

InterTribal Bison Cooperative

2497 West Chicago Street • Rapid City, South Dakota 57702
PHONE: (605) 394-9730 • FAX: (605) 394-7742 • E-MAIL: itbc@itbcbison.com
www.itbcbison.com

To: Interagency Bison Management Plan Partners
From: InterTribal Bison Cooperative
Date: January 29, 2010
RE: Comments for February 2, 2010 Meeting

This letter is in response to requested changes by Montana Department of Livestock (MDoL) to the Adaptive Management Plan as well as the position offered by the National Park Service (NPS) in the letter dated January 26, 2010. Along with NPS, ITBC opposes MDoL's proposed changes to the 2009 Adaptive Management Plan that effectively result in reduced bison tolerance and unnecessary restrictions on bison access to public lands where there are no cattle present. As such, ITBC offers the following comments.

As discussed extensively at the IBMP meeting held November 18-19, 2009 and in the follow up teleconferences on December 14 and 18 held by the Technical Committee, the most troublesome aspect of the proposed trigger points is that they are founded on very limited data derived only from 2008 through 2009. More specifically, they are founded on a "rolling average" of two data points of bison aerial counts outside of Yellowstone National Park (YNP). As all of the partners agreed on the Technical Committee's teleconferences, comprehensive data on a multitude of environmental factors influencing bison migration is needed to facilitate more effective management decisions and to fulfill the objectives set forth in the 2009 Adaptive Management Plan signed by IBMP managers. The partners briefly discussed the prospect of a collaborative predictive modeling effort in order to meet that need and to better understand the carrying capacities of Horse Butte and other portions of the Western Management Area. ITBC is in full support of such an effort. However, trigger points and management decisions derived from two data points of population observations without data from factors inherent in a dynamic system such as YNP and the surrounding areas is an unnecessarily restrictive proposal that ITBC cannot support.

Additionally, as follow up to the suggestion offered by NPS that IBMP managers emphasize management of bison as wildlife and use state and treaty hunts to manage bison numbers and distribution, ITBC would also like to emphasize that bison are a treaty-based resource for the Nez Perce and Salish Kootenai Tribes pursuant to the 1855 Treaty and as recognized by the State

• Member Tribes •

- Blackfeet • Cheyenne & Arapaho Tribes of OK • Cheyenne River Sioux • Chippewa Cree Tribe of Rocky Boy's Reservation • Cochiti Pueblo • Comanche Tribe of OK •
 - Confederated Salish & Kootenai • Confederated Tribes of the Umatilla • Crow • Crow Creek Sioux • Iowa Tribe of OK •
 - Flandreau Santee Sioux • Fort Peck Tribes • Fort Belknap Gros Ventre & Assiniboine • Ho-Chunk Nation • Jicarilla Apache • Kalispel • Lower Brule Sioux •
- Mesa Grande Band of Mission Indians • Miami Tribe of OK • Modoc of OK • Nambé' Pueblo • Nez Perce • Northern Arapaho • Northern Cheyenne • Oglala Sioux Tribe •
- Omaha Tribe of NE • Oneida Nation of WI • Picuris Pueblo • Pojoaque Pueblo • Ponca of NE • Prairie Band Potawatomi Nation • Prairie Island Dakota • Rosebud Sioux •
- Round Valley Tribes • Salt River Pima-Maricopa Indian Community • San Juan Pueblo • Sandia Pueblo • Santee Sioux of NE • Seneca Cayuga Tribe of OK • Shawnee •
 - Shoshone-Bannock • Sisseton-Wahpeton Oyate • Southern Ute • Spirit Lake Sioux • Spokane • Standing Rock Sioux • Stevens Village IRA Council, AK •
 - Stillaguamish Tribe of Indians • Taos Pueblo • Tesuque Pueblo • Three Affiliated Tribes • Turtle Mountain Band of Chippewa • Ute • Winnebago of NE •
 - Yakama Nation • Yankton Sioux •

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of Montana. Both are member Tribes of ITBC and look forward to future treaty hunts as an effective management tool.

In regards to the transfer of Yellowstone bison to quarantine facilities, ITBC emphasizes the need for procedures and communication protocols to transfer those animals to Tribal lands and facilities to help facilitate the conservation, cultural and traditional practices of those respective Tribes and effectively reduce the slaughter of bison. ITBC is willing to work with the Partners on developing such communication protocols and moving forward in a productive way.

Finally, ITBC is opposed to the addition of Park and Madison Counties as IBMP partners. While these counties have valid concerns given their vicinity to YNP, each has effective representation on IBMP through the state agencies currently included in IBMP and can voice their concerns through these state agencies. Moreover, county interests in bison management matters are essentially synonymous with state agencies. Conversely, ITBC, Confederated Tribes of Salish and Kootenai and the Nez Perce Tribe each are separate sovereign entities that seek to protect treaty rights as described above and cultivating a government to government relationship.

ITBC remains committed to reestablishing bison herds on Indian lands to promote cultural enhancement, ecological restoration, and economic development. We look forward to working with you on the above issues in a constructive and respectful manner that mutually meets this mission and IBMP agency management directives.

Sincerely,



Ervin Carlson
President

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