CREEK LAND EXCHANGE

Buffalo Field Campaign supports the inclusion of a fence-free deed restriction for the Eagle Creek parcel to be exchanged.

Dear Supervisor Mary C. Erickson and Project Manager Gary E. Howard,

Thank you for the opportunity to comment on the Pine Creek land exchange.

Unless a fence-free deed restriction can be agreed to protecting Eagle Creek's wildlife habitat values Buffalo Field Campaign supports taking no action on the decision.

Please consider all of our comments in detail including the development of a fence-free deed restriction that best protects America's last wild buffalo and their habitat on the Gallatin National Forest.

Buffalo Field Campaign was founded in 1997 to stop the slaughter of Yellowstone's wild buffalo herd, protect the natural habitat of wild free-roaming buffalo and native wildlife, and to work with people of all Nations to honor the sacredness of the wild buffalo.

Buffalo Field Campaign is located in West Yellowstone, Gallatin County, and also in Gardiner, Park County, and is supported by volunteers and citizens in Montana, Idaho and Wyoming and by people from around the world who value America's native wildlife and the ecosystems upon which they depend, and enjoy the natural wonders of our irreplaceable public lands.

As an organization and on behalf of our members, Buffalo Field Campaign is concerned and actively involved with protecting the last remaining descendants of indigenous bison in North America to occupy their original range in the Greater Yellowstone ecosystem. Buffalo Field Campaign actively publicizes the plight of the buffalo to end their slaughter by government agencies, and to secure long-term protection for viable populations of wild buffalo and year-round habitat in the Greater Yellowstone ecosystem. Buffalo Field Campaign actively engages the American public to honor our cultural heritage by allowing wild buffalo to exist as an indigenous wildlife species and fulfill their inherent ecological role within their native range, and serve as the genetic wellspring for future wild, free ranging buffalo populations.

Buffalo Field Campaign appreciates the Gallatin National Forest's effort in securing a deed restriction to prevent fertile cattle or domestic bison from grazing on the proposed land exchange in Eagle Creek.

While new residences permitted in the land exchange would permanently remove wildlife habitat, buffalo have shown an ability to adapt as people tend to permit more grass and shrubs around their dwellings.

Eagle Creek is good buffalo habitat.

Buffalo migrate through the creek drainage and bulls in particular are drawn to habitat on the Gallatin National Forest. Buffalo Field Campaign has observed solitary bulls, bull groups, and females with newborn calves in Eagle Creek drainage.

In the absence of fencing and grazing domestic livestock on Gallatin National Forest habitat for the last 40 years, more buffalo would have ultimately used and migrated through the Special Use Permit pasture/Eagle Creek.

Migratory buffalo provide ecological benefits for the Forest – values often overlooked, poorly understood, and little recognized in management decisions that impact the indigenous species viability.

Given the time, space and overall restrictions forced on migratory buffalo in Gardiner basin through the ill-conceived Interagency Bison Management Plan, Eagle Creek gains importance as seasonal and year-round habitat on the Gallatin National Forest.

To properly analyze the decision before the Gallatin National Forest, the agency must consider cumulative land use impacts and take a hard look at its own decisions impacting buffalo habitat, namely, permitting cattle grazing allotments, fencing schemes (RTR 30-year lease/Devil's Slide/Yankee Jim Canyon/Eagle Creek SUP), buffalo traps, and lands acquired by the American people for their native wildlife habitat values that have not been managed by the Forest for viable wild buffalo populations (RTR/OTO/Taylor Fork/Duck Creek), among them.

Given these prior decisions by the Forest, Buffalo Field Campaign seeks a deed restriction protective of the habitat values that would freely permit migration, that is, no fencing on the Gallatin National Forest parcel to be exchanged in perpetuity with the Hoppe family and their heirs, assignees.

Buffalo Field Campaign is also concerned about this language:

"If at some future point the brucellosis issue is resolved or the Interagency Bison Management Plan is modified to address brucellosis concerns, this deed restriction will be reviewed and may be amended by mutual agreement between the United States, acting through the Forest Supervisor of the Gallatin National Forest, and the Grantee, heirs and assigns."

The Gallatin National Forest does not have a track record of protecting buffalo habitat as a manageable component accomplishing its Forest Plan goal of providing "habitat for viable populations of all indigenous wildlife species . . ." If there is to be any amendment to the deed restriction addressing livestock conflicts it should be more protective of wildlife habitat and not open ended as the language above suggests.

Eagle Creek is one of the few places on the Gallatin National Forest where buffalo are not harassed or harmed year round. If a fence-free deed restriction can be agreed to Buffalo Field Campaign would not stand in opposition to the land exchange.

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Buffalo Field Campaign incorporates as part of our comments the following documents that the Forest needs to evaluate and consider in its decision.

1. Buffalo Field Campaign, Statements made on the Royal Teton Ranch or RTR in the Record of Decision for the Interagency Bison Management Plan 2000.
2. Buffalo Field Campaign, Bison observations Gardiner basin, wildlife database report 2000-2011.
3. Buffalo Field Campaign, A Glimpse at the Economy Generated by Montana's Wildlands, Wildlife, Recreation and Open Spaces, April 2011.
4. Buffalo Field Campaign, U.S. Government Accountability Office Investigates Bison Plan and Land Deals Funded by American Taxpayers, November 2009.
5. Buffalo Field Campaign, LAND USE DECISIONS BY THE GALLATIN NATIONAL FOREST FAIL TO PROVIDE HABITAT FOR VIABLE WILD BISON POPULATIONS, November 2009.
6. Dr. Sylvia Fallon, The ecological importance of bison in mixed-grass prairie ecosystems, 2009.
7. Gallatin National Forest, Decision Memo for Horse Butte Bison Capture Facility Special Use Permit Renewal, January 13, 2009.
8. Gallatin National Forest, Decision Notice for 320 Ranch – Taylor Fork Acquisition, April 2002.
9. Gallatin National Forest, Decision Notice Plan Amendment Northern Yellowstone Winter Range Acquisition OTO Tract January 2006. Map.
10. Gallatin National Forest, Gardiner Ranger District, Cattle/Horse Allotments on National Forest Lands in the Gardiner Basin, January 2007. Map.
11. Gallatin National Forest, ROYAL TETON RANCH LAND CONSERVATION PROJECT WITH BISON MIGRATION CORRIDOR. Map.

12. Gallatin National Forest, Gallatin Forest Plan, 1987.
13. Gates et al, THE ECOLOGY OF BISON MOVEMENTS AND DISTRIBUTION IN AND BEYOND YELLOWSTONE NATIONAL PARK A Critical Review With Implications for Winter Use and Transboundary Population Management, 2005. Map of bison winter ranges and winter movement corridors.
14. Geist, Devil's Slide Conservation Easement, February 2007.
15. Geist, Royal Teton Ranch – Devil's Slide Land Conservation and Wildlife Habitat Agreement in Yellowstone, February 2007.
16. Geist, Status Review of Public Lands Grazing, November 2007.
17. Geist, Gardiner and Hebgen Lake Public Lands Grazing, excel spreadsheet updated 2010.
18. Craig Jourdonnais, Montana Fish, Wildlife & Parks, Winter Range Assessment for Bison Upper Gallatin River Drainage, DRAFT, January 20, 2006.
19. Thomas Lemke, Montana Fish Wildlife & Parks, Bison Habitat Evaluation East of the Yellowstone River from Dome Mountain to YNP, February 14, 2006. (Maps not included)
20. Thomas Lemke, Montana Fish Wildlife & Parks, Wildlife Habitat and Wildlife Use on and Near the Royal Teton Ranch, July 1997.
21. Montana Fish Wildlife & Parks, Draft Bison Hunting EA, 2004.
22. Montana Fish, Wildlife & Parks and Church Universal & Triumphant, 30-year lease agreement, December 2008.
23. Montana Fish, Wildlife & Parks, Potential Range for Northern Yellowstone Bison. Map.
24. Montana Fish, Wildlife & Parks, Bison Hunting Regulations 2006. Map.
25. Montana Fish, Wildlife & Parks and Gallatin National Forest, Available Habitat Expansion Areas, August 11-12, 2009.
26. Northern Region, Gallatin National Forest, Proposed Purchase - Duck Creek Wetlands. Map.
27. U.S.D.A. Animal and Plant Health Inspection Service, IBMP Private/Public Cattle Grazing 2008. Map.

28. U.S.D.A. Animal and Plant Health Inspection Service, IBMP Private/Public Cattle Grazing Changes-West Side. Map.
29. U.S. Department of the Interior, FEIS and Bison Management Plan for the State of Montana and Yellowstone National Park, Record of Decision, 2000.
30. Yellowstone National Park, Bison Ecology and Management Office, Numbers of bison observed in northern Interagency Bison Management Plan zones in and adjacent to Yellowstone National Park during an aerial survey on May 10, 2008. Map.
31. Yellowstone National Park, Bison Ecology and Management Office, Abundance and distribution of Yellowstone Bison February 21 2010. Map.
32. Yellowstone National Park, Bison Ecology and Management Office, Aerial Census February 12 2006. Map.
33. Yellowstone National Park, Bison Ecology and Management Office, Bison Management Zone Monitoring Flight May 13, 2003. Map.
34. Yellowstone National Park, Bison Ecology and Management Office, Bison Population Briefing for Park Management April 16 2008. Map.
35. Yellowstone National Park, Bison Ecology and Management Office, Distribution of bison observed June 12, 2009. Map.
36. Yellowstone National Park, Bison Ecology and Management Office, Distribution of groups of bison located Aerial Surveys February 20-21 2004. Map.
37. Yellowstone National Park, Bison Ecology and Management Office, Distribution of Yellowstone bison April 18 2009. Map.
38. Yellowstone National Park, Bison Ecology and Management Office, Distribution of Yellowstone bison May 10 2009. Map.
39. Yellowstone National Park, Bison Ecology and Management Office, Number and distribution of bison observed Aerial Survey April 11 2008. Map.
40. Yellowstone National Park, Bison Ecology and Management Office, Number and distribution of bison observed Aerial Survey June 14, 2008. Map.
41. Yellowstone National Park, Bison Ecology and Management Office, Relative abundance of bison observed Aerial Survey March 10 2008. Map.