



**BLUE GOOSE ALLIANCE  
1050 MATADOR DR. SE  
ALBUQUERQUE, NM 87123**

**MISSION:**

*To Promote The Establishment Of The  
National Wildlife Refuge Service  
As A Separate Agency Within The  
U. S. Department Of The Interior*

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Post Office Box 25486; Denver Federal Center  
Denver, CO 80225-0486

October 6, 2019

Mr. Garza; Refuge Manager Coffman; and Ms. Fields:

**RE: Final Comprehensive Conservation Plan (CCP) - National Bison Range.**

These comments are submitted on behalf of the Blue Goose Alliance, a private, non-profit conservation organization. The BGA's focus is primarily the National Wildlife Refuge System: its Integrity, Stature, and Autonomy. We have closely followed and often commented upon issues associated with the National Bison Range (NBR) and Complex (NBRC) since our founding in 2000. Our members and supporters often visit the refuges in the complex. Most of our BGA Associates are retired refuge managers and employees, refuge and Fish and Wildlife Service (FWS) administrators, avid past and present volunteers and others deeply interested in conservation of wildlife (including plants) and their respective habitats across North America.

At the outset, while writing these comments on the Final draft of the NBR CCP, I reassert the BGA comments to the Draft CCP, believing that most of them remain pertinent to the FWS issued Final CCP. I herein present some slightly altered comments that on topics I presented in our previous submission. These are often brief statements I believe are fundamentally important and feel the Final draft remains inadequate in properly and/or fully presenting the topic to the general public. I strongly urge you, the FWS planners involved in the NBR documents, to read these constructive comments and consider making changes to the draft in order to better serve the national public interest. I also present several new observations on portions of the CCP/EIS.

**Establishment of The National Bison Range**

The establishment of the National Bison Range was unique in several important features deserving recognition in this CCP. Unfortunately, the history section in the Final CCP document omits important details or explanatory information concerning primary purposes, origins of the founding bison and other large grazing mammals, as well as past management concerns and practices. Those omissions prevent the interested nationwide public from having information regarding the national significance of this vital National Wildlife Refuge and the need and rationale for continuing to achieve its primary management within the statutory mandates and restrictions of the National

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Wildlife Refuge System as required by the National Wildlife Refuge System Administration Act. The current documents fail in this essential CCP purpose.

Invoking Congressional power of Eminent Domain to establish the NBR was not done lightly. It required President Roosevelt to “reserve and except” a relatively small area from the Flathead Indian Reservation thereby removing them from that reservation for a broader public purpose – permanent conservation of the American plains bison.

The unique genetic composition of founding members of the NBR bison herd derived from several prior private bison herds. Although largely from Alberta, Saskatchewan, and Manitoba, a diversity of other areas from which those founding bison originated included Wyoming, Kansas, Texas and Montana, all captured over a period of years.<sup>1</sup> With that broadly diverse basis coupled with diligence by previous NBR managers in selecting animals for culling the population over the past 111 years, NBR bison currently comprise founding stock for three of the other FWS refuges managing bison as a single metapopulation. Those bison are particularly significant within the limited number of bison managed solely as ‘conservation herds’ because only NBR, among those four refuges has demonstrated a 111-year history of husbanding that unique and important genetic structure. The newer NWRs with bison have yet to prove a capacity and capability to maintain disease-free bison with high genetic integrity.<sup>2</sup>

Maintaining a successful metapopulation requires a demanding commitment of resources, experienced biological expertise, dedicated attention to exacting record keeping among all participating herds, and continuing, updated, attention to the science involved. NBR is a vital anchor point in the FWS metapopulation concept.

Federal Payments for NBR lands removed from the Reservation

The final acquired acreage removed from the Reservation totaled 18,523.85 acres and the calculated appraised value amounted to \$28,955.48. <sup>3</sup> (equal to \$813,485.73 in current dollars) A later lawsuit by the Confederated Salish and Kootenai Tribes made its way to the U.S. Court of Claims. A full discussion of related issues, opinions, findings, and conclusions was published in Docket No. 50233 on Jan. 22, 1971 (as amended Apr. 23, 1971). Cited as: 437 F.2d 458-485 (1971).

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<sup>1</sup> Garretson, Martin 1938. *The American Bison*. New York Zoological Society, pp. 215-217; Coder, George, D. 1975. *The National Movement to Preserve the American Buffalo in the U. S. & CN - 1880 and 1920*. Ph.D. Thesis, OH State Univ. 348 pp.; Zontek, Ken 1993. *Saving the Bison: The Story of Samuel Walking Coyote*. M.A. Thesis, NM State Univ. 167 pp.; Zontek, Ken 1995. *Hunt, Capture, Raise, Increase: The People Who Saved the Bison*. Great Plains Quarterly, Vol. 15(2); pp. 133-149; Wood, Judith H. 2000. *The Origin of Public Bison Herds in the United States*. Wicazo Sa Review, Vol. 15, No. 1., Univ. MN Press, Spring, 2000, pp. 157-182. (Available at <http://www.jstor.org>)

<sup>2</sup> Asst. Sec., FWP 2008. *Department of the Interior Bison Conservation Initiative*. DOI, Wash., D.C., Oct. 28, 11 pp.; DOI *Bison Report – Looking Forward 2014*; DOI, National Park Service, 75 pp.; Jones, Lee and T. J. Rolfe 2008. *Management of Bison in the National Wildlife Refuge System – U.S. Fish and Wildlife Service*. 02/27/2008, 11 pp.

<sup>3</sup> Ruth, Clara *op. cit.* pp. 2-5.

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The Court set a new appraisal date of Jan. 1, 1912 (previously dated ca. 1907), resulting in a substantial increase in payments to comply with the U.S. Constitution Fifth Amendment requirement for “just compensation”. CSKT and their attorneys stipulated those results satisfied the Constitutional requirement. The final payment, ca 1975, amounted to more \$24 million (\$110,000,000 in current dollars equivalency) for the 485,171.31 acres removed from the Reservation. That included NBR lands; thus the amount ultimately paid to CSKT and its members for the NBR (3.8% of all lands removed) in equivalent current buying power, exceeded \$4.1 Million.

### **Sentiments of the People**

An excerpt from Dr. Elrod’s Am. Bison Soc. Report, later published by the Society, expressed the feelings of a noteworthy and respected elder. His sense of other tribal elders is important because it established belief among American Bison Society leaders, the Bureau of Biological Survey, President Roosevelt, and the public that the efforts to be undertaken were supported by important tribal members and respected elders living in the Valley. (Emphasis added)

“**Sentiment of the People** – Duncan McDonald rode with me over the proposed range and talked freely. I told him exactly what was proposed. He was bitterly disappointed that the Government of the United States had permitted the Pablo Buffalo herd to go to Canada.

“‘What is the use of hunting for a buffalo range if the Buffalo are all gone?’ was his laconic query, as he turned fiercely toward me while bemoaning the loss of the herd.”

“Duncan, the Buffalo of America are not all dead yet, nor are the men who are trying to save them, I replied.”

“Then I told him of the animals yet living, of which he had read something, and of the plans of the American Bison Society, the men back of the effort to save the noble animal, and the great value to the community if such a herd were located in its midst.”

“If we can get the range, the animals will be put on it, I stated.”

‘Do you think so?’

“I am sure of it.”

‘Professor Elrod, I hope they will do it. We all hope so. The Indians are very sorry to see the Buffalo go. They all love them. They all think the Government should keep them. They don’t want to kill them. They love to see them roam over the hills and plains. Every Indian will be glad if the Government can and will save them and keep them where they can be seen. And if there is anything in this world I can do to help, I want to do it.’

“All the intelligent men whom I have talked with on the reservation express the same opinion. Enterprising people in Missoula with whom the matter has been discussed are hopeful of the outcome, and greatly desire that the undertaking will be worked out successfully. The press has in a number of cases spoken highly of the proposed plan. Few have knowledge of the proposed range, and when its boundaries and the character of the land are understood the plan will meet with universal favor. I have previously mentioned the efforts of Joe Allard to interest Congress in the herd. Col. Rankin, allotting agent, is full of enthusiasm over the plan. There will not be a dissenting man, unless perhaps it may be someone who wants a portion of the range for himself.”<sup>4</sup>

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<sup>4</sup> Elrod, Morton J., PhD. 1908. *The Flathead Buffalo Range – A Report to the American Bison Society of an Inspection of the Flathead Indian Reservation, Montana, For the Purpose of Selecting a Suitable Location for a National Buffalo Range. First Annual Report – Am. Bison Society, NY; pp. 39,41.*

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**Common Elements (Section 2.2)**

The BGA heartily endorses the FWS commitment to comply with all applicable laws, regulations, and policies for management activities that could affect listed refuge resources.

The EIS being prepared for this CCP does not and cannot accurately and entirely address issues requiring NEPA documentation under laws governing AFAs that must also comply with the provisions of the National Wildlife Refuge System Administration Act without specific negotiated terms upon which to base impact analyses. FWS is currently subject to a Federal Court order regarding NEPA compliance for any future AFA at the NBR. BGA's earlier comments addressed this matter in more detail and referred to FWS documentation in NBR and Regional Office files that belie the claims made in these Final CCP/EIS documents. Past documentation of CSKT staff performance on the NBR demonstrated that statements indicating impacts from CSKT management on the NBR "would be the same as Refuge Staff management" have proven not to be true.

The BGA requests that all related premature and erroneous statements regarding possible future CSKT operations within the NBR now in the Final CCP draft should be removed prior to the Regional Director signing a Decision Document.

We strongly recommend that the fifth bullet in this series be entirely deleted.

The bulleted item concerning the Realignment strategy is discussed later in these comments. We briefly note here only: 1) The BGA strongly objects to the realignment because the effects upon the long existing NBR Complex are negative in the extreme and are unwarranted. 2) This document, as in the case of the earlier Draft CCP, claims that the realignment is a matter for the future--while the obvious, provable fact is that the Denver Regional Office of the FWS has made WMTC decisions final and has already implemented them. 3) It is a major Federal Action as defined by NEPA and therefore requires full NEPA compliance.

**The Novel Ecosystem Proposal**

Mention of this apparently new idea several times in the CCP has been noted with alarm. No explanation is made of the process by which this concept will be designed, who will do it; how, when, where it will be tested or evaluated nor the criteria by which it will be applied in the future. No discussion is provided of what controls will be used to ensure the resulting new plant complex doesn't emulate, or facilitate, an unintended expanded invasive species scenario, or otherwise negatively impact the native grasslands. Sources and limitations on components being tested, criteria for defining

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success, costs, including FTEs (expertise and level of experience required) are also unmentioned.

Lacking that basic information on the listed subjects, this idea cannot claim to have been properly evaluated for future impacts in these documents. Is it the intent of the FWS to complete NEPA compliance for this matter after an actual design and all necessary details for its testing, criteria for determining success, actions to avoid unforeseen consequences, likely funding and personnel matters, etc. are developed? We have not found such a commitment in these documents. Without such a commitment regarding future research and full NEPA compliance, this “idea” should be removed from the Final CCP.

### **WMTC NEPA Analysis**

The statement in the Draft CCP that the WMTC is “beyond the scope of this EIS” is obviously untrue and unacceptable. Although claimed in this Final CCP to be a decision to be made in the future, the WMTC was decided and implemented while the Draft CCP was being finalized and released to the public. Potential negative effects, and resulting environmental impacts from the decision are likely to originate from:

- 1) Replacing the long successful, geographically sound, staff efficient and fiscally logical NBR Complex by incorporating it (plus the Lee Metcalf NWR) into a previous Refuge Complex located 249 miles (a three to four-hour drive) from the NBR headquarters (and further from Lee Metcalf NWR) along with its already extensive complex of refuge and conservation easement issues.
- 2) Placing the NBRC, with its proven needs for specific specialized staffing expertise and experience levels, physical plant maintenance requirements, demonstrated huge and demanding visitation stresses under the supervision of a distant unit lacking demonstrated capacity or experience in dealing with many of the above listed management challenges, further complicated by the presence of hundreds of ungulates with a growing presence of large predators, all located within an enclosed 18,900 acre reserve;
- 3) The significant migratory bird management areas, needs and resource commitments on the Bison Range resulting from its designation as a bird reservation, thereby extending the complexity of on-the-ground management expertise required and the range of operations (particularly vital inventory and monitoring requirements and protocols) coupled with geographically distant maintenance demands derived from the other areas of the NBR Complex resulting in impossible demands upon its present and currently planned limited staff.
- 4) Reducing staff grade levels (modifying previous grade certifications and approved staffing plans) for the existing NBR Complex thereby depriving the

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NBR and the Complex of adequate experience levels with demonstrated capabilities;

- 5) Implementing the described changes without general public notification (except the misleading information in the current documents that it will be a future decision and action), lacking acceptable disclosure of resulting lines of authority, budgeting decisions, staff availability during periods of special needs at the NBR, or in case of emergencies.

The WMTC matter obviously represents a major federal action requiring full NEPA consideration. The present CCP/EIS presents the proper time and place for fulfilling that obligation. Proceeding without NEPA compliance brings a potential for a legal challenge to this CCP planning process.

### **Co-Management: not permitted in Refuge Laws**

The National Wildlife Refuge System Administration Act was amended in 1976 (P.L. 94-223), following a disruptive series of actions related to the then existing “joint management” refuges in the System. Also, specific statutory elements were included in the Federal Land Policy and Management Act related to public land withdrawals for National Wildlife Refuges.

Statutory changes also eliminated authority of the Secretary of the Interior and the U.S. President to abolish any refuge then in the system or any refuge subsequently added to the system. Legislative History of these changes reinforce the intent of Congress that co-management of National Wildlife Refuges was to be banned.

Final court decisions since these described events have resolved Refuge System jurisdiction conflicts uniformly in favor of the intended sole management by the Fish and Wildlife Service.

### **CCP Alternatives**

There is only a single item proposed in Alternative C distinctive from previous practices and demonstrated achievements by NBR staff prior to 2004. That is the proposal to “conduct a comprehensive rangeland health assessment.” Looking at Alternative C, considering the documented parameters and demonstrated successes of the NBR prior to 2004, there is no unique vision to be found in its discussion. The BGA supports the proposal to complete such a comprehensive range-wide health assessment. It is a logical proposal that would bring latest best management techniques and assessment capabilities to help guide habitat management during this uncertain time of climate change. It is important that the Regional Office follow through and provide the funding and other resources necessary to accomplish this proposal.

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**Regarding Habitat Management**

The following discussion is based on a published 1931 article (*The Montana Bison Range*. In: *The Forestry Kaimin 1915-1931*, pp. 23-26, 76, 78; MT State Univ.), written by Frank H. Rose, the “Manager” of the National Bison Range during 1923 – ca 1930. Mr. Rose had come to the BBS and NBR from the U.S. Forest Service (U.S.F.S.) having a college degree in Forestry and experience in Intermountain grasslands, desirable grazing practices, and the cool season plant species with special values to grazing animals.

This article was found and copied by the author of these comments in NBR files during 2008 while he volunteered during the Centennial celebration.

Mr. Rose analyzed the obvious overgrazing of the NBR rangelands and sketched out the founding and growth of the bison herd and other ungulates released within its initial boundary fence. He summarized the findings of U.S.F.S. studies regarding cool season grasslands, focusing on the critical spring growth period. Rose initiated the practice of ‘penning’ the buffalo herd while providing them supplemental feeding thereby giving most of the NBR grasslands time for key grass species to gain essential growth. His article provides a brief lecture on the damage caused by the total numbers of grazing wildlife during the period 1921-1929. He centered attention on “Scabrella fescue, the grass that kept the early Montana freighter’s animals’ fat and able to work through the winters....” Rose explained key features of its growth, needs, and likely results from “close grazing” or where the loam soils have been leached. He focused his grazing program and modifications on maintaining that key grassland species.

Mr. Rose was also responsible for installing the first cross-fencing of the NBR (completed in 1929!) which allowed staff to alternate the supplemental feeding and spring grazing regime thereby permitting rest periods of major grazing areas in alternate years.

He stated his firm intention to have further sub-fencing accomplished to expand the options for periodic grassland rest cycles and to give prime protection of the Scabrella fescue areas and documents the successful results from the initial modifications. He also indicated that plans had been made for disposal of surplus animals and that reductions had already reduced the numbers to safer grazing levels. His analysis of expected habitat degradation if Scabrella was allowed to be harmed by too early and continuous overgrazing is well worth reading.

Perhaps the severe austerity of the early 1930s defeated his fencing program; however, the presence of CCC personnel looking for projects during the later 1930s should have resulted in further pasture fencing in the Bison Range. The refuge files may contain records on that matter.

Scabrella Fescue is now called *Rough Fescue* (i.e. *Festuca campestris*) in Montana. My discussions with prior Project Leaders and staff familiar with NBR grazing practices

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affirmed that the main fescue species of emphasis has been Rough Fescue on the north facing grassland slopes and Idaho Fescue along with Bluebunch Wheatgrass on the south facing slopes. Deferred grazing has often been used to give Rough Fescue needed rest periods. Aggressive invasives have brought complications to the grasslands and grazing equation. However, I have been given to understand that at least until circa 2009-2010, those two fescues continued to be a focus of attention both in grazing practices and in invasive species control protocols.

I raise this matter because the CCP Grasslands section doesn't mention the fescues as keystone species to be given priority in determining range condition. It seems that a keystone species has been "lost" in the current landscape scale efforts to maintain the NBR grasslands.

Another reason for raising this topic is to add our voice to the matter of the proposal to remove interior fencing and stop herd rotations to avert overgrazing, especially in the spring period prior to calving. Given that the Draft CCP went so far as to indicate that fence removal would be undertaken – a very expensive practice that is hugely labor intensive, thereby demanding high levels of staff and funding commitments – fence removals should be done only when there is demonstrated that the existing fences are directly inhibiting sound grazing practices. And, given that the Draft CCP indicated that there are data indicating specific pastures have problems, it would seem that an alternative to simply removing fencing might well be to redesign the pastures using those data, coupled with the expected comprehensive health assessment, to improve the valuable existing functions of pastures in general. That could include moving pasture fences according to those data sets which might provide better overall capabilities for seasonal aspects as well as to provide improvements related to the native grassland complexes on North facing vs. South facing slopes.

And, finally, this section on habitat management, focused on the essential 14,000 acres of NBR grasslands, ***is a prime example of the failure to accomplish Preplanning for this CCP.*** Many commenters of the Draft CCP questioned the lack of preplanning and urged correcting steps be taken, but they were ignored. One must ask just how many additional documented management improvements, data sets, analyses, cautions and recommendations were overlooked?

The unacceptably low staffing level, worsened by reassignment of the experienced and knowledgeable Project Leader, endured without relief throughout the initial CCP activity obviously diminished on-board staff capability to properly glean refuge files. The regional planning staff, just as obviously, wasn't able during their periodic visitations to adequately assist that important requirement. The resulting failure to reasonably comply with Refuge Manual guidelines rests squarely on Regional leadership that denied the resources required to comply.

### **Conclusion**

As a representative of the Blue Goose Alliance, I appreciate this opportunity to review and make comment on the CCP/EIS released by Region 6 of the U.S. Fish and Wildlife

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Service. Although critical in some instances, these comments are intended to be constructive and based on direct field and administrative experiences of the author. Those experiences spanned a 24-year period of employment with the Agency and another 32-year period of close association while engaged as part of Non-Governmental Organizations devoted to seeking funding and important policy guidance for the National Wildlife Refuge System and federal Wildlife management on all U. S. publicly-owned lands. It is with great respect for the devoted and talented men and women in the service of refuge management and wildlife conservation that I offer both the criticisms and the suggestions.



William C. Reffalt, Vice President

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# THE FORESTRY KAIMIN

1915-1931

MONTANA STATE UNIVERSITY



Bison on the Range.

## THE MONTANA BISON RANGE

*By Frank H. Rose*

Defining an expert as "A man a long way from home," I pose as an expert on buffalo grazing. I took what might be called my undergraduate training looking through the Denver Zoo fence and for graduate work spent some time running from an old buffalo cow called "Snort" on the Wichita National Forest in Oklahoma. It is much easier to be an expert in a field without competition.

I came to the Bison Range at Moiese in the fall of 1923. It was not, however, for me to discover that this range was overstocked. I was told in Denver that it was an overgrazed game range and a splendid opportunity to attempt the solution of some interesting problems in grazing management as applied to game. I found the range rapidly going down with annual weeds and worthless grasses replacing the original native bunch grasses of the area. For six years after I took charge the Bison Range carried nearly twice as many animals as I thought it should support, chiefly because no satisfactory provision had been made for disposing of the surplus. It should be unnecessary to have to argue the need for disposing of surplus animals. This practice is always necessary on a fenced game range where protection permits a birth rate in excess of the losses from natural causes. The excessive stocking between 1923 and 1929 should in itself have put our range almost past redemption. That we were able to carry this surplus with so little damage was due to a number of things, chiefly spring feeding and the first rate cooperation of the weather bureau in sending us wet seasons when we had to have them.

I cannot say when the Bison Range was first overgrazed. Certainly parts of it were hurt before it was fenced for a game range in 1909. Probably from 1902 to 1907 was a period of

heavy utilization throughout this region. Before then great numbers of cattle were wintered on the Flathead Indian Reservation. It was not then the practice to feed hay in winter and some heavy losses were suffered by stockmen from starvation during hard winters. Old skulls of domestic cattle can still be found along Mission creek within the Bison Range area. These winter losses quite probably followed too close summer grazing of the original native bunch grasses, particularly *Scabrella fescue* and spiked wheat grass. Failure of the *Scabrella fescue*, the best grass ever known to the Northwest, has been attributed to a change in climate, a late freeze, a dry summer, hordes of grasshoppers, and to about everything except excessive grazing.

The Bison Range area, as originally selected by Dr. Elrod of Montana University, was purchased from the Indians and fenced in 1909 and the forty buffalo the National Bison Society gave to start our herd could not have grazed the 18,500 acres very closely. The buffalo increased from year to year and elk, deer and mountain sheep were added but the range must have improved steadily for a number of years. The summer of 1919 was dry, the driest in three consecutive dry years. I suspect that damage was done by the grazing game of the Bison Range at least as early as that year. All 1920 was wet and it was not until 1921 or 1922 that the records mention the range as not holding up. In 1919 there were 600 animals on the area, by 1921 these had increased to 750 and by 1922 to 890. The carrying capacity under grazing methods practiced at that time could not have exceeded the number on the range when it first began going down, and was less than the number on the range when over-grazing was noticed.

Most people probably think of ranges as able to carry whatever number of stock the feed that grows there each year will support and that nothing can be done about it. As a matter of fact, it is as possible to increase the yield of ranges by improved methods as it is to increase the yield of cultivated crops. For five years beginning in 1921 the greater part of our buffalo herd was penned and fed hay in the spring to hold them off the range while the grass got a start. How they were penned is another and wilder story, but the plan was an emergency measure based on Forest Service studies which show a greater total forage volume produced when the range is not grazed before the period of vegetative readiness (grass about six or eight inches high and beginning to boot) and when the stocking is reduced one half during the main growing season, here from April 1 to June 30. This was one method of increasing the yield and was immediately applicable. The earliest spring growth is slow, owing to low temperature, and is largely from food stored in the underground parts during the preceding season. When the weather finally warms up, a rapid growth continues as long as ample spring moisture is available. In this latter growth plant food is manu-

factured by the plant in the chlorophyll bodies of the leaves and other green parts. Since volume growth is largely limited to the period of available moisture and moderately warm weather and the plant food used for this growth must be manufactured by the plant during this period, the greater the vigor of the plant at the beginning of the period, the greater the total volume produced. A large factory can turn out a larger production than a small one. Actual measurements one spring on the Bison Range showed the growth the last week of April to be equal to the total accumulated growth of the seven preceding weeks. Since the grass at the end of April is only coming to the vegetative readiness stage, buffalo that graze on green feed before that time are seriously cutting down the leafage that should be available for volume production in May and June. Our spring feeding conserved this early spring growth and resulted in a maximum use of the early spring moisture when optimum growing weather arrived. The resulting increase in the yield of forage permitted us to carry our too large herds through the rest of the year without the sacrifice of our better forage species. Limited grazing on the other hand if not too early encourages many plants to stool out. It is not therefore necessary or desirable to keep all stock off the range through the entire spring season. We gathered only part of our herds and usually returned the yearlings and some others to the range in May.

During these critical years of our forage supply I may have appeared to be cold blooded concerning the animals under my care. I filled each authorized reduction 100 per cent and as each

old bull fell I saw not so much the sacrifice of a game animal but rather from two to four tons of forage plants saved to guard against a repetition with buffalo of the winter starvation losses of the early stockmen. How much better any game animal looks breast deep in forage than when seen in a bare corral. How much thriftier, too, is one given a wide choice of suitable feeds than one forced to subsist on forage ill suited to its needs.

Gradually by one method or another improvements were built on the Bison Range and the ani-



An animal breast deep in forage.

mals brought under control. Plans for the disposal of surplus animals were worked out and by 1929 our herds had been reduced to a number that I considered safely below the present carrying capacity of the area. Rotation grazing was then substituted for spring feeding. This year with a forage crop generally below normal we butchered no animals and our range looks so good that before you condemn our plan as wasteful I want to tell you what we are going to do with the dead grass carried over.

Rich soil is black from the decayed vegetable matter it contains. This humus not only enriches the soil, it tends to keep it friable and to give to it the property of absorbing water readily, and holding it tenaciously. Old stuff, yes, but it cannot be repeated too often. Before vegetation decays to become humus, it forms a mulch over the ground checking the force of beating rains by breaking the driven raindrops into droplets and more important still forms minute dams against the growing plants to hold flood waters until they can soak into the soil, thus increasing soil moisture, checking erosion, checking floods, and retaining the fine soil particles so necessary to plant growth. After the storm it shields the soil from the direct sun's rays and forms a dead air space next to the ground that reduces evaporation in the drying hot winds.

All this means so much to us. Our annual rainfall at the Bison Range averages fifteen inches. In our driest year it was over ten. The difference in rainfall between a dry year and an average one is less than one third and the run off from an overgrazed, thin-soiled hillside may easily be much more than this. The soil is still fertile on our semi-arid range and moisture is the most important limiting factor in forage production. So important is it that it is generally true that volume production is directly proportional to the available moisture supply. By building up our soil cover and humus content we hope to check and hold surplus moisture and in this way make an average year out of a dry one and a good year out of an average one. In my opinion production could in time be doubled by the application of moisture conserving methods on many, perhaps most, of the lower Montana ranges.

Scabrella fescue, the grass that kept the early Montana freighter's animals fat and able to work through the winters, requires moisture available through a longer growing season than the less valuable plants that replace it on impoverished soils. It is the first grass green in the spring and the last brown in summer and is sought after summer and winter by all our game animals. It will not survive under close grazing nor where the original black loam has leached to a pale gravelly clay. It will under moderate year-long grazing maintain itself against the invasion of foreign species and produce its abundant and highly

(Continued on page 76)

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(Continued from page 26)

nutritive leafage in quantities to provide grazing animals more palatable forage than is produced by the replacing short season grasses with ample left to catch and hold moisture, maintain the soil and build for the future. One shower will mature annual brome. In three to six weeks it may mature seed and with no other grass on our range our buffalo would have starved many winters ago.

Of the forty grasses that have been identified on the Bison Range, four or five make up 80 per cent of the palatable forage with Scabrella fescue the most valuable and the most unstable of these. A management plan that fails to consider the needs of this grass is inadequate for the Bison Range. Just as long as this fescue is maintained one of the dominant grasses of the area the Bison Range will be a suitable game range and winter feeding of buffalo will not become necessary.

If Scabrella fescue is permitted to fail, spiked wheat grass and Idaho fescue will in turn take the brunt of the grazing and they in their turn will fail, giving way to something less valuable. This is to be expected as buffalo, like the rest of us, take first what they like best so long as it is readily available. While they have free access to the entire area the highly palatable Scabrella fescue will be closely grazed during the growing season each year and if the range is stocked much beyond the capacity of this one of our forty grasses, it, by this repeated summer use, will be damaged while others show little or no use. It might even disappear almost unnoticed.

It was largely to guard against this excessive use of certain species that a system of interior fencing for better grazing control was started. One fence across the area completed in 1929 divided the Bison Range into two pastures. The buffalo were put south of this fence after grass started in the spring of 1930 and held until the area north of the fence was sufficiently advanced to seed. They were then moved north of the fence early enough to permit some growth on the spring fed area. While grazing this deferred north pasture they tend by trampling to scatter and plant such viable seed as were produced, a limited crop as it happened this year. The same rotation is to be practiced a second year to permit the new plants on the seeded area to establish themselves and then the order of feeding will be reversed. Feeding the area part at a time this way forces the animals to make better use of the less palatable species and permits the unhampered growth of the better species on a part of the range each year. With additional fencing we will refine our methods and not feed any area during the growing season in consecutive years.

Already a marked improvement of the forage conditions on the Bison Range is to be noted. Such original grasses as have

survived have gained in vigor, thickened up and extended their clumps and this year new plants are starting which if they become established should after a few years fill in the open spaces to the extent that moisture can be conserved to support growth. Although erosion and the removal of humus had started on our range, both before the area was fenced and again in the years following 1919 it has not proceeded far and the soil is still such that it can be readily rebuilt to sustain the better native bunch grasses and perennial weeds. With the range definitely on the mend the number of animals maintained upon it may be gradually increased to follow this improvement. Any such increase, however, must be carefully considered, for to exceed the capacity even by a few head will start the area again on the decline.

On ranges where overgrazing has been practiced over a sufficient period of years to materially change soil conditions complete range recovery is a long, slow, discouraging process. There is, however, no virtue in failure to recognize the condition for permanent improvement can only come through the consistent practice of constructive range management.

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Heard after an exam: "He ought'a give me something for being original, anyhow."

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## [EXTERNAL] Comprehensive Management Plan comments

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Mon, Sep 16, 2019 at 2:42 PM

To: "scoping\_NBR@fws.gov" <scoping\_NBR@fws.gov>

Hello.

I'm writing to express concern over the general lack of staff at the Range. I grew up in the area and worked at Bison Range as a teenager on a maintenance crew in the late 1990s. I am a wildlife biologist by trade and am all too aware of the general reduction in staff for refuges (and USFWS) nationwide. I believe that unless the public demands more money -> greater staff presence, there won't be any change anytime soon. As much, please consider this a request from a concerned citizen. The staff has been halved since I worked at the Range, and that means less management, less scientific studies, and less visitor engagement. The latter is largely what made me decide to get into wildlife research for a career - I attended summer day camps at the Range as a child. Less staff could mean a critical lack of future biologists (who need in the face of a changing climate and general disconnect from nature in our society). Please consider asking for more funding for full-time staff. Thank you.



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## [EXTERNAL] EIS comments

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Fri, Sep 20, 2019 at 4:53 AM

To: "scoping\_NBR@fws.gov" <scoping\_NBR@fws.gov>

I want to commend you on the excellent job you have done preparing the document and your public involvement process. I also appreciate the effort you went into in responding to the comments. I do have one serious remaining concern. Federal Register 15625, April 25, 1986 Section 1502.23 deals with Benefit -cost analysis which I am in agreement with your decision that a benefit cost analysis is not required. However, the last sentence of that paragraph does not exclude the necessity of providing the cost associated with the elements of the plan. For example the plan discusses a new visitors center. It would be helpful to have a preliminary cost estimate? You should be able to inform the public whether this is a million dollar structure or a 10 million dollar facility. There are many places in the plan where cost estimate would provide a better vision of what is being proposed and the merits of choices.

I was a Senior Economist with NRCS, USDA prior to retiring.

Sent from [Mail](#) for Windows 10



Fields, Vanessa <vanessa\_fields@fws.gov>

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## Fwd: [EXTERNAL] final comment

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Garza, Bernardo <bernardo\_garza@fws.gov>  
To: Vanessa Fields <vanessa\_fields@fws.gov>

Thu, Oct 10, 2019 at 2:10 PM

FYI

----- Forwarded message -----

Date: Tue, Oct 8, 2019 at 12:03 AM  
Subject: [EXTERNAL] final comment  
To: Garza, Bernardo <bernardo\_garza@fws.gov>

Hi Bernardo. We want to make this final comment that we hope will reach the Department of Interior Leadership.

We cannot emphasize enough the need for the National Bison Range and all associated units within the current complex, to be transferred to the leadership of the Portland Regional Office. This supports the Secretary's realignment structure and we feel it is only way that the National Bison Range and this and other long range planning documents for the entire Complex will ever be completed in a fair and unbiased manner. Given the history and past proposals, including the Denver Regional Leadership's proposal to remove the NBR from the National Wildlife Refuge System, we feel clearly demonstrates that they are incapable of thinking objectively about what is best for this refuge complex. Any associated stations, such as Lost Trail, have suffered collateral damage as a result of being associated with the NBR and all units must transferred as a whole to protect them. We feel strongly that this is the only way the NBR and its staff will be fully protected and finally be given equal and fair consideration and protection afforded to other members of the National Wildlife Refuge System.

Thank you,

--

**Bernardo Garza**  
**NEPA and Hunting & Fishing Coordinator**  
**National Wildlife Refuge System**  
**U.S. Fish & Wildlife Service, Mountain-Prairie Region**  
**Office (303) 236-4377**  
**Fax (303) 236-4792**



Fields, Vanessa <vanessa\_fields@fws.gov>

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## Fwd: FWP to pay for CWD testing statewide

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Jones, Lee

Thu, Sep 12, 2019 at 2:07 PM

Hi Amy,

I haven't had a chance to review the release of the NBR CCP/EIS for final public comment in detail yet, but I don't think that CWD was ever incorporated into this document in spite of being included in an internal draft circulated back in August. I know that this CCP is especially challenging to cram so many issues into the limited length allowed; however, with CWD in multiple areas of the state now, including lots of media documenting that the carcass of the first case ever detected in MT was inadvertently transported out of state, I strongly recommend adding just a sentence or two that references presence of the disease in the state, acknowledging that it is a state-led management program for which DOI agencies may provide support (and the Wildlife Health office has in fact have provided a good deal of funding to MTFWP for CWD work in the past few years) and providing a link or web address to the MTFWP CWD information website and MTFWP state CWD plan. When CWD is detected near the Bison Range in any cervid species, we will likely receive a tremendous amount of pressure to depopulate the NBR elk herd, so it would be prudent to establish the presence of this disease in the CCP now. I'm happy to discuss any of this in detail at your convenience. Thanks! Lee

Lee C. Jones  
Wildlife Health office  
USFWS-Natural Resource Program Center  
10 E. Babcock, Rm 105  
Bozeman, MT 59715

*For DOI personnel - please see <https://sites.google.com/a/fws.gov/fws-wildlife-health/>*

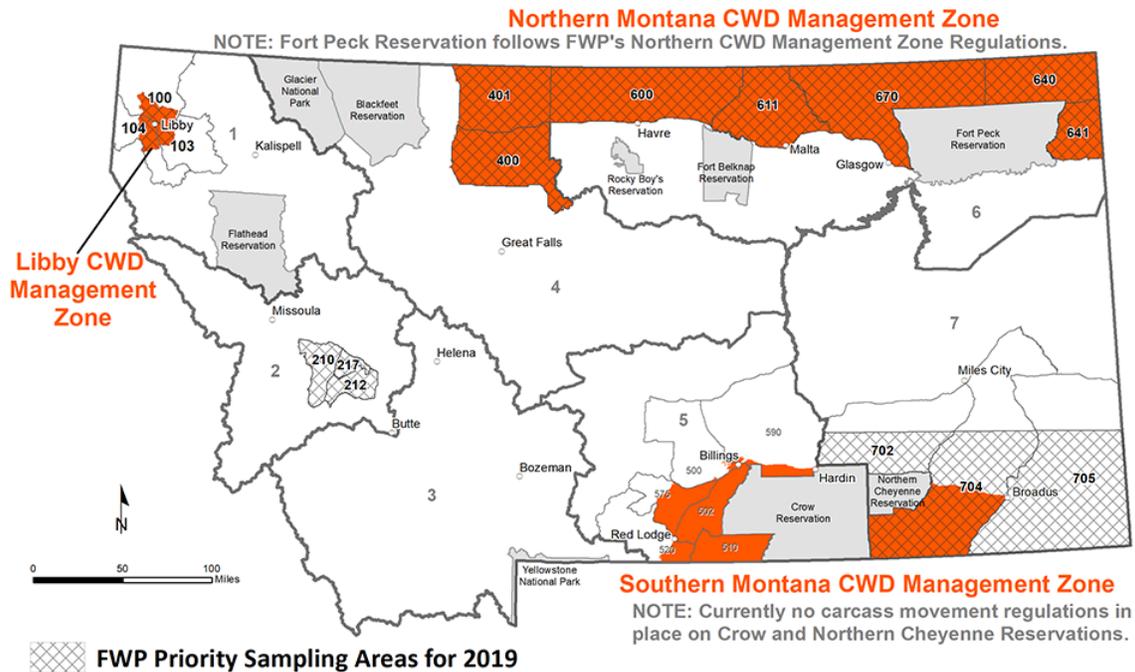
----- Forwarded message -----

From: **Montana FWP** <[montanafwp@public.govdelivery.com](mailto:montanafwp@public.govdelivery.com)>  
Date: Tue, Sep 10, 2019 at 1:13 PM  
Subject: FWP to pay for CWD testing statewide  
To:



THE **OUTSIDE** IS IN US ALL.

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## FWP to pay for CWD testing statewide

In 2019, Montana Fish, Wildlife & Parks will continue chronic wasting disease surveillance in high-priority areas in parts of northern, western and southern Montana, primarily from hunter-harvested animals. Hunters who harvest a deer, elk or moose in these areas should stop at a local CWD-sampling check station to have the animal sampled. FWP staff will collect samples and submit them for testing.

There will be Special CWD Hunts occurring during the general hunting season around Libby and in the southeast portion of hunting district 400. All animals taken in these Special CWD Hunt areas must be sampled. Visit [FWP.mt.gov](http://FWP.mt.gov) for details.

In other areas across the state, FWP will pay for sampling for hunters who collect their own samples and send them to the FWP lab in Bozeman. Here are the steps:

- Remove the retropharyngeal lymph nodes, located in the animal's throat area. A video is available on the [FWP website](http://FWP.mt.gov) that demonstrates the process.
- Fill out a Hunter Harvest Submission Form, which is available on the FWP website, and include a phone number and email address so FWP can send a **unique CWD number**. This CWD number is what hunters will use to look up test results online at [fwp.mt.gov/CWD](http://fwp.mt.gov/CWD). Be sure to record the location of harvest as accurately as possible. **Samples without location information will not be tested.**
- Put the lymph nodes in resealable bag, double bag the sample, and wrap the bag in a paper towel.
- Put the filled-out submission form in a separate resealable bag so it doesn't get wet and include it with the sample. If you are sending samples from more than one animal fill out a separate submission form for each animal and make sure that each form is with the correct sample in a sealed bag.

- Place the bagged samples, an ice pack, and the bagged submission form(s) in a small box or shipping envelope and send via your choice of postal carrier. FWP recommends using a carrier that offers tracking and can deliver samples within 24-48 hours to prevent the samples from rotting. Please try to ship samples on Monday, Tuesday or Wednesday of each week, and avoid shipping on holidays, to prevent the samples from sitting over the weekend.
- Send to:
  - Montana Fish, Wildlife & Parks
  - **ATTN: Wildlife Health Lab (CWD)**
  - [1400 S. 19th Avenue](#)
  - [Bozeman, MT 59718](#)
- Test results will be posted online within three weeks.

### Archery season

Check stations will not be set up during archery season, which began Sept. 7. For animals harvested during the archery season in one of our 2019 Priority Sampling Areas:

- Hunters can remove their own samples and bring them to a regional office for collection/submission
- If within the Northern Zone they can bring their carcass to Havre or Glasgow. If within the Southern Zone, carcasses can be brought to Billings for sampling.
- Head collection barrels and a submission kiosk will be set up at the FWP Office in Libby during the archery season

For more information, visit [fwp.mt.gov/cwd](http://fwp.mt.gov/cwd).

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This email was sent to [lee\\_c\\_jones@fws.gov](mailto:lee_c_jones@fws.gov) using GovDelivery, on behalf of Montana Fish, Wildlife & Parks  
1420 East Sixth Avenue, P.O. Box 200701 · Helena, MT 59620-0701 · (406) 444-2535



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Fields, Vanessa <vanessa\_fields@fws.gov>

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## National Bison Range CCP/EIS

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Mon, Oct 14, 2019 at 9:32 AM

To: "Fields, Vanessa" <vanessa\_fields@fws.gov>

Vanessa,

This email comment for the National Bison Range CCP is probably too late for consideration. However, I doubt that makes any difference since R6 leadership has ignored the efforts of all those who care about the integrity of the NWRS and specifically the value of the National Bison Range.

First, now that we have seen how poorly the leadership of R6 has protected the National Bison Range Complex it is my opinion all of the national wildlife refuge system interests located in Montana and west of the continental divide should be immediately reassigned to R1. R6 has a precedent for this type of action as it gave Boyer Chute NWR to R3 about 15 years ago.

Secondly, as we know, R6 will ignore my above comment. Therefore once R6 finally succeeds in ruining the National Bison Range and letting the CSKT manage the property, the name "National" should be removed from its title.

[Quoted text hidden]



Fields, Vanessa <vanessa\_fields@fws.gov>

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## National Bison Range Final Plan and Press Release

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Fri, Sep 6, 2019 at 2:17 PM

To: "Fields, Vanessa" <vanessa\_fields@fws.gov>, "Garza, Bernardo" <bernardo\_garza@fws.gov>

Dear Vanessa Fields and Bernardo Garza and the men and women of the CCP Planning Process of **the National Bison Range**,

Bless you both. Thank you, Vanessa, for sending the attached press release and final planning update to me SEPARATELY from the website regarding the planning for the **National Bison Range** as it is time-consuming for the media to download this. Time is everything for busy media so if they receive these PDF files they can upload them to their websites and social media easily without having to hunt for things on your U.S. Fish and Wildlife Service website, which they might not find.

I will send this to all my media contacts in hopes they will post these PDF files and do stories, broadcasts, and social media articles about the final Comprehensive Conservation Plan (CCP) for the National Bison Range that I have followed since 1994. Many of the USFWS staff that started with this issue have retired and many of my conservation heroes that started with me have died. The tragic case at the National Bison Range is a NATIONAL story because what happens at the National Bison Range is being applied to the management of federal money and staffing throughout the National Wildlife Refuge System and elsewhere in the federal land systems, which is why I have followed and written about this case for so long. Over these long years I have been grateful when some national media have picked up on this story but always grateful when Montana media has done stories on it in ANY fashion because federal land systems of ANY kind mean so much to me, as they do to both of you, and I know it.

As I have said before, I am an outdoor writer with 22 big-game and wildlife conservation books under my belt and am currently a national columnist for a magazine, Wild Sheep. I work with Montana and national media on veteran and wildlife conservation issues all the time and the media know me for my work, so they trust that what I send them is accurate, so you sending these PDF attachments helps get the word out about a very dearly beloved issue of mine, as you know.

Highly qualified federal workers at the local, regional and national levels have been fired, sidelined, and harassed for speaking up against ongoing agreements at the National Bison Range that violate many federal laws, which makes this issue equally tragic because current federal workers are afraid to speak and won't speak to the media that wish to interview them for the truth. In many, many cases, I have been willing to talk to the media when federal workers could not. Only after some federal workers retire do they

feel more willing to speak up and some do but that is wrong because they are defending the very federal laws that were put into place to protect our wild places that are national wildlife refuges, national parks and all other special federal lands we all love.

My husband, a wildlife biologist since 1973 who authored and edited more than 50 books, and I even hosted a public hearing in 2003 to try and get the word out about this tragic issue and to delay action by corrupt political appointments in the Bush Administration to advance efforts to turn over the National Bison Range to a sovereign Indian government, contrary to many federal laws. This effort continued under the Bush and Obama Administrations but stopped with Secretary of Interior Ryan Zinke when he reversed efforts to turn over the National Bison Range to the CSKT. Since then, the entire issue has remained in a holding pattern after Zinke was replaced and this entire CCP process has been a frustrating process for me and many others that worked to protect the entire National Wildlife Refuge System since this nightmare began with the passage of the Indian Self Determination and Education Act of 1994. That Act flies in the face of many levels of federal law set up in the early 1900s to protect national wildlife refuges and national parks.

I am fighting as hard for both of you as I am for ANY qualified federal employee of any color or belief. All I have ever wanted for the National Bison Range and the National Bison Range Complex is the BEST for all our federal land systems and the National Bison Range is a part of the federal land systems begun for far-thinking individuals from the late 1800s and early 1900s that saw our vast U.S.A. lands being destroyed and stopped the destruction by putting these lands under federal control with Civil Service workers who were not bound by political or family ties. These federal workers hired by the Civil Service Commission, like you and Bernardo, were hired because of your experience, education and knowledge, not for your political or family connections as was the system BEFORE the Civil Service Commission where workers were corrupt.

Theodore Roosevelt signed into law the Civil Service Commission to make federal workers professional and you are tow of them, Vanessa and Bernardo, as are the thousands of U.S. Fish and Wildlife Service, U.S. Dept. of Interior, U.S. Dept. of Agriculture and all the other federal agencies that are GENERALLY staffed by qualified scientists and professionals and technicians that are the ones I want running my federal public lands.

Trouble is, a limited few within these agencies has corrupted the agencies and allowed non federal workers to come into the system that works fine if people like you are selected through the Civil Service Commission system.

I am very troubled that the overall mission statement that begins the final CCP statement was not changed and the CSKT is included even though they are NOT the owners of the National Bison Range or the Complex. ALL Americans are, including members of the CSKT and the Flathead Indian Reservation who are American citizens, too.

With deep respect and appreciation but deep frustration that I wasted my time in the public meetings for note being heard, I say, the wildlife and its habitat cannot speak English so I must for them and I will.

We all must do what is best for THEM.

And, allowing non-federal workers to manage the positions and federal money outside of the Civil Service Commission and other federal laws does not help and only hinders our wildlife and its habitat. That in the long run is what I worry about the most.

[Quoted text hidden]

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## 2 attachments

 **National Bison Range Final CCP News Release - 9.5.19.pdf**  
170K

 **Final Planning Update\_NBR CCP\_September 2019.pdf**  
1916K



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
www.epa.gov/region08

OCT 0 1 2018

Ref: 8ORA-N

Mr. Will Meeks, Assistant Regional Director  
National Wildlife Refuge System  
c/o Bernardo Garza, Planning Team Leader  
U.S. Fish and Wildlife Service  
Region 6, Mountain-Prairie Region  
Branch of Policy and Planning  
P.O. Box 25486  
Denver, Colorado 80225-0486

Dear Mr. Meeks:

The U.S. Environmental Protection Agency Region 8 has reviewed the Department of the Interior Fish and Wildlife Service's April 2019 Final Environmental Impact Statement (EIS), CEQ No. 20190213, that analyzes the National Bison Range Comprehensive Conservation Plan (Plan), pursuant to Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA). The Plan establishes goals for managing habitats and wildlife, research, monitoring, cultural resources, public uses, partnerships, and refuge operations for 15 years.

The U.S. Fish and Wildlife Service has selected Alternative C as the Preferred Alternative. Our review focused on assessing the project's potential to impact water resources, and Alternative C appears to be the environmentally preferable alternative based on the ecological benefits. Under Alternative C, the Service will collaboratively develop and use a prioritization framework to identify and define future conditions. These identified thresholds will drive management actions to build ecological community resiliency, promote species and genetic diversity, and build sustainability into management capacity and operations. We support Alternative C as the Service moves forward with its final decision in the record of decision (ROD).

We appreciate the opportunity to participate in the review of the Final EIS. If we may be of any assistance, please contact me at (303) 312-6704, or your staff may contact Melanie Wasco at (303) 312-6540 or wasco.melanie@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Strobel".

Philip S. Strobel  
Chief, NEPA Branch  
Office of the Regional Administrator

October 6, 2019

Bernardo Garza, Branch of Planning and Policy  
U S Fish and Wildlife Service  
134 Union Boulevard, Suite 300  
Lakewood, Colorado 80228-0486

Dear Mr. Garza:

The following comments are submitted regarding the final Comprehensive Conservation Plan (CCP) and Environmental Impact Statement (EIS) for the National Bison Range.

Even though the CCP was finally completed well past the 15 year deadline, let's not overlook that it was only initiated as a result of the lawsuit filed by the Public Employees for Environmental Responsibility (PEER). Had it not been for the litigation I doubt any plan would ever been prepared. At any rate it provided a great opportunity for the Fish and Wildlife Service (FWS) to finally produce a quality plan for this 111 year old iconic refuge, but it was hastily put together to satisfy the settlement agreement conditions of the lawsuit and missed the mark with regard to potentially restoring greatness once again to the NBR.

The entire document reads more like a Confederated Salish and Kootenai Tribes (CSKT) CCP/EIS, as they are mentioned more than 130 times compared to half as many for the managing agency. There is no question that the FWS is obligated to work with, consult, and coordinate with Native American Tribes as well as other Government Agencies and neighbors, which has occurred at the NBR for years. The CCP/EIS could have been greatly improved and considerably shortened if for example on page 6 and 7 where the FWS Native American Policy (510 FW1 of 2016) is adequately addressed and details the FWS trust responsibilities of federally recognized Tribes. That said, by simply quoting the Native American Policy almost every specific reference to the CSKT in the document could effectively be eliminated or deleted as it is adequately addressed by this policy. The 2nd paragraph on page 11 is just one example by simply removing the CSKT and simply state "Recognizing its importance we will collaborate with Tribal Governments in a manner consistent with FWS Native American Policy, etc. etc." By eliminating the word CSKT the paragraph is still accurate and improved. The entire plan is filled with overkill of citing specific mention of the CSKT, which makes my point.

Again, I as well as many others have stated that, all references to Annual Funding Agreements (AFA's) should be eliminated or deleted from this CCP/EIS. Frankly put, AFA's are counter to partnerships, not only does the FWS lose considerable ability to manage and control crucial programs, but regulations and ambiguity (without a FWS AFA Policy) for negotiating and implementing these agreements has been the basis for

past failures and lawsuits. These failures have also not been without considerable costs and waste of scarce refuge dollars, as well as hardships on affected employees. Statements made by former Director Ashe and current Regional Director Walsh that, "if the transfer of the NBR to the CSKT fails there would be no more discussions or negotiations for any future AFA's. Sure Ashe is gone so we can't hold him accountable, but the NBR is still suffering from his ineptness, but Regional Director Walsh is still around and in the interest of transparency should be held accountable for her statement. Also, a FWS representative stated at the scoping meetings that there would be no AFA discussions for this CCP:. So once again the FWS has been less than candid, and all references to future AFA's should be removed from the final CCP/EIS. Work with Tribes would be more effectively carried out through the use of cooperative agreements initiated at the field level, without any regional office interference. This would allow for payment for tasks when completed, rather than up front, thus eliminating the potential for waste fraud and abuse.

The discussion on page 18 that any AFA would require the CSKT to operate the refuge according to the National Wildlife System Administration Act of 1966 as amended is grossly misleading and inaccurate, primarily because there is no legal basis for the CSKT to operate or co-manage the NBR, period. Doesn't anyone from the Denver Regional Office realize the reason why all the lawsuits were filed and were always lost by the FWS regarding this issue? Also stating that the environmental effects of CSKT operating the NBR would be identical to the impacts of the FWS performing these functions is also blatantly inaccurate. Anyone from the FWS that believes that there are no negative impacts for Tribal management of the NBR must have a bad memory or been asleep for the past two decades. One only needs to interview former managers Jeff King, Bill West, Steve Kallin, David Wiseman, Jon Malcolm Marvin Kaschke or Joe Mazzone who have a cumulative NBR management experience of well over 60 years. A number of commenters addressed the issue of co-management and its impacts only to see in the FWS response section that the Service disagrees. Just who is the Service in this statement? They might want to refresh their memory as to just why King, West and Kallin were forcibly transferred from the NBR. In addition a review of the Refuge Administration Act and other laws governing the National Wildlife Refuge System, may be in order, before making foolhardy statements like this. I would also suggest that the comments submitted by PEER and the Blue Goose Alliance be reviewed again and the final CCP/EIS revised accordingly, as they accurately and correctly addressed this issue, making your disagreement baseless.

We all know that rules and guidelines governing the preparation of CCP's require in-depth input and discussions with the general public and others. I find it highly unethical for the Denver Leadership to pursue and implement what is called the Western Montana Complex (WMTC) which includes the NBR in the middle of this planning process. No mention of this complex was ever raised or discussed during any of the scoping meetings, then vaguely appeared in the draft, without any public discussion. On page 18 of the final CCP/EIS it states that the new complex will be formed, which is another untruth as it already had been formed and the top positions are already in

place. Making Benton Lake NWR the Complex headquarters is also another lame idea because of it being located over several hundred miles from the Flathead Valley. The NBR would have been the better choice because of its central location. The general public should be allowed to see the cost analyses of this ridiculous decision, as it was never fully analyzed in this CCP/EIS, which just opens the door for a legal challenge.

Lastly there was no discussion of the Department of the Interiors latest reorganization effort, which would move administration of the Western Montana Refuges from Denver to Portland. Historically Government reorganizations make little sense, but in this case I wholeheartedly support moving the NBR to another region where hopefully it will again be properly administered and managed by professionals who treat every refuge as being important. Hopefully this transfer would finally put an end to the meddling and continual actions to relinquish control of this 111 year old iconic refuge.

My comments are not directed toward the regional planner or the current NBR refuge manager, but to the regional leadership, who continue to be less than transparent regarding the management and administration of the NBR.

CC Montana Delegation  
Senator Tester  
Senator Daines  
Congressman Gianforte

Attn:

Bernardo Garza; Amy Cabbman:

I'm re-submitting my comments on the CCP. Apparently they were misplaced considering none of my comments were addressed.

With no NEPA on complexing of Western Montana National Wildlife Refugees' Region 6 admitted that complexing can over rule the CCP. I think it will be legally challenged.

U.S. Fish and Wildlife Service  
Bernardo Garza, Branch of Planning and Policy  
134 Union Boulevard, Suite 300  
Lakewood, Colorado 80228

Dear Mr. Garza,

The following comments have been prepared on the draft Comprehensive Conservation Plan (CCP) and associated draft Environmental Impact Statement (EIS) for the National Bison Range headquartered in Moiese, Montana.

My comment is in part come from the 16 years I worked at National Bison Range maintenance Department. With a crew of four full time and 2 seasonal. It was a full time job to keep the National Bison Range up to refuge standards. I hope Fish and Wildlife Service will not lower those standards. As noted and by admission within the CCP, the proposed establishment of the Western Montana Complex is a significant planning issue. Rational decision makers would have chosen the National Bison Range for the complex headquarters, primarily for its location and having the infrastructure in place, as well as its historical status and resources for drawing the highest number of refuge visitors. Total disregard and adherence to the guidelines of NEPA is setting the table for another challenge in court, and as already stated the Region's track record is dismal in winning any litigation. Complexing of the National Bison Range should have been addressed and totally analyzing in each of the alternatives, as the argument that this is a dollar saving issue is political.

Environmental consequences. This decision of super-complexing the National Bison Range Complex Lee Metcalf Refuge with the Benton Lake Refuge Complex is the pentacle of arrogance with a total disregard of disclosing impacts as directed within the spirit of the National Environmental Policy Act (NEPA).

The Bison Range has been reduced to 4.5 on site staff, less than a third of the staff it had 15 years ago and less than half assigned only 5 years ago. These Bison Range-based employees are also responsible for the management of Pablo and Ninepipe refuges a long with several waterfowl production areas;

By contrast, there are 23 FTEs currently assigned to the Rocky Mountain Arsenal in Colorado, a refuge which is smaller in size then the Bison Range but with similar visitation and purposes for preserving plains bison. This disparate treatment at its best.

In its 111 years heritage the National Bison Range has never faced as much disregard for land wildlife and the public. This goes directly against the very reason it was created.

This is a result of the regional office in Denver over riding sound on the ground management.

It would be no wiser than to allow a banker to manage the ranch. Bankers bottom line is more important then the survival of the ranch. A fine example of poor decision making by the Regional Office. A brand new maintenance shop at the National Bison Range none operational before it had to be condemned. The \$800,000 building had no on job inspector to save money. Which is not standard procedure for such an investment. The building now broken in half and has sunk 7 inches. The answer from the Denver Regional Office is to tear it down and start over at the cost of over a million dollars. This could have been avoided.

These are the very Regional Leadership that be in full charge of financing the National Bison Range under complexing. and CCP.

Complexing with out added maintenance workers to do the qualify work is no more then a shell game. The added cost of windshield time perdeam and veical wear is compounded by loss of on site time. Maybe the regional office will make the staff report to a satellite refuge on there time and dime. When a refuge staff is detailed to a different refuge there work at home refuge goes undone, And when the complex refuge sends it's staff to help their work goes on hold. this is a very expensive shell game indeed.

I was told at more then one public meeting that complexing can change the CCP if the regional office see fit. Hard for me to understand how. Complexing can be trump. Since NEPA and EIS are required. then it should be required for complexing. The negative impacts will be to numerous wildlife resources and neighboring communities of each refuge within the Complex.

Partnership: I also want to point out that the FWS already has a very successful partnership with the CSKT, despite the absence of an AFA. Refuge employees and the Tribes natural resources department (NRD) prepared a joint grant to restore grassland habitats on the refuge. The grant, which can only be applied to federal lands within or adjacent to Tribal Reservations in nearly \$1 million dollars, most of which has been given to the Tribes to implement the restoration program designed by the FWS. Tribal employees have been removing invasive Douglas Fur trees in order to restore native grasslands, critical to bison and other refuge wildlife. The NBR also has a long standing and successful partnership with the Tribes fire management program. The CSKT are responsible for initial attacks of any fire on FWS lands within the Reservation boundary. These same individuals have assisted with prescribed burning programs, used to improve refuge habitats. It must be pointed out that these successful partnerships were negotiated at the field level with little or no interference from regional or national leadership, and attorneys on both sides.

Visitors Center: The discussion regarding the visitor center is also troubling, and seems to deliberately diminish the outstanding environmental education and interpretive programs that formally existed at the NBR. The Region's action not to fill any vacant visitor services position's and selectively keeping the center closed to the public during peak visitor periods in unforgivable and requires an in depth discussion. The CCP indicates a smaller visitor contract station will replace the visitor center under alternative A. Doing this will result in diminishing the environmental education opportunities and interpretive programs. This is definitely another deliberate efforts to diminish the NBR's once outstanding programs as well as necessary funding. This downsizing effort should be handled as a current management action under Alternative A. Also, the enhanced visitor services option to improve programs. It is confusing using the terms visitor contact station and visitor center together within this document, and clarification is needed. Here again the entire discussion regarding the visitor center and contact stations seems deliberate to reduce the NBR's funding and true potential for maintaining or expanding visitor use. This is yet another fine example of how the Denver Regional Leadership in charge can in vision what is best suited for not only there budget but also for the ecological preservation of the existing refuge. To move and build new is more than a waste of valuable resources. It is a unrevesable destruction of habitat. With a no square foot gain on the wildlife refuge. What good could come of that?

I hope the FWS, will use the comments they receive to the best of their abilities. With out increase qualified staffing and funding at the National Bison Range none of the alternatives will work.

I would urge the service:

- 1.no complexing
- 2.increase maintenance staffing by three

- 3.a partnership with the CSKT, pay as you go, no AFA
- 4.leave the visitor at Moiese and build office space as needed
- 5.alternative A will do the lest amount of damage to the National Bison Range

The Fish Wildlife Service should take note. If they do not make a wise choice in regards to the National Bison Range. They will find itself in court again. They have a poor track record so far. The Regional Office seems to try everything else before doing the right thing. If they screw this chance to do the right thing this time. Maybe a different region should replace region six.

October 7, 2019  
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Bernardo Garza  
U.S. Fish and Wildlife Service  
Branch of Planning and Policy  
134 Union Boulevard, Suite 300  
Lakewood, Colorado 80228

Dear Bernardo,

Please accept the following comments on the Final Comprehensive Conservation Plan (CCP) and Environmental Impact Statement (EIS) for the National Bison Range.

The following comments are provided \_\_\_\_\_ in response to the Service's request for comments on this final plan for the National Bison Range (NBR). Since we both were stationed at the NBR for over 9 years (even at the start of this CCP process), many of our comments were duplicative so therefore we have collaborated on these responses but both she and I agree with the contents. Before we provide our comments I think it's important to again describe our backgrounds and association with the National Bison Range and the Services CCP planning process and regulations.

In October 2018, I retired from the U.S. Fish and Wildlife Service (Service) after serving as the GS-14 Project Leader for the National Bison Range Complex for over 9 years. The National Bison Range Complex is composed of the National Bison Range, Lost Trail National Wildlife Refuge, the Pablo National Wildlife Refuge, Ninepipe National Wildlife Refuge, and the Lake County and Flathead County Wetland Management Districts.

I was brought to the NBR Headquarters in October 2008 to specifically implement the second Annual Funding Agreement (AFA) negotiated with the Confederated Salish and Kootenai Tribes (CSKT) so I consider myself an expert on not only on negotiating and implementing AFAs but the laws, rules, and regulations that govern their use on National Wildlife Refuges.

I am one of the longest serving project leaders in NBR history and I am intimately knowledgeable about the resources, issues, and opportunities that this amazing but challenging refuge can provide to the American public. I am extremely proud of the time I served as the Project Leader, not only because of the amazing and unique public resources we managed, including the mighty plain bison, but the staff I worked with, who despite being dismissed repeatedly by the very leaders who are tasked to protect them, continued to do their job and fight for the resource that they loved.

Both \_\_\_\_\_ and I provided extensive comments on the draft CCP/EIS. While some minor changes were made, which we appreciate, the most significant flaws in this plan were left intact. In an effort to carry forth the concerns she and I shared previously, we are restating many of these same flaws so they are carried forward in the record. As stated previously, this final CCP/EIS sets the refuge back by decades. It's a sad and missed opportunity and once again

the Regional Office Leadership in Denver has left the NBR the crumbs. This amazing resource, loved by the American public has and always will deserve better.

In September 2018, I retired from the U.S. Fish and Wildlife Service after 28 years. During my tenure I served both as a refuge manager and a GS-12 Refuge Program Specialist assisting National Wildlife Refuges with their CCP planning processes. I served as a planner in Region 6 for 15 years.

I consider myself an expert in refuge planning and NEPA and the practices and standards of prior CCP efforts in Region 6, the region in which the NBR is located.

### General Comments

While we appreciate that you made some minor changes to the plan based on our comments, the most critical comments, which affect the validity of this plan and leave the U.S. Fish and Wildlife Service vulnerable to legal challenges, were completely ignored. The justifications for not making these critical changes are weak and sometimes confusing. Other times, the answers are wrong (e.g. claiming you did adequate preplanning).

Since we provided voluminous comments for the draft review, we are simply going to restate some of the most critical comments we provided. We highly doubt that Denver Regional Leadership will make any changes based on these comments; however, we feel it is important that they again be highlighted and entered in to the record for this review of the final CCP/EIS.

1. The Vision Statement, which serves as the foundation for any planning effort, essentially remained unchanged. We will restate our comments and suggestions that we provided for the draft review.

The leadership in Denver needs to look at the planning policy (602 FWS3) and read what a vision statement is. It says

*“The vision statement should focus on what will be different in the future because of our efforts, capture the essence of what we are trying to do, and why. It should be future-oriented, concise, clear, compelling, and give a sense of purpose to our efforts.”*

The vision statement does none of this. It is flowery statement that doesn't say much of anything about the unique characteristics or future of this truly unique and historic refuge that is loved by the public. Except for this statement (*inter-montane valleys of northwestern Montana shaped by glacial forces*) and the statement about the Flathead Indian Reservation, you could put this vision statement in any refuge complex plan and it would be fine—it would still be a poorly written vision statement, but it's so generic it fits anywhere.

We do not know why you wrote a vision for the refuge complex. Remember, this CCP only mentions the NBR. When you decided to do a stand-alone plan for NBR you should have written a vision statement only for NBR and it would have been much more meaningful and useful and followed policy on the importance, content, and values of vision statements. We are concerned that this weak vision statement will simply be put in to other CCPs that will be

completed for the remaining complex. This will perpetuate the impacts of this poorly written statement. Again, we are providing examples of other Region 6 vision statements to clearly demonstrate that Region 6 staff knows how to write a vision statement based on standards and policies. All we are asking is that the NBR be given the same effort.

#### Rocky Mountain Arsenal CCP/EIS (another Region 6 bison refuge):

*As the sun rises, bison thunder across the prairie, red-tailed hawks soar overhead, and the urban bustle begins. Lands once known for their agricultural and industrial uses are being restored on the Nation's premiere urban wildlife refuge, where time moves at nature's pace and wildlife have the right-of-way. Propelled by public and private partnerships, refuge stewards at Rocky Mountain Arsenal, Two Ponds, and Rocky Flats National Wildlife Refuges continue to work to repair and regenerate wildlife habitat. These prairie oases nestled within Colorado's Front Range communities welcome visitors from near and far and foster an appreciation for nature. They will connect people with the land for generations to come.*

#### San Luis Valley National Wildlife Refuge Complex CCP/EIS

*The San Luis National Wildlife Refuge Complex, set in a high expansive desert valley, is cradled between the snowcapped peaks of the San Juan and Sangre de Cristo Ranges. Mountain snowmelt feeds the Rio Grande, numerous streams, and a dynamic ground water system, creating a diverse mix of playas, wet meadows, and willow and cottonwood riparian corridors that are in stark contrast with the surrounding arid landscape. As reflected by 12,000 years of human history in the valley, the refuge complex attracts many people. Visitors experience the ancient song of the sandhill crane, witness evening flights of thousands of waterfowl, and listen to bugling elk. Through ever changing conditions like climate change, the refuges support and foster a collaborative spirit between their neighbors and partners to conserve the valley's treasured resources.*

#### Charles M. Russell National Wildlife Refuge CCP/EIS

*Charles M. Russell National Wildlife Refuge's expansive badlands, cottonwood river bottoms, old-growth forested coulees, sagebrush steppes, and mixed-grass prairies appear out of the sea that is the northern Great Plains. Encompassing more than a million acres, the refuge affords visitors solitude, serenity, and unique opportunities to experience natural settings and wildlife similar to what Native Americans and, later, Lewis and Clark observed. The diversity of plant and animal communities found on the refuge stretch from the high prairie through the rugged breaks, along the Missouri River, and across Fort Peck Reservoir. The refuge is an outstanding example of a functioning, resilient, and intact landscape in an ever-changing West. Working together with our neighbors and partners, the Service employs adaptive management rooted in science to protect and improve the biological integrity, biological diversity, and environmental health of the refuge's wildlife and habitat resources.*

Suggestions:

If you do choose or are forced to rewrite the vision statement, we suggest adding some important features of the National Bison Range for example

- Bison and their unique genetics and their future conservation with other DOI and Tribal herds (e.g. unique bison genetics).
- The fact that the NBR has one of the largest intact intermountain grasslands in the Nation, one of the most endangered habitats across the West.
- Mention some of the many native plant species such as perennial bunch-grasses, Idaho fescue, and bluebunch wheatgrass, along with abundant wildflowers exploding across the rolling hills in the spring. This highlights the unique native component that you have proposed to protect and enhance.
- You could have also mentioned the refuge as an Ambassador for the Refuge System, since over 80% of all annual visitors are coming to the NBR for the first time, many from targeted Urban areas and other Nations—giving the Service thousands of opportunities to tell the story of the NBR and the NWR System.
- You could mention the American Bison Society, since they had the original vision for this refuge.
- How about the fact that the Plains bison is now our National Mammal?

We could go on and on since it's easy to have vision for such a unique and special place with such a rich history.

2. We want to re-enter in to the record that neither of us were permitted to review or comment on the alternatives developed by the planning team even though we both were working for the Service and had extensive experience both in managing the refuge and in refuge planning. We now understand why. We would have vehemently objected to the alternatives, including the No Action Alternative. Simply put, this critical No Action alternative is false and was designed to give the public the appearance that the Service was adding staff and positions to the NBR through this planning process. You did not, in fact more positions were removed or downgraded then what was present in the approved 2016 organizational chart, which was in place at the start of the CCP process. This is simply unprecedented in any of the other CCP processes done in Region 6. While other regional plans reclassified or even removed positions that no longer served future management objectives, those released resources were used for other station priorities identified in the CCP to further expand capabilities, not permanently remove them. In no case has the Service ever removed positions during a CCP process and then added them back under a proposed alternative, pretending they are new positions. You are being dishonest to the public.

A perfect example is the GS-11 supervisory visitor services manager and the GS-11 wildlife biologist positions proposed under alternative C, the preferred alternative. First of all, there has been a GS-11 supervisory visitor services manager stationed at the NBR for decades-this is not a new position. It would be completely unthinkable to not have a visitor services manager on a high visitation refuge like the NBR, which has over 200,000 annual visitors coming to the Complex. It should also be noted that this has been the only permanent visitor services staff person on the complex for years. The other two high visitation refuges (Rocky Mountain Arsenal and Elk Refuge) have GS-12 visitor services managers and several on-site permanent support staff. This disparity between these refuges and the NBR should have been addressed and corrected in this planning process—it was not. The opportunities are endless if the NBR were

provided adequate visitor services staff to design and offer programs to the public. The location and resources are an amazing draw to the public and gives the Service the opportunities to tell the story about the NBR and the NWR System as a whole.

The GS-11 wildlife biologist position proposed under Alternative C had been a GS-12 supervisory wildlife biologist for many years. The plan makes no mention of this well established GS-12 position; instead they imply under the preferred alternative that a 'new' GS-11 wildlife biologist has been added to implement this alternative. Also, in alternative C you will be removing both the GS-9 fish and wildlife biologist position and the GS-9 wildlife biologist and replacing them with a single GS-7 biological science technician. Even though you have removed a supervisory biologist position and downgraded two others, your alternative proposes to expand and emphasize the biological program over the next 15 years. Typically when a certain refuge program (e.g. biology or visitor services) is expanded in a CCP, associated leadership and support staff positions are retained and typically, more are added. Once again, the NBR CCP is treated differently than any other plan previously done in region 6 and your proposals cannot be implemented and monitored with the proposed staffing structure.

In October 2017, after raising numerous objections about the CCP process and the critical lack of staff and funding for the NBR, we were both forced in to involuntary Regional Office details, which included forbidding us from having any interactions with the NBR, including this CCP process. Within a matter of days, Denver Regional Leadership arbitrarily altered the organizational chart, removing 6 long standing positions from the NBR staffing structure and leaving only 5 employees assigned exclusively to the NBR station. The remaining CCP planning team members were directed to use this new staffing structure as the baseline upon which all other alternatives would be compared. This was done in November 2017, 6 months after the CCP process had already started. This gave the public a false 'baseline' (No Action) on which to consider the other alternatives. It is true that many of these positions were unfilled at the time; however that wasn't because they weren't needed or that the funding wasn't there. The positions were only vacant because the funding was being withheld during the 2010-2015 Annual Funding Agreement (AFA) negotiations with the Confederation Salish and Kootenai Tribes (CSKT) and the associated NEPA analysis (which both and I were intimately involved in). This limbo continued another year and half when the Service then proposed to transfer the NBR in to a trust for the benefit of the CSKT. Even after both of these initiatives failed, the Denver Regional Leadership did not restore any of these vacant positions, despite commitments made to the NBR staff to do so. These were long and painful processes, and when combined, lasted almost 7 years during which time the organizational chart remained unchanged, leaving unfilled positions intact and funded (even though funds retained in the regional office), but vacant. This limbo had dramatic effects on the staff, resources, and visiting public, including missed opportunities to improve conditions for wildlife and the public.

During the 2015 AFA negotiations these same vacant positions and the associated operating funds were offered to the CSKT as part of an AFA proposal. In addition, another 5 new positions (not included on any approved organizational chart) were offered in this agreement for a total of 16 NBR staff. If these positions were needed a mere two years prior to the start of the CCP process, how can the Denver Regional Leadership arbitrarily and drastically eliminate all but 5 of these positions (almost all higher graded leadership positions) without any justification or input from or other staff intimately knowledgeable with the needs of the NBR Complex. The Regional Leadership did not eliminate any programs other than keeping the visitor center closed during high public use times. Also, these 16 staffs included in the AFA proposal were only assigned to work on the NBR, Ninepipe, and Pablo National Wildlife Refuges. This clearly demonstrates that even Denver Regional Office Leadership recognized the need for additional

staff to manage the complex NBR operations and yet they chose to dismiss these same critical needs in such an important 15 year-long range planning document.

We see in this most recent document that the Denver Regional Leadership has defended their No Action alternative by stating that it supports the Region 6 realignment strategy. We will discuss this and the history of how the NBR was treated in the preparation of this document in our subsequent comments; comments we provided for the draft plan review as well.

The 2016 organizational chart, in place at the start of this planning process, should have served as the baseline (No Action Alternative) for this plan. The staffing baseline outlined in the No Action alternative makes any new proposals void and misleading to the public. It also sets in stone the critical loss of staff that is not sustainable and certainly cannot support any of the proposed alternatives, including the No Action (current management).

3. We want to include in the record the recent article published in the Missoulian on June 23, 2019, titled, "Failing and Struggling: How financial decisions hobbled the National Bison Range." This 10 month investigation clearly demonstrated that the Denver Regional Leadership was deliberately withholding NBR operating funds for years, critical funding that was needed to protect the public and the resources of the NBR. By the time the transfer proposal was ended by Secretary Zinke, the Regional Office had already distributed all the critical staffing and funding needed to properly manage the NBR to other stations and programs. During this time, they were treating the NBR like it had already been transferred and refused to provide for any additional staff or funding despite numerous requests from [redacted] for added help. Here is the link to that article that cited numerous documents obtained through FOIA requests sent to the Denver Regional Office.

[https://missoulian.com/news/state-and-regional/failing-and-struggling-how-financial-decisions-hobbled-the-national-bison/article\\_a6cafaf0-bb94-5d9b-9f84-f8d55cad9b74.html](https://missoulian.com/news/state-and-regional/failing-and-struggling-how-financial-decisions-hobbled-the-national-bison/article_a6cafaf0-bb94-5d9b-9f84-f8d55cad9b74.html)

We believe this well researched article, based on documents obtained from the Region 6 Division of Refuges, supports our earlier statements about the Denver Regional Office leadership deliberately withholding and then transferring critical operating NBR funds and staffing while claiming that funds were not available or allocated by Congress for NBR programs and facilities.

#### 4. Region 6 Realignment Strategy Staffing Framework

This entire CCP is based on the Region 6 Realignment Strategy Staffing Framework; however, this framework had yet to be tested or implemented at the NBR and most other stations in the region when the CCP was initiated in May 2017. Prior to our retirement, there were even discussions that this regional proposal to redistribute staff and funding would become null and void with the Secretary's regional realignment proposal, which would have moved stations like the NBR to the Columbia Watershed Region under the direction of the Portland Office. We feel that using this framework as the basis for the No Action proposal is wrong and misleading to the public; particularly since the NBR was not even given any consideration until after most of the positions and staffing had been allocated across other refuges (see below). Also, the realignment framework, which almost certainly alters approved Region 6 CCPs that went through extensive NEPA processes, most certainly conflict with many of the objectives and strategies outlined in these previously approved plans. Nevertheless, the Region 6 realignment framework and staffing restructuring did not go through any NEPA or public review process.

Also, this framework document clearly states that:

*“...this staffing framework is deliberately designed as a guidebook, not a cookbook.”*

Nevertheless, the NBR CCP was prohibited from deviating from this so called ‘guidebook’. Instead it was used to set in stone the proposals in this framework, which stunts any opportunities for expanding refuge management programs and public use opportunities over past efforts. Although the CCP does contain some good proposals, it is completely unrealistic because this ‘guidebook’ was used as the sideboards for any planning proposals, particularly the future complex structure and staffing, which are the very heart of any good planning effort. Only so much can be achieved through partnerships. Quality Service staff are the backbone of any refuge program and this plan does nothing to improve the staffing conditions of the NBR; but rather sets it back by decades.

This realignment strategy is based on budget restrictions and limitations today and could be altered at any time, allowing new opportunities for funding and staffing offered by future congressional appropriations and priorities. It could also be as simple as a change in Service National or Regional leadership who no longer support the proposals in this plan. There are numerous examples of these types of Service led initiatives that have died on the vine with changes in priorities and administration. Despite these facts, the entire NBR CCP was hamstrung by this regional strategy document; a strategy that had yet to be tested or implemented to determine its effectiveness. This becomes even more concerning considering the fact that the NBR was excluded from most of the region-wide planning that determined how available regional refuge staff and funds would be distributed across all stations. This planning included the creation of some ‘mega-complexes’ spread over hundreds of miles, including the new Western Montana Complex (WMTC), which now includes the stations managed by the NBR Complex (NBR, Pablo, Ninepipe, Lost Trail national wildlife refuges).

Most of this realignment framework planning took place while the Service was planning to transfer the NBR out of the National Wildlife Refuge System and so and the other refuge managers were told by Chief of Refuges Will Meeks to completely ignore the NBR when determining how staff and funding would be allocated amongst the different zones in the region. The justification for this decision was the fact that the Service had encouraged the CSKT to actively work on legislation to transfer the NBR to them in to a tribal trust and out of the National Wildlife Refuge System. It was not until it appeared that the transfer proposal would not be successful (March 2016), that the NBR’s name was arbitrarily added back to the realignment document by simply adding it to the Western Montana Complex. They did this without any added positions despite the fact that in December 2016, and his then refuge supervisor Mike Blenden did come up with some proposals for positions that could be included in the realignment document were the NBR to remain in the National Wildlife Refuge System (e.g. GS-12 Visitor Services Manager and GS-12 Range Conservationist). However, even after forwarding these suggestions to the Denver Regional Office leadership, it appears they were ignored and not added to the WMTC or considered during the planning process.

This CCP/EIS does state that 8 positions were added to the WMTC but it is unclear where those positions were actually placed and based on the staffing structure under alternative C, we do not see where the NBR benefited from these additions. All of these additions appear to be placed in the other stations in the WMTC (although we couldn’t find where this is described). The operations of the NBR are so unique and require special skills to safely manage a herd of plains bison that simply rotating staff from other stations is ineffective and could be potentially dangerous if they are not adequately trained and experienced.

This new mega-complex spread across hundreds of miles and several different watersheds, is now headquartered out of the Benton Lake National Wildlife Refuge office, 4 hours away in Great Falls. The newly recruited GS-14 project leader, moved to Benton Lake, is now responsible for not only the Benton Lake Complex (which was also designated as a stand-alone GS-14 project leader position), but all the units in the NBR Complex and another popular public use refuge, Lee Metcalf, out of Stevensville, MT. Knowing intimately the challenges of just managing the NBR, including all the political wrangling that regularly occurs, on top of managing one of the most complex management programs in the Region, including adding the NBR to this proposed WMTC, is simply unworkable.

We do know that an on-site manager (now downgraded from a GS-14 to a GS-12) been placed at the NBR. This individual was recruited at two grades lower than the two previous project leaders (including the position occupied) and will now have to answer to an off-site GS-14 project leader who is located at a least a half days drive from the NBR. This new project leader, headquartered hundreds of miles away, will almost certainly be unfamiliar with the day to day operations of the refuge, the intricacies of the refuge programs, managing large mammals and their habitats, dynamics of the local communities, and the challenges of managing a high visitation refuge, yet they will have the final say on what is best for the NBR. Again, this is unprecedented in the 111 year history of this refuge.

This NBR manager position was regularly classified as a GS-14 position and unless the Service's classification system has dramatically changed, we question how this position could have been suddenly been downgraded two grades when the NBR program has never been more complex. Also, the Lost Trail NWR (part of the NBR complex) was previously managed out of the Benton Lake office and it was disastrous, given the distance and lack of knowledge of the resources managed on Lost Trail. During tenure, the Denver Regional Leadership restored Lost Trail to the NBR Complex because of these significant management structure problems. It's unfortunate that the current Denver Regional Office leadership refused to learn from the mistakes of the past (despite objections from and others) and instead expanded the impacts of this poorly designed management structure.

It is also important to note that given the fact that the NBR CCP was put off repeatedly, it is now the only refuge in the region that is now restricted by the proposals in this 'guidebook', a document designed to address the limited resources currently available for the National Wildlife Refuge System today. If the NBR CCP had been initiated even a few years past the congressionally mandated 2012 deadline, the refuge would not be limited by this regional proposal and would be permitted the same opportunities other refuge planning teams had to think broadly about what was best for their refuge. Unfortunately, in 2015 the Service initiated the transfer proposal and refused to allow the refuge to do any of the congressionally mandated CCP planning. The domino effects of all these poor decisions have resulted in the plan you now present as a final.

As described in her background section, is an expert in NEPA analysis. In her opinion the management structure proposed in the realignment framework could cause significant impacts to the quality of the human environment and should have been evaluated in this plan and any future CCP revisions. Also, it must be evaluated and made clear whether the proposals, including staffing, for this new complex plan conflict with CCPs that have already been completed for Lee Metcalf, Lost Trail, and Benton Lake National Wildlife Refuges. These plans have already gone through a separate NEPA process and vetted with the public and should take priority over this arbitrary regional staffing restructuring plan.

## 6. Review period for this final CCP/EIS limited to 30 days (or is it?)

requested that the public be given an extra 15 days to review this final plan. In prior CCP/EISs Region 6 gave the public a minimum of 45 days vs. the 30 offered for the final review of this NBR CCP/EIS. In the 15 years that worked for the Region 6 Division of Planning she never recalls regional leadership refusing to give additional time for the public to review a plan. The planning staff were always encouraged by the public's desire to provide their input in to the planning process and we always provided extra time if requested and welcomed and encouraged dissenting opinions. Also, if no decision had been made, we always accepted any comments that arrived after our deadline had passed. Public outreach was always a critical part of the process.

Again, the NBR is the exception to the rule. It took 5 days of the 30 day review period for the Denver Regional Office Leadership to respond to her request for an extension and the answer was, No. There was not even a compromise offered, just No. They even stated that the solicitor's office was consulted. This too is unprecedented and simply absurd. Regional office leadership has the ability to offer such extensions without seeking legal advice. This whole thing is particularly strange since Chief of Refuges Will Meeks also recently sent out letters stating that there is no deadline for comments until the Record of Decision is signed and the plan is implemented, which could take another 30 days. This letter was only recently received by certain members of the public, at the end of the public review period.

We believe the answer she was given was in an effort to silence the dissenting opinions that we now share. Again, this is unprecedented and it is evidence that even the Denver Regional Office Leadership has concerns about the validity of the proposals in this plan; otherwise, they would welcome a thorough (and extended) public review of this very important document prior to it being approved and implemented.

## 7. Horseback Trail Ride

Please review the previous comments about the horseback trail ride made by during the review of the draft plan. The CD you prepared on page 140 describes the exact restrictions and stipulations that were present when he and other staff in the Regional Office found this event an inappropriate and incompatible use of the National Bison Range. This was not based on personal opinion but on facts both rooted in the laws governing compatibility policies, past history of this event, including serious injuries of both riders and refuge staff, a lack of staff to properly manage and monitor this event (you are proposing to have even fewer staff in this plan), and the introduction of weeds on the refuge, despite the requirement that all horses be fed weed free hay. This last stipulation was impossible to manage. Also, the refuge has a 19-mile long tour road that provides an unprecedented opportunity for visitors to view and photograph wildlife, at great cost to the Service to manage and maintain. These and other factors surrounding this event made it clear that it was an inappropriate and incompatible use of the National Bison Range.

I see no justification for overturning the inappropriate use determination made by myself and other staff in the Denver Regional office not even a decade ago and if you allow this event to proceed, you will be vulnerable to legal challenges.

8. Since both of us were stationed at the NBR years prior to the CCP being initiated in 2017, we can both state that any preplanning efforts completed by us and others were woefully

inadequate to serve as a basis for this CCP/EIS planning effort. Based on your own planning steps listed, you only had 4 planning meetings with the planning team, which is not even minimal for a complex CCP/EIS. We see no evidence of biological or visitor services workshops where refuge data is scrutinized or summaries of research data collected from the many universities and private research groups are evaluated. The Parkers Data you frequently reference was never fully analyzed and frankly this is an antiquated and ineffective method for analyzing range conditions yet you proposed to continue using it. This is just one of many examples of poorly thought out proposals that clearly show a lack of preplanning and analysis for such a complex plan. Frankly you did not have enough staff to adequately complete this critical step, even something as simple as developing an effective mailing list, a simple yet essential step in this process was completely missed.

### In Conclusion

There is certainly more we could say but we feel between our comments on the draft and these statements we have covered some of the most glaring concerns that we have; however, the additional time we requested (and was denied) would have given us the opportunity for a more thorough review and opportunity for more thoughtful comments.

The years we served at the NBR were some of the best and most challenging times of our careers but we always put the resource and the public first and it is in that light that we offer these comments. We want the National Bison Range to thrive and we want it to be there, in all its glory, for future generations to explore and enjoy. It is a unique and amazing icon of the National Refuge System and it deserves our best effort to ensure it will be here for the next 111 years and beyond.



Fields, Vanessa <vanessa\_fields@fws.gov>

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## Phone comment today

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Fields, Vanessa <vanessa\_fields@fws.gov>

Tue, Oct 1, 2019 at 3:13 PM

Hi everyone-

I received a comment today on the CCP/EIS via phone call today. The commenter was \_\_\_\_\_, a resident of Missoula.

He had questions or concerns about several items. He had not had a chance to read the plan and had not commented earlier in the process. He brought up:

1. Concern over noxious weeds. He emphasized the need for early detection and rapid response along roadways especially.

2. He mentioned concern over the pronghorn numbers and also said he visited the refuge a few years ago and saw pronghorn with flagging on their horns. He was not happy about seeing the flagging.

3. He expressed concern about the big horn sheep numbers as well. He hopes that the refuge will continue coyote control.

4. He said that it seems the buffalo and elk are doing well.

He also shared how much he enjoys the refuge and has been coming to visit for many years. He is 73 years old and remembers seeing Big Medicine as a child and how special that was.

I shared with him how we are addressing these issues in the preferred alternative in the Final Plan. He was glad to hear what we are planning to do. He asked to be added to our mailing list, which I will do.

Let me know if you have any questions. I will add this email to our comments file.

Thanks,

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Fields, Vanessa <vanessa\_fields@fws.gov>

## National Bison Range CCP/EIS

Thu, Oct 3, 2019 at 10:32 AM

To: "Fields, Vanessa" <vanessa\_fields@fws.gov>, amy\_coffman@fws.gov

Vanessa and Amy,

My comments to the draft are brief. Brevity doesn't mean I am not passionate about the topics. You folks are now the pilots of NBR. I caution you not to throw out learning from past 110 years for sake of the paper you site as justification, ie, Briske, et.al. (2008) I agree that in 1992 the grazing rotation system established in 1988 by 13 year Refuge manager Jon Malcolm was modified by himself because it wasn't working. I don't agree that rotation was no longer implemented at NBR. The three southern pastures were converted to winter grazing in 1992 with gates kept open. Rotation was still maintained/implemented on all northern pastures until I left in 2008. Bison were moved to south units in fall 2008 so any abandonment of rotation took place next spring 2009. It is my understanding that rotational grazing was not being implemented because there were not enough skilled riders to move the bison. Not a very scientific reason to change management. Hanging your hat on Briske when you have abundant data of your own, specific to NBR, is something I can not understand or support. Removing the fences between the three southern pastures seems reasonable adaptive management move but not elsewhere. It is my memory that entanglement of wildlife was happening between upper west and lower west pastures. Those units need to be separated or bison will camp out in Pauline riparian or on top of wild horse mesa.

I am glad to see the changes in the CCP saying you will move slowly and develop HMP after "robust analysis". I encourage you not to jettison the idea of protecting habitat from overgrazing during the spring growing season. That is the primary goal of rotational grazing systems. Passive methods of encouraging reasonable grazing by bison during spring growing season may, in reality, be more demanding of employee FTEs than is maintaining a fence. Just opening gates is passive and may work some but not always. I support the concept of slow adaptive management of interior fence but not the vision that bison will heal the land just because they are not cattle. If pastures are too large for current bison herd size to benefit habitat by short duration/high intensity grazing then smaller grazing units are needed not removal of fences. Larger. Bison are not known to have evolved with the grassland types found at NBR (Palouse Prairie).

You might move away from grazing rotational practices fully supported and championed by USFWS, NRCS, Montana DNRC, BLM and USFS for mitigating impacts to prairie birds such as sage grouse in 13 states. You say nothing about how birds have been affected since you no longer "implement rotational grazing". NBR is not well funded and or well staffed to monitor affects of going in a different direction from policy of other agencies? I suggest data at NBR is better than anecdotal and shows benefit to rotational system despite what Briske may say about grazing systems in general. That study is a study of other studies and does not address issues specific to NBR such as massive invasives and Palouse ecology.

Concerning the specific statements in Briske, plant and animal production may be equal or greater with season long grazing system but conversion of native plant ecosystems to something else (invasives or non palatable red three awn) is not addressed by that paper. Conversion is what is going on at NBR and it is due to invasives, not grazing system failure. Continuous season long grazing by bison is not going to fix it. To the contrary bison will camp out in favorite places during spring growing season and make optimum seed bed for the abundant seed of whitetop, Dalmatian toadflax, spotted knapweed and sulphur cinquefoil.

Rather than hanging your hat on Briske, take a look at Elk Lane for a great example of short duration, high intensity grazing outside the spring growing season. It should be thought provoking for anyone using an adaptive management approach to problem solving. If you want to see what season long grazing results are, drive outside the NBR and go south of the entrance about 1/2 mile and look up onto the NBR, across CSKT land that has been continuously grazed for a century. CSKT land is dominated by juniper, NBR is still bunch grass of rough fescue. The later will be destroyed if bison are allowed to graze every spring where they want to.

In my career, I listened very closely to opinions of former managers from stations I was selected to manage. It was very helpful in avoiding issues they had tangled with.

**History:** I request that you take down the PDF displayed on NBR website that is credited to myself, Bill Reffalt and Pat Jamieson "From the Past For the Future". The document has been altered since we drafted it for 2008 NBR Centennial Celebration. However, none of us altered it. Someone else in USFWS did and our names have been retained. Needless to say we are very disappointed. I do not agree with the document reference to "Latati". CSKT refers to

Latati but their view of history has changed in recent years. I can not support their changes given they are 2nd and 3rd hand accounts through oral history translation from 1970s, 100 years post events. The story we developed for the Centennial was developed from Aubrey (1902) a first hand account of Walking Coyote only 25 years after events. That account is well supported by the book 'I Will be Meat for my Salish', published by Salish Kootenai College and Montana Historical Society in 2001.

Needless to say, the modifications lessen my trust of USFWS, even though by blood will always run Blue Goose Blue!  
The quicker you confirm PDF's removal the better.

I have attached a word document with "track changes" from our document developed in 2008 and the document you now exhibit. Seems rather dishonest, wouldn't you agree?

Anything I can do to help you, know that I still care.

[Quoted text hidden]



**Comparison Version 6 and PDF on NBR Web site.docx**  
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## THE NATIONAL BISON RANGE ~ From the Past, For the Future

Compiled by Bill Reffalt, Bill West, and Pat Jamieson

By signing the Act of May 23, 1908 to establish the National Bison Range in Montana, President Theodore Roosevelt laid a substantial cornerstone in the emerging edifice of wildlife conservation. Never before in the history of America had the U.S. Congress appropriated money to buy lands expressly to provide shelter and space for wildlife—a refuge constructed and operated to help bison recover from the debilitating slaughter of the previous 60 years.

Bison were an essential part of American Plains ~~Indians'~~ Indians' lives, providing food, clothing, shelter, utensils, weapons, ~~and more.~~ Tribes like the Confederated Salish and Kootenai have maintained a deep spiritual connection. The animals continue to the bison. Their historical archives ~~contain be of~~ are of important ~~detail~~ cultural and religious significance to a number of present-day tribes. Lewis and Clark were able to see bison herds large enough to cover the plains and valleys. Early settlers wrote in their journals about tribal traditions and traditional hunting areas using original area place names, seeing herds of bison traveling pass for a whole day.

The American bison originally ranged from Great Slave Lake in Canada ~~southward into to~~ southward into Mexico, and from Nevada and Oregon to Tennessee and Pennsylvania, Virginia, and into Georgia. The great herds that wandered over the prairies prior to the ~~1800's~~ 1800's contained perhaps 30 to 60 million animals. Pressures on bison ~~numbers~~ numbers started with competition for forage from horses, brought ~~to America over~~ to America over in the ~~1500's~~ 1500's by Spanish explorers. ~~Soon~~ Further competition came in the form of cattle competed too. They, which also brought transmissible diseases. ~~Demand~~ The demand for bison robes and leather increased ~~the~~ the hunting ~~pressures~~ pressure by ~~Native~~ Native Americans and fur trappers. The railroads paid professional hunters to provide meat to their workers, ~~primarily from bison.~~ The 40-year period ~~prior~~ ending around 1880 marked the major slaughter of ~~bison, the animals.~~ Millions of these great beasts were shot ~~annually during this time, for meat (sometimes only the tongue), for hides, for sport, for~~ military reasons. Many carcasses were left to rot in the prairie sun. By 1883, they were ~~nearing close to~~ nearing extinction. ~~As At the twentieth century began~~ start of 1900, there were ~~fewer~~ fewer than 100 ~~wild~~ wild ~~unconfined~~ unconfined bison known to exist ~~in the wild.~~ The ~~awesome~~ spectacle of bison ~~blanketing covering~~ blanketing the prairies was lost, forever.

~~Fifty years~~ A half-century before the U.S. ~~gave official recognition to law required a list of~~ gave official recognition to law required a list of endangered and threatened species, the American bison became an icon for ~~athe~~ the crisis in conservation. ~~Although we cannot~~ can not experience the endless bison herds seen before the ~~mid-19<sup>th</sup> Century~~ turn of the century, we can still enjoy these magnificent creatures at places such as the National Bison Range ~~in western~~

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Montana. The history of the slaughter and the comeback is a story of sadness and eventual triumph, of shame tempered by prevailing and courage. It is about the people with who had the foresight and the will to fashion ways to conserve this iconic species to preserve these animals.

It was through the vision of far-sighted individuals that we still have bison today. Even at the turn of the century, there were people who felt that this magnificent animal was worth saving. Ranchers William T. Hornaday, the President of the American Bison Society (founded in New York City in 1905), assisted by his members, actively lobbied Congress to buy suitable land and provide a protecting warden. The Bison Society promised to supply pure-blooded bison to begin a new herd. Other visionaries such as Charles Goodnight of Texas, C. J. "Buffalo" Jones of Kansas, James McKay of Winnipeg, Canada, Tribal members Michel Pablo and Charles Allard of Montana, and several others CJ "Buffalo" Jones were among those just a handful of the ranchers who established and maintained a few small herds. Their motivation for 2

maintaining bison herds was a combination of respect and feeling for the great animals and part for the economic benefits. From such these scattered remnants today's bands, public herds, including the National Bison Range in western Montana, were started.

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Bison herds in the Mission Valley dated to the 1870's back more than 20 years when Latati, a Pend d'Oreille man of the Flathead Reservation, returned home from the plains with six bison calves. His By 1884, his herd grew had grown to 13 animals by 1884, when he Samuel Walking Coyote sold them to partners Michel Pablo and Charles Allard, both of Indian and European descent. They already herded cattle on in the Reservation's valley's open grasslands. The Pablo and Allard herd became bought additional bison from C. J. "Buffalo" Jones in 1893 (but sold them back to him in 1895, when he recovered from financial woes). The Pablo-Allard herd thrived and became one of the largest private bison herds in the country.

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When Allard died suddenly in 1896, a herd-division of the herd became necessary. Beginning in 1901, Allard's family sold began to sell their portion of the joint bison herd. Part was sold in that year by Allard's widow Mrs. Louise Allard to Charles and Alicia Conrad of Kalispell.

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About 1907-08, the U.S. government was developing plans for to begin the Indian allotment process on the reservation Flathead Reservation as defined by the 1904 Flathead Allotment Act. The Tribes bitterly opposed the opening of the Reservation. It provided that once all eligible Indians had an allotment, reservation lands would be available for non-Indians Indian settlement under public land laws, with persons selected by lottery. The Flathead Allotment Act had in 1910. U.S. Senator Henry Dawes championed the Allotment Act of 1887, along with several organizations, like the Indian Rights Association. Despite tribal opposition, the 1904 Flathead Allotment Act passed with substantial support from western Montanans. Despite Tribal objections, the The bill was pushed through Congress by Montana's U.S. Senator Joseph Dixon, also owner of the Missoulian newspaper.

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William T. Hornaday, It aligned with the earlier Dawes Indian Allotment Act of 1887. That law was supported by several organizations collectively known as the American Bison Society (founded in New York City in 1905, with President Roosevelt as "friends of the Indians." It ultimately was considered a failure and was replaced by a new policy recognizing Tribal governments and their powers. Hornaday, Honorary President), assisted by many of its members, actively lobbied Congress to purchase suitable land while committing the American Bison Society to supply the pure-blooded bison to begin a new herd.

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In 1908, Morton Elrod, Professor of Biology at the University of Montana, was commissioned by the American Bison Society to locate suitable bison range. He sought assistance from many knowledgeable people, including Michel Pablo, Joseph Allard (son of the deceased partner), and Duncan McDonald, of the Flathead Indian Reservation. McDonald was of Indian and European descent and was respected in both communities. On horseback, Elrod and McDonald rode many miles on horseback together exploring for a suitable site. Based on McDonald's statements to Elrod that the Indian community would support the Bison Society proposal to buy bison and place bison on a Government reserve within the reservation. McDonald was explicit, "Every Indian will be glad if the Government can and will save them, and keep them where they can be seen." Afterward, McDonald expressed disappointment that the Bison Range was closed to visitors. His concerns were eventually addressed in the 1920's by opening the Range to the public.

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Range land was purchased by the Government from five allotments and from the Flathead Nation in 1908, removing it from lands to be made available in 1910 to non-Indian settlers. Meanwhile, after the law passed, President signed the Bison Range Act, the American Bison Society began soliciting donations throughout the country to purchase bison. Much of the money. This effort predated radio broadcasts by which to seek donors and was heavily focused in the East. Hand-written letters, newspapers and group meetings served to send forth the messages of need. While a few wealthy donors came forward to support the effort, there were many small donations of \$1 to \$5, much of which were collected by women's groups. People in all, people from 29 of 46 States then in the Union contributed \$10,560.50 during the one year effort (equal to \$245,475; in 2007 dollars). that equals \$245,474.80 based on Consumer Price Index adjustment.

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Meanwhile, Fences and loss of open grazing due to the Allotment Act meant Michel Pablo was forced to round up and sell his herd because of the Flathead Allotment Act. Hornaday attempted to buy bison from Pablo, still corresponding as late as June of 1909 to buy bison from Pablo for possible delivery to the new range. In October, Pablo and Hornaday did not make a deal nor could Pablo find another American buyer. He sold and delivered 700 bison to Canada, and the roundup took several seasons, extending to 1912. Nearly 100 bison wranglers worked from horseback to accomplish the task the Canadian government.

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~~Hornaday knew that However,~~ bison with Pablo-Allard genetic heritage linked to the Pend d'Oreille man's bison and the Pablo-Allard herd were still available in Kalispell. -By 1909 Charles Conrad had died, but his widow wife Alicia had become a staunch supporter of the bison cause. -She agreed to sell 34 bison to the American Bison Society and ~~also then~~ she described as her two finest animals. During the same time William Hornaday persuaded ~~Texas rancher~~ Charles Goodnight, the famous Texas rancher to donate two bison from his Texas panhandle bison herd. - Goodnight's bison were shipped to Alicia Conrad where they were added to ~~Conrad's the~~ herd, but (one of which died before delivery, reaching the new Refuge). From New Hampshire, Austin Corbin donated three more. ~~In all, forty Together, these were the~~ animals that became the herd all National Bison Range visitors now enjoy ~~(12 today. Only twelve new bison from other herds have been added since 1910).~~

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As one of ~~four~~ the three initial reserves set aside ~~early in the 20<sup>th</sup> Century for preserving the~~ preservation of the American bison, this National Wildlife Refuge has played an important role in the successful great success story of recovery of the once endangered plains bison. -Today the Bison Range herd is maintained at between 350- and 500 bison while extra-animals and excess bison are sold or donated to provide a gene pool and breeding stock for beginning to start or genetically augmenting augment other herds. - Animals are also donated to tribe tribal governments and the Inter- Tribal Bison Cooperative (ITBC) to support their bison restoration- on Tribal lands. The National Bison Range herd shows high genetic diversity compared in relation to bison of the other federal herds and continues to. The Range's herd will play a keyan important role in the full continued recovery of the species.

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~~Based on The stated mission of the National Bison Range in the~~ original enabling legislation the National Bison Range's mission was "was "to provide a representative herd of bison, or buffalo, under reasonably natural conditions, to help ensure their the preservation of the species for continued public benefit and enjoyment." @. To develop a full help round out the wildlife component in the Range, other large mammals added- were brought to the Refuge. Even before the final three founding 3 bison arrived- from New Hampshire arrived in 1910, four 4 white-tailed deer 4

donated by the City of Missoula arrived and were released into the Range- hills. Antelope from Yellowstone National Park (with capture and shipping costs donated by the Boone and Crockett Club of New York) were released on the Range in December 1910. -The first seven 7 elk, donated by the State of Wyoming, arrived at the Range in April 1911. -Mule deer were brought to the Range from Yellowstone Park in 1918. -Twelve Rocky Mountain bighorn sheep, donated from Canada's Banff National Park in Canada, were released on the Range in 1922. -The final large mammals mammal component of the Range was released in 1964- Rocky Mountain goats were released in 1964-. Each new species brought challenges and new requirements for successful their incorporation into the ecological complex of the Range. Progeny from these original Bison Range reintroductions have been captured and used to restore wildlife populations across Montana.

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The wildlife roam an extensive native Palouse Prairie at the Bison Range, one of the largest remnants of this rare prairie, which once covered lands in Idaho and eastern Washington. Predominant grasses of

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the Palouse system are rough fescue, Idaho fescue and bluebunch wheatgrass. Other habitats at the refuge include montane forests of Ponderosa pine and Douglas fir. Along the rivers and creeks grow cottonwoods and Rocky Mountain juniper. The diverse habitats and ecosystems represented on the National Bison Range provide for a wide diversity of wildlife species which share the Refuge with bison. The refuge was also designated a bird reserve in 1921.

Today, the Refuge and its ecosystems are intact but fresh studies and adjustments are often necessary and desirable. The Range animal and plant complex is the result of dedicated Service employees, volunteers and partners seeking ways to overcome difficulty and achieve desired outcomes. The National Bison Range represents a full Century of successful development and application of significantimportant land and habitat management practices for large mammals within a dynamic, enclosed system. -It is a National Treasure, a gift from the past for future generations.

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