

Wyoming Department of Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.
Equal Opportunity in Employment and Services



Dave Freudenthal, Governor
John Etchepare, Director

March 9, 2009

Bison Translocation
Montana Fish, Wildlife and Parks
1420 E. 6th Ave
Helena, MT 59601

To whom it may concern:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Draft Environmental Assessment (EA) to translocate 41 brucellosis-free bison from the bison quarantine facility near Gardiner, Montana to the Northern Arapaho Tribe at the Wind River Reservation in central Wyoming.

Our comments are specific to our mission within state government: dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal has major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

The WDA will Support Alternative A as proposed by the Montana Department of Fish, Wildlife and Parks (FWP). We believe bison, like other livestock, are an important vegetative management tool and can benefit the Northern Arapaho Tribe in many ways.

We have read the EA and believe there are a number of major management components missing, which should be in place and answered prior to the release of any bison.

- **Fencing:**
 - 1) Describe the type of fencing proposed, including height, wire type, fence post type, etc. FWP should give fencing alternatives within the proposed alternative, including electrical.
 - 2) Describe future maintenance of the fence ensuring bison will remain on the ranch.
 - 3) Describe how this fence is designed to permit wildlife like, deer, elk, antelope, sage grouse and others to migrate in and out of the perimeter fencing.
 - 4) Describe how this fence is considering Wyoming Game and Fish Department (WGFD) recommendations for deterring sage grouse contact or interference.
- **Protocol for Escape:** The FWP fails to describe the protocol for escaped bison outside the perimeter fencing. Escape of bison with current fences on the Red Canyon Ranch has created concern by local community members, motorists and neighboring landowners. We strongly encourage FWP and Northern Arapaho Tribe address who is ultimately responsible for the damage and possible disease transmission caused by free roaming bison. This is a major concern needing addressed in the EA prior to releasing the bison and having this reviewed by the Wyoming Livestock Board (WLB).

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- Water: The FWP and Northern Arapaho Tribe fail to include any discussion of where the bison will go for water and if this water source is vital for other wildlife. Are there enough water sources to prevent over utilization? Is there a rotational grazing system in place to mimic seasonal use by the bison? Yearlong livestock grazing is highly discouraged by wildlife advocates and we strive to support rangeland health enhancements. We would encourage the Northern Arapaho Tribe work with a rangeland monitoring specialist to gather baseline vegetative data and continue to monitor rangeland health into the future.

The WDA thanks FWP and the Northern Arapaho Tribe for receiving our comments. We look forward to the addition of our concerns and comments in the EA and prior to the implementation of this translocation. As a final recommendation, the Northern Arapaho Tribe may benefit from a bison management plan, which the WDA, WLB and WGFD could help review to ensure positive results are achieved.

Sincerely,

A handwritten signature in blue ink that reads "Kaven Duett for John Etchepare". The signature is written in a cursive style.

John Etchepare
Director

JE/jw

Cc: Governor's Planning Office
WDA Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming State Grazing Board
Wyoming Game and Fish Department
Northern Arapaho Tribal Council
Wyoming Livestock Board