



# Public Employees for Environmental Responsibility

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June 9, 2018

Secretary Ryan Zinke  
Department of Interior  
1849 C Street, NW  
Washington, DC 20240

Dear Secretary Zinke:

In April 2017 as one of your first official actions as Interior Secretary, you scrapped the Obama plan for a legislative transfer of the National Bison Range and decided to keep it as a unit of the National Wildlife Refuge System stating that this refuge “is a critical part of our past, present, and future.”

I am writing on behalf of Public Employees for Environmental Responsibility (PEER) to inform you that some subordinates in your Department are working behind the scenes to undermine this declaration and the effect of your decision. Specifically, the Denver regional office of the Fish & Wildlife Service has taken several steps designed to obliterate the programmatic integrity and cripple the operational effectiveness of the National Bison Range.

Founded more than a century ago by one of your conservation icons, President Theodore Roosevelt, the National Bison Range is often called the Crown Jewel of the refuge system. Today, that gem is hidden away, without onsite leadership, operating with a skeleton staff, under conditions imposed by the U.S. Fish & Wildlife Service Denver regional office that are difficult to justify and appear to be part of a petty bureaucratic vendetta. Consider the following:

- Bison Range has been reduced to 4.5 onsite 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 and 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 than the Bison Range but with similar visitation and purposes for preserving plains bison;
- The long-time Bison Range Refuge Manager, Jeff King, who you met during your visit to

the refuge, has for months been on a Denver-ordered detail supporting regional leadership. The refuge is being run by a series of managers shuffled in from other locations on short-term details;

- The large volunteer program at the Bison Range, vital to operating the refuge, was ended last year on orders from the Denver office and has not been authorized to restart; and
- The 40-year partnership with the Glacier National Park Conservancy, who has supplied educational bookstore items to visitors for decades, was abruptly ended by regional leadership. This forced the closing of the visitor center bookstore leaving visitors without opportunities to purchase educational items or refuge specific objects to commemorate their visit. This also removed a funding source for the refuge's volunteer program.

As you know, the National Bison Range is one of Montana's major tourist attractions. It is the 10th most visited refuge in the entire National Wildlife Refuge System. It attracts more than 200,000 visitors each year, most coming from out-of-state and other countries. It also pumps millions of dollars in to the local economy.

Yet thanks to the Denver office, the Bison Range has no one on staff to offer any public use programs and activities, including those once offered to surrounding schools. This is unprecedented on a refuge with such high visitation. The visitor center is staffed by two student interns without any oversight from a visitor services manager, a position that has remained vacant since 2014.

In fact, the Bison Range is operating with so few staff that its visitor center is forced to close two days a week throughout the summer, when visitation peaks. Historically the visitor center remained open 7 days a week, including holidays. Under regional direction, the visitor center doors remain locked on Tuesdays and Wednesdays meaning the public has no interactions with refuge staff and are even *denied access to the public restrooms*, which are behind locked doors.

Closing a visitor center on days when hundreds of people are visiting is unprecedented. Denying them access to even basic visitor amenities, like the public bathrooms, is inexplicable.

On the days when the visitor center is closed there is no one to provide safety orientations to visitors before they enter the one-way nineteen-mile loop road to view the 400 bison inside the 18,900-acre refuge. If they encounter any trouble, the lone law enforcement officer also may not be available, as he has been assigned to cover five refuge units over a large area and may be on his scheduled days off with no backup coverage.

The dramatic loss of permanent staff is also damaging the refuge's natural resources. For example, the inability to keep up with fence maintenance has led to pneumonia wiping out most of the refuge's prized herd of big horn sheep. Reductions in staff has also curbed the ability to control the spread of invasive plants, with invasive weeds, like white top, covering refuge units that previously had been kept free from this botanical intruder.

One of the current ironies is that the Fish & Wildlife Service is finally developing a long-overdue

15-yr Comprehensive Conservation Plan for the Bison Range. The current CCP process is being controlled by Denver leadership with zero involvement of an experienced onsite manager, which is unprecedented in this region.

The only experienced management staff remaining, besides maintenance staff and a refuge officer, is a GS-9 biologist. The proposed staff levels in the draft CCP would restore no more than 2.5 staff back to the Bison Range (visitor services manager, clerical assistant, and 0.5 range technician). With only those slots, the refuge has no hope of accomplishing any new conservation objectives let alone preventing future adverse impacts. This reduces the CCP and accompanying Environmental Impact Statement to a meaningless paper exercise, wasting precious funds.

The draft CCP also falsely claims that the current size of the Bison Range staff is the standard. This seems to signal regional leadership's intention to permanently eliminate long-standing and critical positions, including the visitor services manager, deputy refuge manager, supervisory biologist, range conservationist, and maintenance positions.

Indicative of Denver regional office's approach was the complete exclusion of the Bison Range from regional workforce planning in 2017 when the transfer proposal was still on the table. While the Bison Range was eventually mentioned in the plan, unlike the remaining refuges, no strategic planning for its future staffing needs occurred.

I am writing because I do not believe that any of the above conditions are imposed at your direction and I doubt that you have knowledge of them. I also suspect that if you knew what was going on you would not be pleased and would take immediate steps to restore the Bison Range to a functioning, autonomous refuge. That is my hope in writing this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Ruch".

Jeff Ruch  
Executive Director