

**GALLATIN WILDLIFE  
ASSOCIATION**

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April 6, 2018

Secretary Ryan Zinke  
Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Dear Secretary Zinke:

We are writing you today concerning the status of the National Bison Range (NBR) near Moiese, Montana. Even though the Gallatin Wildlife Association was not party to the recent lawsuit concerning the matter at Moiese, as a non-profit volunteer wildlife conservation organization we are concerned about the health of all wildlife and their respective habitat on public lands. We are also concerned about the attempts by some to undermine the integrity of those same lands. We represent hunters, anglers and other wildlife advocates in Southwest Montana and elsewhere. Our mission is to protect habitat and conserve fish and wildlife. This letter is to alert you to the status and issues of the NBR.

On May 18, 2017, the U.S. Fish and Wildlife Service posted the following in the Federal Register:

*“Specifically, due to the variety of information and perspectives received during the comment period and a change in policy direction, we will not proceed with evaluating a preferred alternative of legislative transfer of the NBR.”*

Within that same posting, the U.S. Fish and Wildlife Service (USFWS) states they are going to revise the Notice of Intent and prepare a draft Comprehensive Conservation Plan (CCP) and an Environmental Impact Statement (EIS). These documents will address the issue as to how the USFWS will manage the NBR over the next 15 years. This point has even been litigated and summarized in a recent court decision. The settlement agreement states the drafts of the CCP and NEPA documents will be completed by July 31, 2022 with finalization of both by January 31, 2023. Basically, what all this means is that the USFWS has accepted

responsibility and ownership of the NBR. We can't stress this viewpoint enough. This also makes USFWS responsible for the management and operation of the NBR.

As said, GWA was not a party to any litigation concerning this facility, but we have been following the progression of events and, as stated, we are very concerned about the future of the NBR. A more imminent concern of ours, however, is the health of the bison and wildlife contained within the confines of this facility. In recent weeks, conditions at the facility have been brought to our attention from multiple sources. This all but verifies and highlights the justification of our incertitude. We urge you to look deeply into these matters.

### **The Facts Leading to Where We Are**

Not to relitigate the past, but there does need to be some basic understanding as to why we are where we are. USFWS' removal and/or transfer of loyal employees who disagreed with the transfer of the NBR to the Confederated Salish and Kootenai Tribes (CSKT) has led to poor morale and a minimal work force. A minimal work force which, by the way, cannot carry on the functions of the NBR. The transfer of two former refuge managers and a third being placed on administrative leave and detailed to the Denver Regional Office has exasperated that effort. The failure to provide adequate funding to the NBR because of a regional wish to transfer the NBR out of the National Wildlife Refuge system has led to a shortage of funds, staff and support. All of which has led to a lack of direction upon the removal of NBR managers.

### **Current Status as We Understand It**

Since October 2017, the regional leadership has directed the visitor center at the National Bison Range to remain closed to the public. Since that time, funding and staffing has been drastically reduced within the USFWS providing less than half of what is necessary. There haven't been any upgrades or maintenance to the infrastructure since October of 2017. Current funding is at a record low with the refuge budget containing less than half of the budget of that in 2010. This "bare-bones budget" is emblematic of a management style of shuffling managers with little or no experience in and out of rotation. We questioned the rationale and reasoning as to why replacements have not been hired for those federal positions left vacant. We've been told that regional leadership has made the removal of these positions official, leaving the facility permanently ill-equipped to carry out their mission. At one time, the National Bison Range had 18 permanent employees, but today only 5.5 positions remain. Essentially, regional leadership has not restored any of the funding for positions such as the supervisory visitor services manager, deputy refuge manager, lead biologist, maintenance worker, and range conservationist.

Hints of chaos at the NBR can be found by reviewing the facilities website. Reference dates as far back as 2014 and 2016 seem to signify the website is not

routinely being maintained. It signifies that it is out of date providing the public with either misleading or inaccurate information. We question the validity of the information contained on the contact page. How many of those personnel listed are actually on site working on behalf of the NBR? With the NBR being the 10<sup>th</sup> most visited site within the National Wildlife Refuge System, what are the plans for this summer? Are there future plans to open the popular auto tour route? If so, we understand no road or fence maintenance has been undertaken and question rather or not the facilities have been adequately maintained to serve the public.

But perhaps our primary concern in the short term is the imminent health of bison and wildlife in the confines of the NBR. Is there sufficient staffing and training of NBR personnel to manage and operate the infrastructure of all water systems within the facility? With summer approaching, proper range management and water will be necessary for the health of wildlife. We remind the USFWS that the health and welfare of bison and all wildlife within the NBR is the responsibility of the agency itself. Failure to carry out that mission is a dereliction of duty. So far, it seems as if the USFWS has done little to carry out the mission at Moiese since there was a move to transfer the facility of the NBR over to the CSKT. That excuse doesn't work anymore.

### **So What Happens Now?**

We stated above that the USFWS owns the NBR. They agreed to accept the responsibility to operate and maintain the NBR and to complete the CCP and EIS as stated in the court's settlement agreement. The American people want the NBR to stay within the ranks of the National Wildlife Refuge System. The problems of the NBR are manmade and can be corrected. But they are being compounded by the action or inaction of the USFWS itself. We bring these matters to your attention for your action. As Secretary of the Interior, you must be aware of the actions, or in this case the lack thereof, by officials within your office and/or regional offices in your name.

If current trends continue during the approaching spring and summer months, one has to wonder what will happen to the bison management program, to the bison themselves, and to the facility overall. When summer comes, water will be in short supply and maintenance projects will be incomplete. Wild bison on the NBR could die of thirst within three, maybe four days.

We hope that you feel as we do that the abuse of such an iconic refuge, established in 1908 by your idol, President Theodore Roosevelt, has to come to an end. We are asking that you investigate what has happened to the staff and funding of the National Bison Range over the last ten years, but particularly since you made your visit to the refuge in March 2017 and once you made your decision about the transfer. Look at the trends and listen to the refuge staff.

The Denver Regional Office needs to fully fund and staff personnel as they have done in the past to ensure a healthy, well-managed National Bison Range. The

USFWS is obligated to do so. It is their mission to do so. If problems at the Denver Regional Office cannot be corrected, perhaps the administrative duties of all National Wildlife Refuges in western Montana should be reassigned to the Regional Office in Portland, Oregon. Perhaps that would be more appropriate. We urge you and your office to investigate these matters. The situation is dire and the matter is urgent, being compounded by the passing of time. The impending tourist season places even more urgency to the matter. We will be watching to see if improvements are being made in the near future.

Thank you for your time in this matter.

Sincerely yours,

Clinton Nagel,  
Board Member for  
Gallatin Wildlife Association  
Bozeman, Montana