

May 1, 2018

APR Scoping Comments
Malta BLM Field Office
47285 U.S. Highway 2
Malta, Montana 59538



Dear BLM and the U. S. Department of Interior,

The Helena Hunters and Anglers Association supports allowing the American Prairie Reserve (APR) to utilize grazing privileges on any and all federal lands that have grazing options or priorities associated with the lands they have acquired to date and will acquire in the future. We support this action with the expectation that it will give grazing priority to bison, our National Mammal. We support and request that the analysis of this action include those items the APR and others have suggested including: *Improving range and wildlife habitat; removal of fencing; restoring the National Mammal to its historical range; help the Department of Interior (DOI) with wildlife habitat and migration Secretarial Orders; and, increase public recreation and use of public lands.* In addition to these site-specific topics, we strongly urge the DOI to address this action in the broader context of our overall relationship with our National Mammal.

There is no better time to take a broader look at bison management than now; and there is no better place to have this discussion than on a portion of Montana's Northern Great Plains. In this assessment the DOI needs to take more than a casual look at history in any decision related to bison.

On the Lewis and Clark Expedition's return in 1806, as Captain Lewis was nearing the Great Falls of the Missouri River, his journal entry for July 11, tells us what they experienced:

*"The buffalo are in such numbers, that on a moderate computation, there could not have been fewer than ten thousand within a circuit of two miles. At this season, they are bellowing in every direction, so as to form an almost continual roar, which at first alarmed our horses, who being from west of the mountains, are unused to the noise and appearance of these animals..."*¹

78 years later (1884) they were gone – all of them.

Theodore Roosevelt, who was hunting and ranching near Medora, North Dakota, wrote in one of his books first published in 1885:

"No sight is more common on the plains than that of a bleached buffalo skull; and their countless numbers attest the abundance of the animal at a time not so very long past...A ranchman who.... had made a journey of a thousand miles across Northern Montana, along the Milk River, told me that, to use his own expression,

¹ Lewis, Meriwether. The Lewis and Clark Expedition. The 1814 Edition, Unabridged, Volume 1 J.B. Lippincott Company, Philadelphia and New York. First Edition, 1961.

during the whole distance he was never out of sight of a dead buffalo, and never in sight of a live one.”²

A year after Roosevelt’s 1885 publication, the U. S. Cavalry rode into Yellowstone National Park to prevent the last surviving handful of wild bison from being poached into extinction. The year was 1886, a mere ten years after Colonel Custer and the 7th Cavalry bit the dust in the Battle of the Little Big Horn where Native Americans fought to sustain what had been their relationship with the bison. That year, 1876, also saw a record 80,000 buffalo hides shipped down river from Fort Benton.³ The land under consideration in this analysis, had become the wildlife bone-yard of North America.

Now, a century and forty-two years after our Nation’s 1876 Centennial, our wild remnant of bison, our National Mammal, has been through a lot. That stress includes, a period in the 1980s when state game wardens and federal park rangers led shooters to kill every bison that set a hoof into Montana. While that practice was terminated, bison probably can still lay claim to being the most harassed species of public wildlife on earth. They are currently being subjected to: hazing, mechanical chasing, herding, harassing, prodding, poking, penning, at times drugged with many ultimately sent to commercial slaughter houses for final disposition. The irony is that this treatment is being delivered by an agency created to be the custodian of our most precious wildlife resources. In fact, the DOI’s mascot, established in 1849, is the bison. It is time to put our management of the bison in the perspective of the time and the place where we start considering them – they have endured enough.

We are aware that the American Prairie Foundation is not a government agency. We are also aware of the fact that private non-profit citizen organizations have been taking action when government custodians fail to meet public conservation expectations since the Boone and Crockett Club and National Audubon Society formed in the 19th Century. We thus strongly urge the DOI find in favor of the bison. This is an animal whose image appears: on the National Park Service’s logo since 1951; was named National Mammal in 2016; and whose skull was engraved on the official Montana quarter in 2007. Do the right thing for the bison, that’s our two-bits worth.

Helena Hunters and Anglers President

Helena Hunters and Anglers Member



Stan Frasier



Jim Posewitz

² Theodore Roosevelt. *Hunting Trips of a Ranchman & Wilderness Hunter*, Modern Library Edition, Random House, 1996.

³ Picton and Picton *Saga of the Sun*, Montana Department of Fish and Game, 1975.