



United States Department of the Interior

NATIONAL PARK SERVICE
YELLOWSTONE NATIONAL PARK
P.O. Box 168
Yellowstone National Park, Wyoming 82190



IN REPLY REFER TO:

A3815a/9.B.(YELL)
xN1615/1.A.2.

VIA EMAIL – NO HARD COPY TO FOLLOW

JUL 22 2024

Honorable Greg Gianforte
Governor of Montana
State Capitol
P.O. Box 200801
Helena, Montana 59620

Governor Gianforte:

I received your May 15, 2024, and October 10, 2023, letters regarding your continued concerns with Yellowstone's bison management plan and final environmental impact statement (FEIS). It is disappointing that the State has taken such an adversarial position on the park's preferred alternative. The alternative maintains a framework that addresses many of the State's concerns while solidifying much of the progress made by the Interagency Bison Management Plan (IBMP) partners over the past two decades.

The NPS preferred alternative in summary:

- continues our commitment to the primary IBMP goals outlined in the 2000 EIS;
- continues our significant financial investments and actions needed to achieve those goals;
- maintains a population that is within a proven manageable range and well within the ten-year average;
- maintains a population range that has allowed us to successfully maintain spatial and temporal separation between bison and cattle outside the park, resulting in zero brucellosis transmissions to date;
- maintains a population range that supports an important role in the ecological balance of the park;
- allows for increased bison conservation and restoration opportunities in Yellowstone and across the country, including tribal lands, while simultaneously protecting the genetic integrity of the species;
- honors government tribal treaty and trust responsibilities;
- uses the best science and allows for adaptive management to shape decision making in the future;
- continues the use of a full range of population management options;
- boosts economic spending in surrounding Montana communities and improves visitor experiences;
- sets a population assurance threshold of 5,200, where NPS and partners will begin managing to a declining population, something not in the original IBMP;
- continues the transfer of bison to tribes for processing as part of the tribal food transfer program when population levels warrant, and;
- ships brucellosis positive bison to processing to reduce disease prevalence within the population.

Regarding the State's insistence on maintaining the bison population at 3,000, the bison population in Yellowstone exceeded 5,000 for the first time in 2005, even when the State was partnering with the NPS to capture and ship bison each year, something it no longer does. Since 2018, the population has been as low as 3,600 (2018), 3,800 (2020), and 3,800 (2023). Although the population increased to 5,900 in 2022 (due to multiple factors), it was reduced to 3,800 in a single winter, primarily through tribal harvests and NPS capture operations. Had we started the winter of 2022/2023 with 3,000 bison as the State has demanded, the population would have decreased to less than 1,500, which is unacceptable for multiple reasons outlined in the FEIS.

Maintaining bison numbers at 3,000 would require aggressive removals of bison migrating to the park boundary, as well as in the park's interior. These actions could substantially decrease genetic diversity and skew the age and sex composition of the population. Low numbers of bison could lessen the long-term viability of the population and diminish the ecological role of bison at engineering habitats, redistributing nutrients, altering plant growth patterns, improving biodiversity, and providing meat for predators, scavengers, and decomposers. Most tribal hunting opportunities would also be eliminated.

Regarding the various scientific studies the State has cited on ecological impacts of bison and overgrazing in Lamar Valley, the FEIS provides additional analysis and information on habitat impacts in the park, including riparian areas. Roughly 30,000 acres of the Lamar Valley and Little America support the largest concentration of bison in Yellowstone, but account for only 6 percent of the grazable acreage in the park. Although there are times of the year where this small percentage of the park's acreage would be considered "overgrazed" from a ranching perspective, Yellowstone is not a ranch, nor do we manage bison as cattle. The State portraying these areas as being representative of the entire park is greatly misleading. These areas provide some of the best wildlife viewing in North America, which is a major driver of visitor enjoyment and economic spending in Montana's local economies surrounding the park.

The State's assertions of resource "impairment" associated with bison are also misleading. The health of the Yellowstone ecosystem is better now than it has been in the last 150 years. The idea that maintaining the bison population in the same range as maintained over past decades is somehow "impairing" the park's resources is unsubstantiated. We evaluated two assessments of the park's overall carrying capacity. Both estimates confirmed that the number of bison considered under the preferred alternative were far less than the park's overall carrying capacity. However, given the lack of available winter habitat outside of the park and State restrictions around external tolerance, a lower population range was identified in the preferred alternative.

Regarding your previous comments on vaccinations, the State is well aware of the complicated nature of vaccines and the massive costs and logistical issues associated with attempting to vaccinate a large wildlife population. This issue has been studied heavily and is well documented. Neither the NPS nor the State are currently in a position to effectively vaccinate bison or elk. Should conditions change, we are prepared to look at what might be feasible, and to what end something like that would change conditions on the ground. Until then, we should be realistic about what is possible right now.

The 2000 Record of Decision for the IBMP directed the NPS to evaluate whether to implement remote delivery vaccination of bison inside YNP to decrease the occurrence of brucellosis. In 2013, the NPS and Fish, Wildlife and Parks (FWP) convened a panel of scientists from federal, state, academic, and non-governmental organizations who reviewed information about the vaccine-induced immune responses of bison and elk, as well as the benefits and limitations of existing tools and emerging technologies for reducing the occurrence of brucellosis in bison and elk. The panel concluded management to maintain separation between cattle and bison was effective at preventing the spread of brucellosis between them. They also thought the vaccination of bison with available vaccines would be cost ineffective and not decrease brucellosis to a level that substantially reduced the need for the separation of bison and cattle.

In the 2014 *Final EIS for the Remote Vaccination Program to Reduce the Prevalence of Brucellosis in Yellowstone Bison*, the NPS concluded that the implementation of parkwide remote vaccination would not achieve desired results and could have unintended negative effects to bison. The NPS based this conclusion on the lack of an easily distributed and highly effective vaccine and limitations of current diagnostic and vaccine delivery technologies. In addition, elk that are also infected and widely distributed would re-infect bison. The NPS is not aware of any significant improvements in existing vaccines or delivery technologies for bison since the 2014 issuance of the Record of Decision not to implement remote vaccination.

The IBMP goals that you have stated are important include maintaining a wild and free ranging bison population, something that seems to be largely missing from the State's many opinions on this EIS process. You have indicated several times that the NPS should not assume that the 2015 tolerance zones authorized by the State will remain in place. The tolerance zones are currently the State's largest contribution to the wild and free ranging IBMP goal. Should the State eliminate the tolerance zones, it should be prepared to allocate the necessary Department of Livestock (DOL) and FWP resources required to manage the population outside of the park. Although we greatly appreciate the State's support with occasional bison hazing and hunting coordination, changing cattle guards, and

veterinarian assistance, the State has not participated in any major on-the-ground population management actions such as capture or transfer since 2008.

We are attempting to balance and achieve multiple objectives, with due regard to the State's concerns, while also navigating the many public opinions and scientific factors on how to best manage this species. Your recent letter called our offer to meet with you again "disingenuous," which is unfortunate. You've had multiple visits from me, senior DOI leadership, and Yellowstone's wildlife team, at your request. Over two years ago, I offered to consider and include a State alternative in the analysis (April 13, 2022 – IBMP meeting). That offer was never followed up on. Regardless, many of the State's concerns around available winter habitat and disease transmission outside the park were considered and included, even if other State demands were found to be unrealistic. Additionally, many of the cooperating agencies, tribes, and most public commenters disagree with the State's position on this plan.

Last, although we are divergent on aspects of this particular issue, the State is a valued partner, our relationship is important, and our goal is to continue working together to protect and build on the progress achieved to this point.

Sincerely,



Cameron H. Sholly
Superintendent

cc:

Mike Honeycutt, Executive Officer, Montana Department of Livestock

Dustin Temple, Director, Montana Fish, Wildlife & Parks

John Grande, President, Montana Stockgrowers Association

Paradise Valley Working Lands Group