



White, P &lt;pj\_white@nps.gov&gt;

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**Bison briefing statements for the Secretary of the Interior**

1 message

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**White, P** <pj\_white@nps.gov>

Wed, Mar 8, 2017 at 4:28 PM

To: Dan Wenk &lt;dan\_wenk@nps.gov&gt;

Cc: "Carpenter, Jennifer" &lt;jennifer\_carpenter@nps.gov&gt;, Kerrie Evans &lt;Kerrie\_Evans@nps.gov&gt;, Rick Wallen &lt;rick\_wallen@nps.gov&gt;, Chris Geremia &lt;chris\_geremia@nps.gov&gt;, "Haas, Sarah" &lt;sarah\_haas@nps.gov&gt;, Patrick Kenney &lt;pat\_kenney@nps.gov&gt;

## Attached:

Issues and recommended long-term management strategy  
Bison management (focusing on winter operations and 2017)  
Quarantine program  
Bison grazing effects

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**4 attachments****YELL\_BisonManagement\_Mar2017.docx**  
19K**YELL\_LongTermBisonMgmt\_USDISecretary\_Mar2017.docx**  
30K**YELL\_BisonQuarantine\_Mar2017.docx**  
28K**BisonGrazing\_GrasslandHealth\_Mar2017.docx**  
21K

## Briefing Statement FY 2017

**Bureau:** National Park Service (NPS)

**Issue:** Bison Management: Long-term Strategy

**Park:** Yellowstone National Park (YELL)

### Key Points

- The conservation of bison requires cooperation and negotiation among multiple agencies and tribes with different mandates, philosophies, and treaties. The Interagency Bison Management Plan (IBMP) has been implemented in YELL and Montana since 2001 to conserve a viable, wild population with no brucellosis transmission to cattle.

(b)5 Draft Deliberative



### Background

- Members of the IBMP include the Animal and Plant Health Inspection Service (APHIS), Forest Service, InterTribal Buffalo Council (ITBC), Montana Department of Livestock, Montana Fish, Wildlife & Parks, Nez Perce Tribe, NPS, and the Salish and Kootenai Tribes of the Flathead Nation.

(b)5 Draft Deliberative



- There is very limited tolerance for wild bison in Montana due to concerns about competition with cattle, human safety, property damage, and brucellosis transmission. Idaho and Wyoming do not want wild bison outside parks.
- About 5,500 bison were counted during summer 2016. High bison densities can degrade other resources and result in mass migrations into Montana. Managers intend to harvest and cull (slaughter) up to 1,300 bison this winter.
- The State of Montana and five tribes have hunted bison on public lands in Montana adjacent to YELL, including the Nez Perce, Salish and Kootenai, Shoshone-Bannock, Umatilla, and Yakama tribes. The State of Montana and each sovereign tribe develop and enforce their own harvest permits, regulations, and seasons.
- By itself, hunting has not been sufficient to attain management removal objectives. Thus, hundreds of bison are culled by the NPS during some winters at the Stephens Creek facility in the northern portion of YELL. The culling and shipment of bison to slaughter facilities is extremely controversial and generates negative publicity.
- The tribes are opposed to culling in YELL because it reduces the number of migrating bison available for treaty hunting opportunities outside the park. However, the NPS provides all bison captured for slaughter to several tribes and a tribal organization (ITBC) for the subsequent distribution of meat and hides to their members.
- Culling needs to occur throughout the winter (January through March) because there is a limited number of processing facilities, limited capacity (150-200 bison) for processing bison each week, and females are late in pregnancy by April. Typically, facilities will not accept bison during autumn due to cattle processing operations.

## Long-Term Management Strategy

- Population size  
(b)5 Draft Deliberative  
[Redacted]
  - Maintain the historic lineages (central [indigenous]; northern [Pablo-Allard]) and existing genetic diversity
- Culling
  - Make capture, culling, shipping, and distribution operations a shared commitment among the agencies(b)5 Draft Deliberative  
[Redacted]
- Hunting  
(b)5 Draft Deliberative  
[Redacted]
  - When possible, use hunters to harvest bison that move outside the northern and western management areas
- Quarantine
  - Implement a surveillance program that accommodates at least 50 male and 50 female bison each year to provide brucellosis-free bison for relocation to public and tribal lands
  - Use the Stephens Creek facility in northern YELL to conduct brucellosis screenings for quarantine and then complete the testing protocol elsewhere (alternatively, the facility could be redesigned for quarantine)
  - Continue to refine quarantine procedures, including testing frequency and duration, as new data become available
- Tolerance and relocation  
(b)5 Draft Deliberative  
[Redacted]
- Conflict resolution
  - Identify likely conflict areas for targeted surveillance and monitoring, and initiate conflict resolution activities when necessary
  - Use targeted fencing, hazing, and hunting to maintain separation between bison and cattle and protect people and property (similar to elk)
  - Capture and/or lethally remove animals that cannot be hazed or pose an imminent risk to humans, property, or livestock
  - Coordinate with the State of Montana to reduce speed limits and vehicle strikes of wildlife on Highways 89 and 191
- Brucellosis
  - No brucellosis suppression actions would be taken, but collaborative research on brucellosis dynamics, diagnostic procedures, and various potential suppression methods would be conducted
  - Continue to manage the already low risk of brucellosis transmission from bison directly to cattle
  - Monitor brucellosis exposure and culture rates over time
- Organization and Involvement  
(b)5 Draft Deliberative  
[Redacted]
  - Continue to hold quarterly meetings with local officials
  - Continue to hold public meetings and consider workshops on relevant management issues

**Contact Person:** Daniel N. Wenk, Superintendent, Yellowstone National Park, 307/344-2002, dan\_wenk@nps.gov  
**Last Updated:** Wednesday, March 8, 2017

## Briefing Statement FY 2017

**Bureau:** National Park Service (NPS)  
**Issue:** Bison Management  
**Member:** General Interest  
**Park:** Yellowstone National Park (YELL)

### Key Points:

- There is very limited tolerance for wild bison in Montana due to concerns about competition with cattle, human safety, property damage, and brucellosis transmission. Idaho and Wyoming do not want wild bison outside parks.
- Approximately 5,500 Yellowstone bison were counted during summer 2016. High bison densities can degrade other resources and result in the migration of thousands of bison into Montana, which can overwhelm managers' abilities to maintain separation with cattle and protect people and property.
- In December 2016, YELL and other members of the Interagency Bison Management Plan (IBMP) agreed to manage for a decreasing population this winter, using hunting in Montana and capture/culling (primarily shipments to slaughter) to remove more than 750 bison; possibly as many as 1,300 bison.
- As of March 8, 2017, 439 bison have been harvested, 563 have been shipped to slaughter, and 23 have been removed by other means (1,025 total). Another 176 bison have been captured, but not yet shipped to slaughter. Additional captures and shipping may continue through March.
- The shipment of bison to meat processing (slaughter) facilities is extremely controversial and generates negative publicity. However, there is limited habitat inside the park and limited tolerance for bison outside the park.

### Background:

- The federal government and the State of Montana are signatories to the IBMP, which has been implemented since 2001 to manage Yellowstone bison and reduce the risk of brucellosis transmission from bison to cattle.
- The plan has been successful at conserving a viable population of wild, wide-ranging bison and there have been no transmissions of brucellosis from bison to cattle. Other members involved with the IBMP include the Animal and Plant Health Inspection Service, Confederated Salish and Kootenai Tribes of the Flathead Nation, Forest Service, InterTribal Buffalo Council, and the Nez Perce Tribe.
- Five tribes have hunted bison on open and unclaimed lands in Montana adjacent to YELL, including the Confederated Salish and Kootenai Tribes, Nez Perce Tribe, Shoshone-Bannock Tribes, Confederated Tribes of the Umatilla Reservation, and the Yakama Nation.
- There are recurring ethical, public relations, and safety issues in communities of Montana adjacent to YELL due to concentrations of hunters, gut piles near roads and residences, shooting across roads, shooting elk, and hunting practices perceived to be unethical (e.g., firing lines of hunters along the park boundary; "flock" shooting).
- Hunting is prohibited in YELL. However, when bison migrations into Montana are small or late, tribal hunters become frustrated and assert that treaty rights include hunting bison inside the park; a point that is encouraged by the Montana legislature, state veterinarian, and organizations associated with the livestock community.

### Current Status:

- While hunting and meat processing are currently available tools for managers, quarantine and release of live, brucellosis-free animals are being considered as a future option. The NPS has prepared a decision document (i.e., FONSI) which is currently under review at the Intermountain Region.
- Montana recently decided to provide for some additional tolerance of bison north and west of the park. In addition, the NPS and Montana have initiated the preparation of a new Environmental Impact Statement to consider changes in the management of bison and brucellosis given substantial new information, changed circumstances, and the passage of 15 years since the IBMP was initiated.

**Contact Person:** Daniel N. Wenk, Superintendent, Yellowstone National Park, 307/344-2002, dan\_wenk@nps.gov  
**Last Updated:** Wednesday, March 8, 2017

## Briefing Statement FY 2017

**Bureau:** National Park Service (NPS)  
**Issue:** Quarantine Program for Yellowstone Bison  
**Member:** General Interest  
**Park:** Yellowstone National Park (YELL)

### Key Points

- The NPS has proposed to transfer Yellowstone bison testing negative for brucellosis exposure for several months from YELL to a facility on the Fort Peck Reservation for the completion of the quarantine testing protocol and eventual release on the Reservation. Bison transport would necessarily occur on highways through Montana.
- The State Veterinarian maintains the shipment of Yellowstone bison through Montana to the Fort Peck Reservation is not allowed per Montana Code Annotated [MCA] 81-2-120 until the bison complete quarantine and are certified as brucellosis-free. Otherwise, he maintains Montana's livestock industry will be threatened.
- The Animal and Plant Health Inspection Service (APHIS) maintains quarantine facilities must be located in or near YELL and approved by state and federal animal health officials per the Uniform Methods and Rules (2003; 91-45-013). This livestock rule was not declared prohibitive during collaborative planning from 2012 to 2016.
- The actual risk of brucellosis transmission from wild bison in quarantine to cattle is negligible due to the state-of-the-art facility, rigorous and proven testing protocol, and commitments from the Assiniboine and Sioux tribes at the Fort Peck Reservation to collaborate with the Montana State Veterinarian and APHIS on further testing.

### Background

- A quarantine feasibility study (2006-2010) by the State of Montana and APHIS north of YELL demonstrated Yellowstone bison repeatedly testing negative for brucellosis exposure could be considered brucellosis-free. Since that study, APHIS has used the facilities for fertility control research.
- In 2012, the Secretary of the Interior directed the NPS to explore options for quarantine for Yellowstone bison. The purpose of quarantine is to (1) augment or establish new conservation/cultural herds, (2) enhance cultural and nutritional opportunities for Native Americans, and (3) reduce shipments of bison to slaughter.
- During 2012 to 2016, Yellowstone bison numbers increased to about 5,500 and biologists have observed high grazing intensities on summer ranges that may not be sustainable. There is a need to regulate bison numbers inside YELL unless and until there is additional tolerance for them to migrate and disperse outside the park.
- Culling bison from the population is necessary for the proper management of YELL under the NPS' statutory authorities. Shipments of bison to slaughter are disdained by the public and, as a result, bison managers have investigated alternatives such as quarantine to preserve valuable brucellosis-free bison for augmenting or creating new herds with the diverse genetics and unique adaptive capabilities inherent in Yellowstone bison.
- The Fort Peck tribes constructed a double-fenced quarantine facility, within a larger fenced pasture, that meets the specifications used by APHIS and the State of Montana during the quarantine feasibility study and agreed to use the same brucellosis testing requirements (as specified in the Uniform Methods and Rules developed by APHIS).

### Current Status

- Despite extensive discussions since March 2016, the State of Montana and APHIS remain steadfast that the shipment of Yellowstone bison through Montana to the Fort Peck Reservation cannot occur until bison have completed quarantine. They maintain the NPS should build and operate a quarantine facility within or near YELL.
- The NPS has prepared a decision document (i.e., FONSI) which is currently under review at the Intermountain Region. The NPS is not proposing to conduct quarantine within, or to release Yellowstone bison onto, lands under the jurisdiction of Montana. Rather, the NPS is proposing to conduct initial brucellosis testing inside YELL, which is an exclusive federal jurisdiction, and then send bison to the Fort Peck Reservation, which is a sovereign domestic-dependent nation, to complete the quarantine testing protocol.
- The Fort Peck tribes are frustrated the NPS has not released a decision document and by the State of Montana's and APHIS' refusal to allow the quarantine of bison at Fort Peck.
- The NPS is currently holding 24 male bison testing negative for brucellosis since March 2016 for relocation in the near future to the quarantine facility north of the park leased by APHIS. The bulls will complete quarantine (~1 year) and, eventually, be relocated to the Fort Peck Reservation. The Governor of Montana has agreed to this plan.

**Contact:** Daniel N. Wenk, Superintendent, Yellowstone National Park, (307) 344-2002, dan\_wenk@nps.gov  
**Last Updated:** Wednesday, March 8, 2017

## Briefing Statement FY 2017

**Bureau:** National Park Service  
**Issue:** Bison Grazing Effects on Northern Grasslands  
**Member:** General Interest  
**Park:** Yellowstone National Park

### Key Points:

- Bison numbers in northern Yellowstone have doubled since 2011, but migrating and dispersing bison are generally not tolerated in surrounding states. As a result, increasing bison densities in the park have led to concerns about high grazing intensities on some summer ranges that may not be sustainable over time.
- Research during 2012 to 2016 found bison grazing intensities in some grassland areas were higher than previously reported for elk, especially in dry areas. Consumption of vegetation exceeded 70% in some areas and the amount remaining at summer's end was approximately 30% of what was available in areas where grazing was excluded.
- Yellowstone and other members of the Interagency Bison Management Plan are implementing actions to substantially decrease the number of bison in northern Yellowstone this winter, using hunting in Montana and culling (primarily shipments to slaughter) to remove as many as 1,300 bison.
- Scientists are monitoring indicators and drivers of undesired plant community changes and will continue to evaluate the impacts of grazing by bison on plant productivity, species composition, and nutrient cycling.
- Yellowstone National Park is not a ranch with domesticated animals and human-controlled animal, nutrient, and water inputs, but rather a wilderness where untamed, free-roaming animals and natural processes with wide-ranging variations are allowed to prevail in an environment not dominated by humans.

### Background:

- Numbers of elk in northern Yellowstone exceeded 20,000 during the 1990s, which led to contentious debates about whether they were irreversibly damaging the landscape by removing too much vegetation, compacting soils, and reducing the diversity of plants. An independent investigation by the National Research Council concluded in 2002 that the grasslands were not overgrazed.
- The recovery of predators such as bears and wolves by the mid-2000s reduced numbers of northern Yellowstone elk by ~70%. Subsequently, bison numbers in northern Yellowstone quadrupled and intense grazing by bison in some areas such as the Lamar Valley rekindled the debate about grazing effects on grasslands. The transition from an elk- to a bison-dominated system on grassland communities is unprecedented and, thus, effects are unknown.
- Plants subject to excessive grazing may be unable to maintain leaf tissue growth, which makes overgrazed areas susceptible to loss of rare species, reduced productivity, increases in bare ground, loss of plant litter, and exotic vegetation introduction; thereby beginning a cascade of events that changes the state of the vegetation community.
- Invasion by exotic winter annuals such as cheatgrass, annual wheatgrass, and desert alyssum has occurred in some grassland and shrub land communities in northern Yellowstone, which has fundamentally changed those communities. Also, portions of the Lamar Valley were managed as hayfields during the early 20<sup>th</sup> century.

### Current Status:

- Bison were recently declared the national mammal. The Yellowstone population is considered the only ecologically and genetically viable population of plains bison in existence due to its large size, genetic diversity and purity, and continuous persistence in its original range.
- The State of Montana and the Society for Range Management have expressed concerns over grassland conditions in northern Yellowstone and the size of the bison population, calling for assessments of conditions by their scientists, drastic reductions in numbers of bison and elk, and the hunting of bison in the park.
- The Lacey Act of 1894 prohibits hunting and the possession or removal of wildlife from Yellowstone. Hunting in the park would affect the behavior of many wildlife species and drastically change the experiences of visitors.
- Scientists are monitoring grazing effects on grassland production and nutrient cycling at 16 sites in Yellowstone.
- Climate is the single most important driving factor of plant community composition in northern Yellowstone. Over the past 50 years, temperatures have warmed and precipitation has decreased in northern Yellowstone. Further warming could increase the combined effects of climate and grazing on grassland sustainability.

**Contact Person:** Daniel N. Wenk, Superintendent, Yellowstone National Park, 307/344-2002, dan\_wenk@nps.gov  
**Last Updated:** Wednesday, March 8, 2017



Wenk, Dan &lt;dan\_wenk@nps.gov&gt;

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## Bison overview BP

1 message

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**Masica, Sue** <sue\_masica@nps.gov>  
To: Dan Wenk <dan\_wenk@nps.gov>

Tue, Mar 14, 2017 at 10:24 AM

A few edits/comments. If you need to proceed with the others, please do so ... I didn't get them until this AM and have not had a chance to review in detail, and won't until noon California time.

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Sue Masica | National Park Service | Regional Director, Intermountain  
12795 W. Alameda Parkway | Lakewood, CO 80228 | (303) 969-2503



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**Bison Management Brief and Topics 03-14-17.doc**

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## Briefing Statement

**Bureau:** National Park Service  
**Issue:** Bison Issues (Population, Quarantine, Removal/Winter Operations)  
**Park Site:** Yellowstone National Park  
**Date:** March 2017

### Key Points:

- Bison management and the migration of bison outside of Yellowstone National Park (YELL) remains a contentious issue involving the National Park Service (NPS), State of Montana, Animal Plant Health and Inspection Service (APHIS), Native American tribes, U.S. Forest Service, and assorted stakeholder interests (livestock, conservation, animal rights).
- Bison are currently migrating to lower elevations in search of forage due to snow accumulation in the higher elevations of the park. Winter operations, including harvests in Montana outside the park and capture/culling in northern YELL, are being conducted pursuant to the Interagency Bison Management Plan (IBMP).
- Twenty-four male bison have been held in isolation at the Stephens Creek capture facility in northern YELL since March 2016, pending transfer to nearby quarantine pastures leased by APHIS. After completing a brucellosis surveillance period lasting 1 year, bison remaining test-negative will be transferred to, and released on, the Fort Peck Reservation in their wild conservation/cultural herd.
- As of March 13, about 460 bison have been harvested/removed, 660 shipped to slaughter, and another 100 are being held in the park's capture facility for shipment next week. Tribes transport bison to slaughter and distribute meat and hides to their members.
- Bison management requires communication and cooperation among multiple federal and state agencies and tribes with different mandates, philosophies, and treaties. Complicating any movement of bison outside the park are Montana and APHIS requirements about brucellosis-free certifications and a Montana executive order regarding state approval to transport bison on state roads. If those parties are in disagreement with NPS actions, they may reach out to DOI leadership for engagement.

### Background:

- Yellowstone bison are important due to their large population size, high genetic diversity, lack of interbreeding with cattle, and wild behaviors and adaptive capabilities like their ancestors.
- Many bison are infected with the disease brucellosis, which was introduced by cattle and induces abortions, reduces pregnancy rates, and poses a risk of transmission back to cattle.
- Brucellosis and concerns about property damage, human safety, and competition with cattle limit tolerance for bison outside Yellowstone and prevent relocations elsewhere to restore the species.
- Yellowstone bison have high reproductive and survival rates, with few animals perishing due to old age, predators, and severe winter conditions. Thus, some bison need to be culled from the population.
- Alternative strategies for bison management have been constrained by legal and administrative factors, including federal trust responsibilities to tribes, Montana statutes and executive orders having to do with brucellosis-free certification and state approval for any transport of bison within the state, and APHIS' "uniform methods and rules" with regard to protocols for quarantine.

### Current Population Size and Management Actions

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**Comment [s2]:**

**Comment [s3R2]:** This assumes transfer is automatic after a year Isn't it dependent on the EA getting approved?

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- The federal government and State of Montana are signatories to the IBMP, which they have implemented since 2001 to sustain a viable population of Yellowstone bison and reduce the risk of brucellosis transmission from bison to cattle.
- Bison numbers have almost doubled since 2008, and there are concerns that high grazing intensities on some summer ranges may not be sustainable over time. Population size was about 5,500 bison during summer 2016. To date, no cases of brucellosis transmission directly from Yellowstone bison to cattle have been detected. However, there have been at least 20 documented cases of transmission from infected wild elk to cattle in the Greater Yellowstone Area in the past 15 years.
- High bison densities can result in the migration of thousands of bison into Montana, which can overwhelm managers' abilities to maintain separation with cattle and protect people and property.
- Consistent with the IBMP, managers developed an operations plan to decrease bison numbers by 750 to 1,300 during the winter of 2017 through public and treaty harvests in Montana and culling in YELL at the Stephens Creek capture facility.
- The NPS has signed agreements with several tribes to provide them with bison for direct transfer to meat processing facilities and subsequent distribution to their members.
- The effectiveness of hunting in Montana has been limited by concentrations of hunters near the park boundary that prevent bison from distributing, wound bison, and cause safety issues.
- The shipment of bison to processing facilities is extremely controversial and generates negative publicity. The State of Montana and APHIS object because of the risk of brucellosis transmission; animal rights groups object on humane treatment grounds.

#### Development of a New Interagency Bison Management Plan

- The NPS and the State of Montana have entered into an agreement to co-lead the development of a new Yellowstone Bison Management Plan. There are also six cooperating agencies, including the U.S. Forest Service, the Confederated Salish and Kootenai Tribes, the Confederated Tribes of the Umatilla Indian Reservation, the Shoshone-Bannock Tribes, the Nez Perce Tribe, and the InterTribal Buffalo Council. The states of Wyoming and Idaho, as well as APHIS, declined to participate.
- The EIS is managed by the NPS, who is providing sole funding for the EIS effort at this time.
- Public scoping was initiated in 2015 that included ~~editing~~ a newsletter identifying alternative concepts. About 8,300 individual comments were received. Since that time, the NPS and Montana have met on several occasions to develop a range of alternatives for a Draft EIS.
- To assist with alternative development, the co-leads contracted the Udall Foundation, U.S. Institute on Environmental Conflict Resolution, to provide third-party, neutral facilitation and engagement services for the EIS process. The Udall Foundation completed a situational assessment of co-lead and cooperating agencies perspectives on bison management, and provided facilitation at one meeting between the NPS and Montana.

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**Current Status:**

- YELL will retain the 25 male bison in isolation at Stephens Creek until APHIS is ready for them to be transported to their leased quarantine pastures.
- Shipments of other captured bison to slaughter may continue through March.
- The Intermountain Region is prepared to complete its work on the quarantine Environmental Assessment and sign the Finding of No Significant Impact.
- The tribal hunt outside the park should largely end next week.
- Critical bison management issues-Bison Management Status, Bison Grazing Effects on Northern Grasslands, and Quarantine Program for Yellowstone Bison- (see attached)

**Comment [s4]:** Third bullet at the top says 24 male bison

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**Contact:**

Daniel N. Wenk, Superintendent (307) 344-2002 dan\_wenk@nps.gov

Pat Kenney, Deputy Superintendent, (307) 344-2003 pat\_kenney@nps.gov



White, P <pj\_white@nps.gov>

**(b)5 Draft-Deliberative**

1 message

White, P <pj\_white@nps.gov>

Wed, May 24, 2017 at 1:34 PM

To: Dan Wenk <dan\_wenk@nps.gov>, Patrick Kenney <pat\_kenney@nps.gov>, "Carpenter, Jennifer" <jennifer\_carpenter@nps.gov>, Pete Webster <pete\_webster@nps.gov>

Cc: Rick Wallen <rick\_wallen@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>

Attached for your reading pleasure. We will be revising this draft over the summer.



**(b)5 Draft-Deliberative**

110K

**(b)5 Draft-Deliberative**

*P. J. White, Rick Wallen, and Chris Geremia  
Yellowstone National Park, Mammoth, Wyoming*

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Wenk, Dan &lt;dan\_wenk@nps.gov&gt;

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**Fwd: Bison briefs**

1 message

**Dan Wenk** <dan\_wenk@nps.gov>

Thu, Jun 22, 2017 at 5:08 PM

To: Bert Frost &lt;Bert\_Frost@nps.gov&gt;, Sue Masica &lt;Sue\_Masica@nps.gov&gt;

The following two briefs. The first is a general bison brief as of June 5th. The second is directed toward Quarantine and the transfer of 24 bull bison from the Designated Surveillance Area (DSA) to the Quarantine facility at Fort Peck. It includes the positions of the parties and recommended talking points by the Secretary with Governor Bullock if the schedule a sidebar discussion.

Questions please let me know.

Dan Wenk  
Superintendent  
Yellowstone National Park  
(307) 344-2002  
>  
>

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**2 attachments****YELL\_BisonQuarantine\_Jun2017.docx**  
27K**Bison combined BP updated 06-05-17.docx**  
33K

## **Briefing Statement FY 2017**

**Bureau:** National Park Service (NPS)  
**Issue:** Quarantine Program for Yellowstone Bison  
**Park:** Yellowstone National Park (YELL)

### **Background**

- The NPS has proposed to transfer 24 male Yellowstone bison testing negative for brucellosis exposure since March 2016 from YELL to a facility on the Fort Peck Reservation for the completion of the quarantine testing protocol and eventual release on the Reservation. Bison transport would occur on highways through Montana.
- The actual risk of brucellosis transmission from these bison in quarantine to cattle is negligible because males do not transmit brucellosis, as well as the state-of-the-art facility, rigorous and proven testing protocol, and commitments from the Fort Peck tribes to collaborate with APHIS on further testing.
- Shipments of bison to slaughter are disdained by the public and, as a result, bison managers have investigated alternatives such as quarantine to preserve valuable brucellosis-free bison for augmenting or creating new herds with the diverse genetics and unique adaptive capabilities inherent in Yellowstone bison.
- The Fort Peck tribes constructed a double-fenced quarantine facility, within a larger fenced pasture, that meets the specifications used by APHIS and the State of Montana during a 2006-2010 quarantine study and agreed to use the same brucellosis testing requirements as specified in the Uniform Methods and Rules developed by APHIS.

### **Initial Positions of Other Parties**

- The State of Montana has maintained the shipment of Yellowstone bison through Montana to the Fort Peck Reservation is not allowed per Montana Code Annotated [MCA] 81-2-120 until the bison complete quarantine and are certified as brucellosis-free. Otherwise, Montana's livestock industry will be threatened.
- The Animal and Plant Health Inspection Service (APHIS) has maintained quarantine facilities must be located in or near YELL and approved by state and federal animal health officials per the Uniform Methods and Rules. Ongoing discussions between the Departments of Interior and Agriculture may have reduced this opposition.
- The Fort Peck tribes are frustrated the NPS has not released a decision document and by the State of Montana's and APHIS' refusal to allow the quarantine of bison at Fort Peck.

### **Talking Points**

- This is an important initiative coming from Secretary Zinke, not Yellowstone.
- The transfer of bison to the Fort Peck Reservation will be viewed by most people and media as a very positive step; especially compared to the outrage and negative publicity generated by shipping bison to slaughter.
- The Secretary is working with the Department of Agriculture, APHIS, to ensure the bison are suitable for transfer to Fort Peck and will not jeopardize the State of Montana's brucellosis-free status.
- The Secretary would like Governor Bullock's support on the transfer of these males to Fort Peck this summer to complete the full quarantine protocol (1 year) at the tribal facility.
- The Secretary will assure a Memorandum of Agreement is in place among the National Park Service, APHIS, State of Montana, and Fort Peck tribes to outline roles and responsibilities for testing and holding animals at the Fort Peck facility.
- The Secretary would like this initiative to be the start of a long-term quarantine program to transfer live Yellowstone bison to Fort Peck.

**Contact Person:** Daniel N. Wenk, Superintendent, 307/344-2002, dan\_wenk@nps.gov

**Last Updated:** June 22, 2017

## Briefing Statement      FY 2017

**Bureau:** National Park Service (NPS)  
**Issue:** Bison Issues (Population, Quarantine, Removal/Winter Operations)  
**Park:** Yellowstone National Park (YELL)

### Key Points

- The management of bison migrating outside YELL during winter remains a contentious issue involving the NPS, State of Montana, Animal Plant Health and Inspection Service (APHIS), Native American tribes, U.S. Forest Service, and other stakeholders (livestock, conservation, animal rights).
- Winter operations, including harvests in Montana and capture/culling in northern YELL, are conducted pursuant to an Interagency Bison Management Plan (IBMP). During 2017, approximately 1,276 bison were removed from the population, including 748 shipped to slaughter, 468 harvested in Montana, 34 male calves held for quarantine, and 26 otherwise removed (e.g., killing of animals wounded during hunts; vehicle strikes).
- Twenty-four male bison have been held in isolation at the Stephens Creek capture facility in northern YELL since March 2016 pending transfer to the Fort Peck Reservation for quarantine. After completing a brucellosis surveillance period lasting 1 year, bison remaining test-negative will be released on the Fort Peck Reservation in their wild conservation/cultural herd.
- Bison management requires communication and cooperation among multiple federal and state agencies and tribes with different mandates, philosophies, and treaties. Complicating any movement of bison outside the park are Montana and APHIS requirements about brucellosis-free certifications and a Montana executive order regarding state approval to transport bison on state roads. If those parties are in disagreement with NPS actions, they may reach out to DOI leadership for engagement.

### Background

- Yellowstone bison are important due to their large population size, high genetic diversity, lack of interbreeding with cattle, and wild behaviors and adaptive capabilities like their ancestors.
- Many bison are infected with the disease brucellosis, which was introduced by cattle and induces abortions, reduces pregnancy rates, and poses a risk of transmission back to cattle.
- Brucellosis and concerns about property damage, human safety, and competition with cattle limit tolerance for bison outside YELL and prevent relocations elsewhere to restore the species.
- Yellowstone bison have high reproductive and survival rates, with few animals perishing due to predators and severe winter conditions. Thus, some bison need to be culled from the population.
- Alternative strategies for bison management have been constrained by legal and administrative factors, including federal trust responsibilities to tribes, Montana statutes and executive orders, and APHIS' Uniform Methods & Rules with regard to protocols for quarantine.

#### Current Population Size and Management Actions

- The federal government and the State of Montana have implemented the IBMP since 2001 to sustain a viable population of Yellowstone bison, with no brucellosis transmission from bison to cattle. For comparison, 27 livestock herds in the Greater Yellowstone Area have been infected by wild elk since 1998.
- Bison numbers almost doubled to 5,500 bison during 2008 to 2016, leading to concerns that high grazing intensities on some summer ranges may not be sustainable over time. Also, the mass migration of bison into Montana can overwhelm efforts to protect people, cattle, and property.
- Managers removed approximately 1,276 bison from the population during winter 2017, primarily through public and treaty harvests in Montana and capture in YELL for shipment to slaughter. Tribes transfer bison to meat processing facilities and distribute the meat to their members.
- The shipment of bison to processing facilities is extremely controversial and generates negative publicity. However, the effectiveness of hunting has been limited by concentrations of hunters near the park boundary that prevent bison from distributing, wound bison, and cause safety issues.

#### Consideration of a Quarantine Program

- In 2012, the Secretary of the Interior directed YELL to explore developing and operating quarantine facilities for Yellowstone bison. Park managers drafted a Finding of No Significant Impact to implement quarantine with initial screening in the park and completion of APHIS' testing protocol on the Fort Peck Reservation.
- Montana maintains the shipment of bison to the Fort Peck Reservation is prohibited by state law until bison complete quarantine and are certified as brucellosis-free. Also, APHIS maintains quarantine facilities must be located in or near YELL and approved by animal health officials according to their 2003 Uniform Methods and Rules, which are directed at managing livestock.
- The NPS is at an impasse because Montana and APHIS have refused to allow bison quarantine on the Fort Peck Reservation. Also, DOI solicitors maintain the Secretary must conclude this impasse is preventing the carrying out of our statutory duties before bison can be transferred without agreement.
  - Departmental policies regarding state and federal relationships are set forth at 43 CFR Part 24. Such policies direct agencies to consult with states and comply with state permit requirements regarding the planned removal of surplus or harmful populations of wildlife and the disposition of these wildlife except in instances where the Secretary determines that such compliance would prevent him from carrying out his statutory responsibilities (*e.g.* 43 C.F.R. 24.4(i)(5)).
- The Fort Peck tribes are frustrated the NPS has not released a decision document and by the State of Montana's and APHIS' refusal to allow the quarantine of bison on the Fort Peck Reservation.
- YELL recommends issuing a Finding of No Significant Impact to conduct quarantine at the Fort Peck Reservation, while continuing negotiations with the State, APHIS, and the Tribes.

#### Development of a New Interagency Bison Management Plan

- The NPS and the State of Montana have entered into an agreement to co-lead the development of a new Yellowstone Bison Management Plan. The NPS is funding the effort.
- There are six cooperating agencies, including the U.S. Forest Service, Confederated Salish and Kootenai Tribes, Confederated Tribes of the Umatilla Indian Reservation, Shoshone-Bannock Tribes, Nez Perce Tribe, and InterTribal Buffalo Council. The states of Wyoming and Idaho, as well as APHIS, declined to participate.
- Public scoping was initiated in 2015, with 8,300 individual comments received. Since that time, the NPS and Montana have met several times to develop a range of alternatives for a draft Environmental Impact Statement.
- There has been little agreement on many facets of bison management, both under the existing IBMP and in this new planning process. Montana has two agencies involved, the Department of Livestock and Fish, Wildlife & Parks, which differ in their perspectives on bison management. This has made it difficult to come to agreement on a range of alternatives, tools for management, and overall objectives and goals.
- In addition, relationships are strained due to the conflict over the NPS bison quarantine proposal and current management under the existing IBMP. There may need to be a reevaluation of goals and objectives, as well as renewed State of Montana commitment, to a new bison management plan to move forward.

#### **Current Status**

- Biologists at YELL will conduct post-calving counts of bison in the central and northern regions of the park during June and July. These counts will be used to determine the appropriate levels of removals next winter to continue to decrease population size towards 4,200 bison.
- YELL will retain the 24 male bison in isolation at Stephens Creek until an option for quarantine is determined. Options include: 1) sending the bison to the Fort Peck Reservation for quarantine (preferred); 2) sending the bison to pastures leased by APHIS in Corwin Springs, Montana for quarantine; and 3) conducting quarantine at the Stephens Creek capture facility in YELL.
- The Intermountain Region is prepared to complete its work on the quarantine Environmental Assessment and sign the Finding of No Significant Impact.

**Contact Person:** Daniel N. Wenk, Superintendent, 307-344-2002, dan\_wenk@nps.gov

**Last Updated:** June 5, 2017



White, P &lt;pj\_white@nps.gov&gt;

---

**Strategic Mtg - save the date**

2 messages

---

**Reid, Tim** <tim\_reid@nps.gov>

Thu, Jan 25, 2018 at 2:30 PM

To: PJ White <pj\_white@nps.gov>, jennifer\_carpenter <jennifer\_carpenter@nps.gov>, Rick Wallen <rick\_wallen@nps.gov>, Pete Webster <pete\_webster@nps.gov>, "Lyle, Jody" <jody\_lyle@nps.gov>  
Cc: Dan Wenk <dan\_wenk@nps.gov>, Patrick Kenney <pat\_kenney@nps.gov>

**(b)5 Draft-Deliberative**



Jody - I believe that Strat Comm has an obvious role in this...you or Morgan in the room will ensure that the leaders intent, issue/sub-issue background and nuance are clear.

Stay tuned. It may be that I ask for a short notice/short duration confab on Monday.

Tim

---

Tim Reid

Superintendent

Devils Tower National Monument

307/467-5283 x213

---

**White, P** <pj\_white@nps.gov>

Thu, Jan 25, 2018 at 3:04 PM

To: "Reid, Tim" <tim\_reid@nps.gov>, Dan Wenk <dan\_wenk@nps.gov>, jennifer\_carpenter <jennifer\_carpenter@nps.gov>, Pete Webster <pete\_webster@nps.gov>, Patrick Kenney <pat\_kenney@nps.gov>, "Lyle, Jody" <jody\_lyle@nps.gov>  
Cc: Rick Wallen <rick\_wallen@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>, Kerrie Evans <Kerrie\_Evans@nps.gov>

The latest revision of the strategic plan framework is attached.

[Quoted text hidden]

1/25/2018

DEPARTMENT OF THE INTERIOR Mail - Strategic Mtg - save the date

--

P. J. White  
Chief, Wildlife and Aquatic Resources  
Yellowstone National Park  
Mammoth, Wyoming 82190  
Office: 307/344-2442

NOTE: *Every email I send or receive is subject to release under the Freedom of Information Act.*



**BisonMgmtStrategy\_QuarantineRecommendations\_Jan2018\_v2.docx**

32K

## Briefing Statement FY 2018

**Bureau:** National Park Service (NPS)

**Issue:** Long-Term Bison Management Strategy, including Quarantine

**Park:** Yellowstone National Park (YELL)

- Population size
  - (b)5 Draft Deliberative
  - Maintain the historic lineages (indigenous, Pablo-Allard) and existing genetic diversity (b)5 Draft Deliberative
- Culling
  - Make capture, culling, shipping, and distribution operations a shared commitment among the agencies (b)5 Draft
  - e
- Hunting
  - (b)5 Draft Deliberative
  - When possible, use hunters to harvest bison that move outside the northern and western management areas
- Quarantine
  - Implement a quarantine program that provides brucellosis-free bison for relocation to public and tribal lands
  - Use the Stephens Creek facility in northern YELL to conduct brucellosis screenings for quarantine (b)5
  - (b)5 Draft and complete the testing protocol at Corwin Springs and/or Fort Peck (see attached Scope of Work) (b)5 Draft
  - Continue to refine quarantine procedures, including testing frequency and duration, as data become available
- Tolerance and relocation
  - (b)5 Draft Deliberative
- Conflict resolution
  - Identify likely conflict areas for targeted surveillance and monitoring, and initiate conflict resolution activities when necessary
  - Use targeted fencing, hazing, and hunting to maintain separation between bison and cattle and protect people and property (similar to elk)
  - Capture or kill bison that cannot be hazed or pose an imminent risk to humans, property, or livestock
  - Coordinate with the State of Montana to reduce nighttime speed limits and vehicle strikes of wildlife on Highways 89 and 191
- Brucellosis
  - No brucellosis suppression actions would be taken, but collaborative research on brucellosis dynamics, diagnostic procedures, and various potential suppression methods would be conducted
  - Continue to manage the already low risk of brucellosis transmission from bison directly to cattle
  - Monitor brucellosis exposure and culture rates over time
- Organization and Involvement
  - (b)5 Draft Deliberative
  - Continue to hold quarterly meetings with local officials (e.g., county commissioners)
  - Continue to hold public meetings and consider workshops on relevant management issues

## Scope of Work, Bison Quarantine, 2018-2019

### Stephens Creek

- APHIS certify the two double-fenced pastures as a quarantine facility
- NPS capture, test, and isolate ~20 yearling females and ~40 male calves testing negative for brucellosis
  - NPS uniquely mark each animal with RFID tags approved by APHIS and the Montana State Veterinarian
- NPS complete serial testing every 30-45 days until no new test-positive animals are identified for two successive testing periods (b)5 Draft Deliberative
  - NPS perform two screening tests (BAPA, CARD) and one confirmatory test (FPA) on-site and place a unique back tag identifier on each bison during each testing occasion
  - NPS remove bison testing suspect or positive using the onsite confirmatory test (FPA) into a separate holding (suspect) pen.
    - Keep animals in this pen and test at least one additional time every 30-45 days
  - NPS submit serum samples from bison to the Montana Veterinary Diagnostic Laboratory and request two screening tests (BAPA, CARD) and two confirmatory tests (FPA, Complement Fixation)
  - NPS interpret results with APHIS and determine bison disposition, which would include consignment of test-positives to slaughter and/or holding suspect animals in a separate pasture for further testing
  - NPS consign bison testing positive or repeatedly testing suspect to slaughter and collect mandibular, parotid, retropharyngeal, mesenteric, hepatic, and internal iliac lymph nodes along with a piece of spleen tissue
    - Submit these samples to the National Veterinary Services Laboratories for culture assays
  - NPS maintain appropriate records to allow bison repeatedly testing negative to be certified as brucellosis free, including copies of SV-2A forms and serology and culture results
- NPS move bison continuing to test negative for brucellosis exposure to quarantine facilities in Corwin Springs and/or on the Fort Peck Reservation to undergo the appropriate quarantine testing protocol for bison by age and sex as described in the 2003 Uniform Methods and Rules (APHIS 91-45-013)<sup>1</sup>
  - These transfers should occur prior to the potential transmission period beginning about January 1<sup>st</sup>
- At the end of the quarantine testing period, APHIS and the Montana State Veterinarian certify bison remaining test-negative as brucellosis free and vaccinate them before they are released or relocated elsewhere
  - An additional blood test is recommended between 6 and 12 months after these bison are released
- If any of the 52 bison that were illegally released from the isolation pastures during January 2018 are recaptured, either transport them to Corwin Springs and/or Fort Peck to undergo quarantine or release them
  - These male bison are reaching adult size and will be hard to hold for another 1½ years at Stephens Creek

### Fort Peck Reservation

- APHIS certify the double-fenced pastures as a quarantine facility

(b)5 Draft Deliberative

- At the end of the quarantine testing period, APHIS and the Montana State Veterinarian certify bison remaining test-negative as brucellosis free and vaccinate them before they are released on the Fort Peck Reservation
  - An additional blood test of all bison is recommended 6 and 12 months after they are released

<sup>1</sup> Portions of the Uniform Methods and Rules pertaining to quarantine were adopted for the confinement and testing of Yellowstone bison. However, the use of these rules should not be construed to indicate wild bison are subject to, or bound by, federal or state livestock regulations.

#### Corwin Springs

- Per previous agreements with the NPS, APHIS is responsible for putting ~62 test-negative bison in double-fenced pastures at Corwin Springs, Montana (north of YELL) through quarantine over the next several years
  - APHIS has committed to providing ~\$100,000 over the next three years, which is well below the projected cost of about \$700,000 total over the next five years to complete quarantine for these bison
  - Montana maintains bison undergoing quarantine at Corwin Springs are subject to MCA 81-2-120 and 87-1-216, which gives the State Veterinarian authority over their final disposition and requires Fish, Wildlife & Parks to approve a bison transfer and relocation plan; the NPS would no longer be involved in decisions
- APHIS has had discussions with Colorado State University and several non-governmental organizations about this effort and, in turn, these organizations contacted YELL about fund raising and financial accounting through the park's partner organization (Yellowstone Forever)

(b)5 Draft Deliberative





White, P <pj\_white@nps.gov>

---

## Bison science and governance manuscript

1 message

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White, P <pj\_white@nps.gov>

Wed, Mar 14, 2018 at 11:52 AM

To: Rick Wallen <rick\_wallen@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>

Cc: "Carpenter, Jennifer" <jennifer\_carpenter@nps.gov>, Tim Reid <tim\_reid@nps.gov>

Revision attached for your review and comments before submission to the journal *Policy Sciences*. Thanks.

--  
P. J. White  
Chief, Wildlife and Aquatic Resources  
Yellowstone National Park  
Mammoth, Wyoming 82190  
Office: 307/344-2442

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

**(b)5 Draft-Deliberative**

1234

(b)5 Draft-Deliberative

*P. J. White<sup>1</sup>, Rick Wallen, and Chris Geremia  
National Park Service, Yellowstone National Park, Mammoth, Wyoming*

(b)5 Draft-Deliberative

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(b)5 Draft-Deliberative



White, P <pj\_white@nps.gov>

**Re: information about bison numbers**

2 messages

Reid, Tim <tim\_reid@nps.gov>

Fri, Mar 23, 2018 at 10:09 AM

To: "Lyle, Jody" <jody\_lyle@nps.gov>

Cc: Dan Wenk <Dan\_Wenk@nps.gov>, "Herbert, Neal" <Neal\_Herbert@nps.gov>, Morgan Warthin <morgan\_warthin@nps.gov>, PJ White <pj\_white@nps.gov>

Jody - I think it looks good. Per my conversation with you, PJ, and Rick....my stab at teeing up the concept that collar data indicating most bison in or moving to basin in mid-feb were northern range bison, the target for reduction.

*Given the low reported harvest of bison north of YNP by mid-February, and telemetry data indicating that the preponderance of bison present or staged to move in to the Gardiner basin were affiliated with breeding in the northern portion of the park, the NPS began capturing bison at Stephens Creek on February 16, 2018. Winter conditions contributed to a relatively large bison migration into the Gardiner basin during late February and March, a condition that only happens a few times per decade. About 800 bison were captured at Stephens Creek over a 3-week period, while another 800 bison occupied the Gardiner Basin from Mammoth Hot Springs to Yankee Jim Canyon.*

*or*

*The NPS began capturing bison at Stephens Creek on February 16, 2018, given the low reported harvest of bison north of YNP by mid-February, and telemetry data indicating that the preponderance of bison present or staged to move in to the Gardiner basin were affiliated with breeding in the northern portion of the park.*

Regardless whether included or not, it was part of the calculus.

Tim

Tim Reid  
Bison Management Coordinator  
Yellowstone National Park  
O: 307/344-2035  
C: 307/281-1343

On Fri, Mar 23, 2018 at 9:24 AM, Lyle, Jody <jody\_lyle@nps.gov> wrote:

Dan, Tim, Morgan, Neal - Per our conversation this morning, here is the text I'm proposing we use from PJ's briefing paper when we get press calls about this today or early next week. Dan, I made the changes you requested. Anyone see anything we should fix? If not, we'll hold this until we get questions.

*During September 2017, Yellowstone National Park recommended removing up to 1,250 bison breeding in the northern portion of Yellowstone National Park (YNP) to decrease overall bison numbers to about 4,200 to 4,400 after calving during summer 2018. We recommended not removing or harvesting bison migrating west of the park due to decreasing numbers of bison breeding in the central portion of the park during recent years, and to focus harvest and capture on bison breeding in the northern portion of the park.*

*In December 2017, managers of the Interagency Bison Management Plan signed a winter operations plan that included "optimize hunter harvest take while assuring combined hunt/trap take of 600 bison to 900 bison." Direction from leaders of the U.S. Department of the Interior and the National Park Service (NPS) was to decrease bison numbers during 2017-2018 and subsequent winters towards a range of 3,500 to 4,200 at the end of each winter, which translates to about 3,800 to 4,500 bison after calving.*

*During December 2017, public and treaty hunters began harvesting bison west of YNP, ignoring NPS recommendations. Also, reported harvests of bison north of YNP lagged well behind monthly removal goals defined in the winter operations plan:*

- 75-115 by the end of November 2017 (reported harvest in north was 8 bison by December 7, 2017)*
- 225-335 by the end of December 2017 (reported harvest in north was 8 bison by January 8, 2018)*
- 372-560 by the end of January 2018 (reported harvest in north was 21 by February 2, 2018)*
- 522-785 by the end of February 2018 (reported harvest in north was 146 by March 8, 2018)*
- 600-900 by March 15, 2018 (reported harvest in north was 206 bison by March 14, 2018)*

*Given the low reported harvest of bison north of YNP by mid-February, the NPS began capturing bison at Stephens Creek on February 16, 2018. Winter conditions contributed to a relatively large bison migration into the Gardiner basin during late February and March, a condition that only happens a few times per decade. About 800 bison were captured at Stephens Creek over a 3-week period, while another 800 bison occupied the Gardiner Basin from Mammoth Hot Springs to Yankee Jim Canyon.*

*Approximately 695 bison will be shipped to slaughter by the end of winter 2018, and 4 bison died in holding pens. Another 98 yearling bison (25 females; 73 males) testing negative for brucellosis exposure were moved to isolation pastures for further testing to identify test groups for quarantine.*

*As of March 21, 2018, about 248 bison were reported harvested north of YNP (including 5 wounded/dispatched and 3 poaching) and 87 bison were reported harvested west of YNP (including 1 discarded/left). Hunters were more successful after capture operations began, with about 172 bison harvested during the month after the first capture of bison, while only about 77 bison were harvested during the 30 days prior to capture. Also, many harvests north of YNP occurred, or were reported, after March 11, 2018, when bison captures at Stephens Creek ended.*

*In total, about 1,132 bison will be removed from the Yellowstone bison population during winter 2017-2018 -- 699 captured/shipped/pen mortality; 335 harvested (248 on the north side, 87 on the west side); and 98 captured/quarantine. As noted, this total includes at least 87 bison harvested west of YNP that did not contribute to the goal of decreasing bison numbers breeding in northern YNP.*

*Overall bison abundance after calving during summer 2018 is forecast to be about 4,300 +/- 500 bison, which is in accordance with guidance from U.S. Department of the Interior and NPS leadership, as well as recommendations from biologists at YNP given the current limited tolerance for bison outside the park. If this projection is realized, the summer count of bison during 2018 is expected to meet the NPS objective of less than 4,500 bison for the first time since 2012.*

**Jody Lyle**

Chief, Office of Strategic Communications  
Yellowstone National Park  
307-344-2012 (office)  
406-589-7712 (cell)

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3/23/2018

DEPARTMENT OF THE INTERIOR Mail - Re: information about pension numbers

**Lyle, Jody** <jody\_lyle@nps.gov>

To: "Reid, Tim" <tim\_reid@nps.gov>

Fri, Mar 23, 2018 at 10:32 AM

Cc: Dan Wenk <Dan\_Wenk@nps.gov>, "Herbert, Neal" <Neal\_Herbert@nps.gov>, Morgan Warthin <morgan\_warthin@nps.gov>, PJ White <pj\_white@nps.gov>

Thanks Tim. I think the first version works best. We'll make the change.

**Jody Lyle**

Chief, Office of Strategic Communications

Yellowstone National Park

307-344-2012 (office)

406-589-7712 (cell)

Visit us online: [Official Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#) | [Flickr](#) | [YouTube](#) | [Periscope](#)

[Quoted text hidden]



White, P &lt;pj\_white@nps.gov&gt;

## Recommendations for Bison Conservation and Management

3 messages

**White, P** <pj\_white@nps.gov>

Fri, Apr 6, 2018 at 12:04 PM

To: Dan Wenk <dan\_wenk@nps.gov>, "Carpenter, Jennifer" <jennifer\_carpenter@nps.gov>, Tim Reid <tim\_reid@nps.gov>, Pete Webster <pete\_webster@nps.gov>, Patrick Kenney <pat\_kenney@nps.gov>  
Cc: Rick Wallen <rick\_wallen@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>

Attached are recommendations which outline a strategy for NPS management actions with bison. If we can agree to a revision, then I can prepare an environmental assessment within 1-2 weeks. Thanks.

--  
P. J. White  
Chief, Wildlife and Aquatic Resources  
Yellowstone National Park  
Mammoth, Wyoming 82190  
Office: 307/344-2442

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

**BisonConservation\_ExecutiveSummary\_RevisedApr2018.docx**

45K

**Wallen, Rick** <rick\_wallen@nps.gov>

Fri, Apr 6, 2018 at 3:56 PM

To: "White, P" <pj\_white@nps.gov>  
Cc: Dan Wenk <dan\_wenk@nps.gov>, "Carpenter, Jennifer" <jennifer\_carpenter@nps.gov>, Tim Reid <tim\_reid@nps.gov>, Pete Webster <pete\_webster@nps.gov>, Patrick Kenney <pat\_kenney@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>

There you go again PJ... channeling your inner Cool Hand Luke. We can all see you from here, standing in the rain, talking to yourself.

This is absolutely the right message to share. Thank you for hoisting the guide on!

I think you know my thoughts here already. I am feeling a lot like Phil Connor, and that makes today February the 2nd. I am a bit numb from seeing this proposal so many times I don't know how to respond now.

I recommend that we gather the first five folks on the **send to** list and go through this proposal with an ear for discussion about the key topics. We should be able to do this in one to 1 1/2 hours max. This would be an excellent preparation for the upcoming IBMP meeting and prepare park leadership to decide whether we have a theme to work from on 25 April.

RW

[Quoted text hidden]

**Tim Reid** <tim\_reid@nps.gov>

Fri, Apr 6, 2018 at 4:16 PM

To: "Wallen, Rick" <rick\_wallen@nps.gov>  
Cc: "White, P" <pj\_white@nps.gov>, Dan Wenk <dan\_wenk@nps.gov>, "Carpenter, Jennifer" <jennifer\_carpenter@nps.gov>, Pete Webster <pete\_webster@nps.gov>, Patrick Kenney <pat\_kenney@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>

I like it.

Sent from my iPhone

[Quoted text hidden]

April 6, 2018

INFORMATION MEMORANDUM

To: Dan Wenk, Superintendent, Yellowstone National Park  
Through: Jennifer Carpenter, Director, Yellowstone Center for Resources  
From: P. J. White, Rick Wallen, and Chris Geremia, Yellowstone Center for Resources  
Subject: Recommendations for the Conservation and Management of Yellowstone Bison

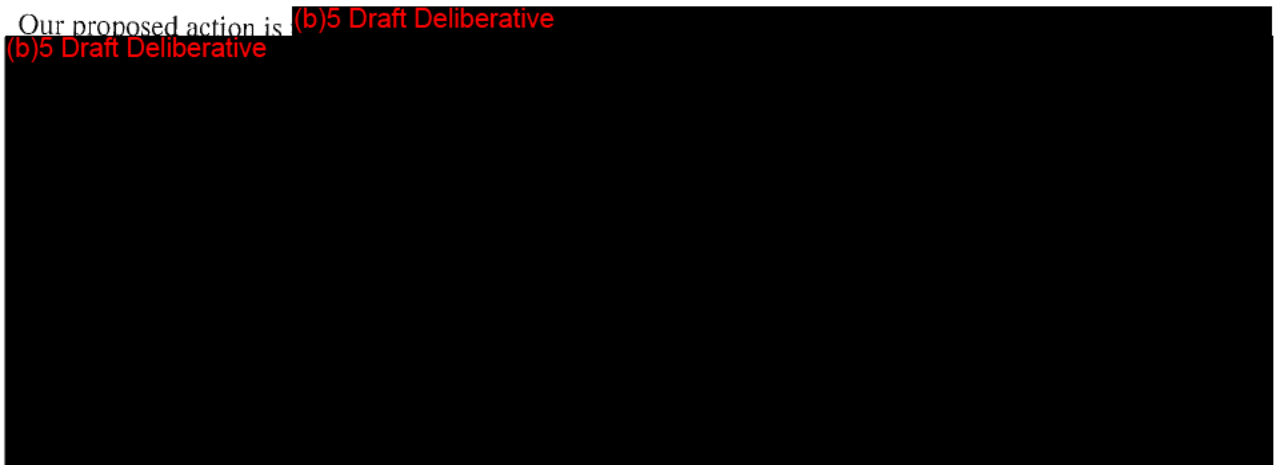
A decision regarding whether the National Park Service (NPS) should initiate an alternate management paradigm for wild bison within and near Yellowstone National Park (YNP) is needed because:

- Bison numbers in the northern portion of YNP have increased in recent years, but there is limited capacity and forage for bison within the park;
- There is limited tolerance for bison migration into surrounding states due to concerns about competition with cattle, brucellosis transmission to cattle, human safety, and property damage.
- There is substantial new information and changed circumstances since the Interagency Bison Management Plan began being implemented in 2001 to reduce brucellosis transmission risk while conserving a viable population of Yellowstone bison; and
- There are persistent disputes among federal, state, and tribal agencies regarding issues related to authority, priorities, and sovereignty that impede efforts by the NPS to recover bison across a larger landscape and treat them more like other wildlife (as wanted by the majority of the public).

Recognizing these circumstances, which are unlikely to change in the near future, we considered alternate management paradigms for wild bison and the non-native disease brucellosis within and near YNP. The following recommendations (Table 1) for bison conservation and management in and near YNP would sustain a population of wild Yellowstone bison that should be allowed to move across suitable public lands like other wildlife, while protecting the public trust, respecting private property and people's livelihoods, and supporting tribal treaty hunts of bison outside the park. Specific NPS objectives are to:

- Preserve a wild, wide-ranging population with seasonal migration to low-elevation winter ranges and dispersal to other suitable public lands;
- Contribute to maintaining the already low risk of brucellosis transmission from bison directly to cattle in surrounding states and, as necessary; and
- Adjust bison abundance to lessen adverse impacts from high densities of bison on other natural resources and reduce conflicts with human safety and property damage.

Our proposed action is (b)5 Draft Deliberative  
(b)5 Draft Deliberative



**(b)5 Draft-Deliberative**



**(b)5 Draft-Deliberative**



4/17/2018

DEPARTMENT OF THE INTERIOR Mail - Bison strategy meeting on Thursday



White, P <pj\_white@nps.gov>

---

## Bison strategy meeting on Thursday

1 message

---

White, P <pj\_white@nps.gov>

Tue, Apr 17, 2018 at 10:47 AM

To: Dan Wenk <dan\_wenk@nps.gov>, "Carpenter, Jennifer" <jennifer\_carpenter@nps.gov>, Tim Reid <tim\_reid@nps.gov>, Pete Webster <pete\_webster@nps.gov>, Patrick Kenney <pat\_kenney@nps.gov>, Rick Wallen <rick\_wallen@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>

Cc: Kerrie Evans <Kerrie\_Evans@nps.gov>

see attached proposal

--

P. J. White  
Chief, Wildlife and Aquatic Resources  
Yellowstone National Park  
Mammoth, Wyoming 82190  
Office: 307/344-2442

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.



**BisonConservation\_ExecutiveSummary\_RevisedApr2018\_v3.docx**

41K

April 17, 2018

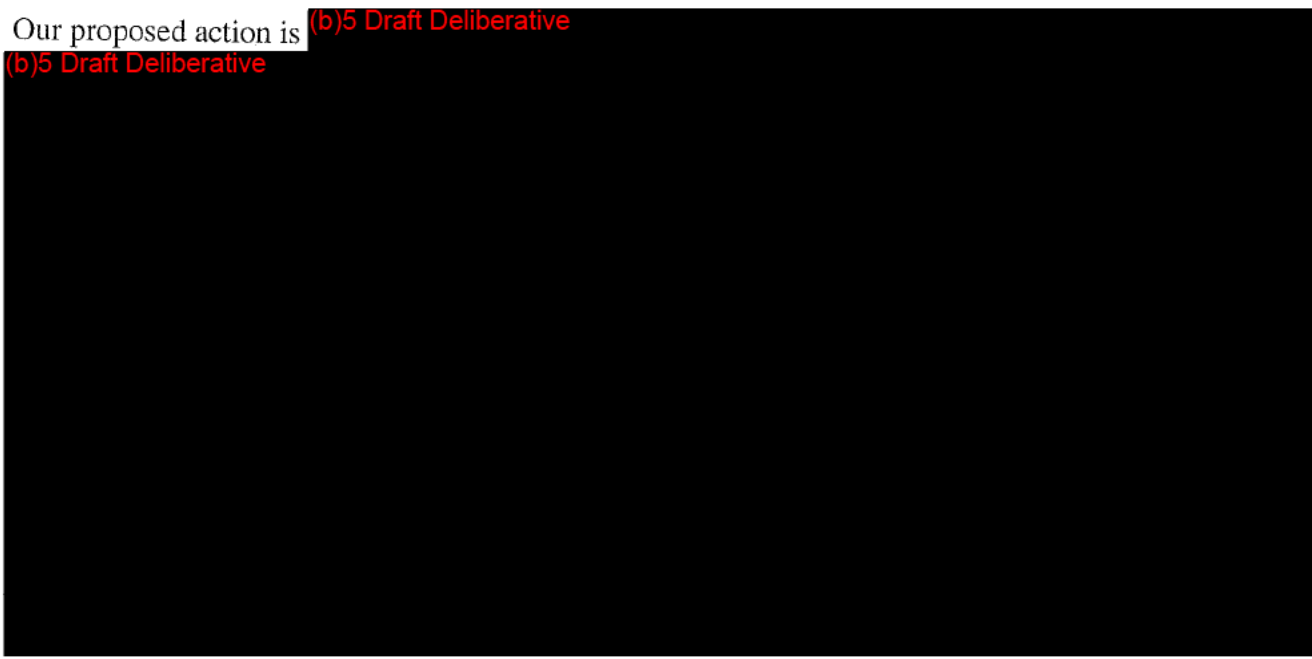
INFORMATION MEMORANDUM

To: Dan Wenk, Superintendent, Yellowstone National Park  
From: P. J. White, Rick Wallen, and Chris Geremia, Yellowstone Center for Resources  
Subject: Recommendations for the Conservation and Management of Yellowstone Bison

The National Park Service (NPS) is considering alternate management paradigms to sustain the viable population of wild, wide-ranging bison within and near Yellowstone National Park (YELL). The chosen management approach should (1) maintain the processes of migration and dispersal, (2) maintain existing genetic diversity and historic lineages, (3) contribute to a low risk of brucellosis transmission from bison directly to cattle and, as necessary, (4) regulate bison abundance to lessen adverse impacts to other natural resources and reduce conflicts with humans. A decision regarding whether the NPS should initiate an alternate management paradigm for wild, wide-ranging bison within and near YELL is needed because:

- Bison numbers in the northern portion of YELL have increased in recent years, but there is limited capacity and forage for bison within the park;
- There is limited tolerance for bison migration into surrounding states due to concerns about competition with cattle, brucellosis transmission to cattle, human safety, and property damage;
- There are changed circumstances and substantial new information regarding bison ecology and brucellosis dynamics in bison and elk since the Interagency Bison Management Plan began being implemented in 2001; and
- There are persistent disputes among federal, state, and tribal agencies regarding issues related to authority, priorities, and sovereignty that impede efforts by the NPS to recover bison across a larger landscape and treat them more like other wildlife (as wanted by the majority of the public).

Our proposed action is (b)5 Draft Deliberative  
(b)5 Draft Deliberative



**(b)5 Draft-Deliberative**



4/20/2018

DEPARTMENT OF THE INTERIOR Mail - Environmental Assessment: Conservation and Management of Yellowstone Bison



White, P <pj\_white@nps.gov>

## Environmental Assessment: Conservation and Management of Yellowstone Bison

1 message

White, P <pj\_white@nps.gov>

Fri, Apr 20, 2018 at 12:37 PM

To: Dan Wenk <dan\_wenk@nps.gov>, "Carpenter, Jennifer" <jennifer\_carpenter@nps.gov>, Tim Reid <tim\_reid@nps.gov>, Pete Webster <pete\_webster@nps.gov>, Rick Wallen <rick\_wallen@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>, "McPadden, Raymond" <raymond\_mcpadden@nps.gov>

The attached EA evaluates the new strategy we discussed yesterday, as well as 3 other alternatives that we considered during scoping for the new EIS.

--

P. J. White  
Chief, Wildlife and Aquatic Resources  
Yellowstone National Park  
Mammoth, Wyoming 82190  
Office: 307/344-2442

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.



**BisonConservationManagementEA\_Apr2018.doc**

716K

**National Park Service  
U.S. Department of the Interior**



**Yellowstone National Park  
Idaho, Montana, Wyoming**

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**Conservation and Management of Yellowstone Bison**

Environmental Assessment

April 20, 2018

(b)5 Draft-Deliberative

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White, P <pj\_white@nps.gov>

---

## IBMP PPT

1 message

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Reid, Tim <tim\_reid@nps.gov>

Fri, Apr 20, 2018 at 11:31 AM

To: Dan Wenk <dan\_wenk@nps.gov>, jennifer\_carpenter <jennifer\_carpenter@nps.gov>, PJ White <pj\_white@nps.gov>, Rick Wallen <rick\_wallen@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>

Attached is a draft ppt for the IBMP mtg. This is based off of a draft template that Rick generated. It includes some updated numbers and additional discussion points. Please edit/comment as you see fit. The summary numbers slide reflects our discussion (sans Dan) from yesterday.

Thx -

Tim

---

Tim Reid  
Bison Management Coordinator  
Yellowstone National Park  
O: 307/344-2035  
C: 307/281-1343



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BisonSlides\_IBMP\_WinterOps\_NPS\_4-20v1.pptx  
806K

# **NPS Recommendations 2017**

**~4,800 bison: ~3,970 north/~850 central**

- Remove up to 1,250 bison breeding in north**
- Decrease numbers to 4,200-4,400 after calving**
- No removals in west due to lower numbers**
- Allow bison to distribute on landscape and hunt**
- Maintain 250-400 bison in Gardiner basin**
- Begin culling bison in north when migration deemed sufficient to support hunting and culling**
- Conduct larger culls if there is a larger migration**

# **17/18 Winter Operations Plan**

**Manage for a decreasing population**

- **Optimize harvest while assuring combined hunt/cull take of 600 to 900 bison**
- **Reduce impacts of bison captures on hunt**
- **Monthly removal goals:**
  - **75-115 by the end of November**
  - **225-335 by the end of December**
  - **372-560 by the end of January**
  - **522-785 by the end of February**
  - **600-900 by March 15**

# Harvests

**December 2017:** Hunters began harvesting bison west of the park (NPS recommended zero)

**Removal goals/reported harvests (north):**

- **November 30: Goal = 75-115; Harvest = 8**
- **December 31: Goal = 225-335; Harvest = 8**
- **January 31: Goal = 372-560; Harvest = 21**
- **February 28: Goal = 522-785; Harvest = 146**
- **March 15: Goal = 600-900; Harvest = 206**

➤ **Reported harvests lagged well behind removal goals by mid-February**

# Captures/Culls

- Winter conditions led to a large migration into Gardiner basin during late February/March
- NPS began capturing on February 16 and captured ~800 bison over a 3-week period
- Another 800+ bison in the Gardiner basin (Mammoth-Yankee Jim) during captures
- NOTES:
  - Harvest higher after captures began (77 bison harvested 30 days before; 172 after)
  - Many harvests and reports after March 11, when captures ended

# Harvests and Culls

|   | MT/<br>NPS   | CSKT   | Nez<br>Perce | ShoBan    | CTUR      | Yakama    | BFN       |
|---|--------------|--|--------------|-----------|-----------|-----------|-----------|
| <b>Hunt (372)</b>                               |              |  |              |           |           |           |           |
| <b>North</b>                                    | 37*          | 2  | 111          | 35        | 28        | 40        | 32        |
| <b>West</b>                                     | 22*          | 45   | 4            | 2         | 0         | 8         | 6         |
| <b>Subtotal</b>                                 | <b>59</b>    | <b>47</b>  | <b>115</b>   | <b>37</b> | <b>28</b> | <b>48</b> | <b>38</b> |
| * includes 6 dispatched, 3 poached, 1 abandoned |              |  |              |           |           |           |           |
| <b>Cull (796)</b>                               |              | Transferred to the CSKT for processing<br>Includes 25 female and 73 male yearlings |              |           |           |           |           |
| <b>Slaughter</b>                                | 694          |  |              |           |           |           |           |
| <b>Quarantine</b>                               | 98           |  |              |           |           |           |           |
| <b>Pen Mort</b>                                 | 4            |  |              |           |           |           |           |
| <b>Total</b>                                    | <b>1,168</b> | 2018: Harvest 32%; Culls 68%<br>2012-2017: Harvest 50%; Culls 50%                  |              |           |           |           |           |

# WHY > 600-900

- Winter severity exceeded predictions.
- Unusually large migration in late February allowed continued capture and hunter success with > 500 bison north of park at times.
- Telemetric data indicating that bison migrating into Gardiner bison were associated with the northern breeding area.
- NPS holds that a long-term average of ~4,200 bison allows balance of myriad demands/values surrounding bison and provides opportunity for progress on issues that have been difficult to advance, including:
  - Full dispersal into the conservation area
  - Reduced hunting pressure near boundary/better hunt success and optics
  - Mitigation of capture/hunt conflict
  - Reduction of cull size and shipments to slaughter
- The removal of 1,100+ bison provided the highest chance of a summer 2018 count near 4,200 bison compared to other alternatives.
  - Summer 2018: Predict ~4,200 +/- 500 bison post-calving
  - <4,500 bison for the first time since 2012

# Conclusions/Considerations

The combined use of hunting and culling over the past six years has reduced bison numbers toward the NPS objective (4,200), while supporting hunter harvest (41% of removals/no >800 to slaughter in any one winter).

Future removals to stabilize population growth could be one-half of what was necessary to reduce the population size (i.e., 400-500 instead of 1,000 – 1,200).

## Consider:

Removal of fewer bison via capture/culling can shift focus to reducing hunt pressure near boundary and advance other efforts:

- As outlined in the 2000 IBMP ROD, establish temporary capture facilities near Yankee Jim Canyon. Facilitates bison distribution over available landscape, habitat learning, and a dispersed hunt.
- Limit capture at Stephens Creek primarily to support quarantine or research.
- Utilize quarantine facilities at Stephens Creek, Corwin Springs, and Fort Peck Reservation to reduce shipments to slaughter.

**From:** [Dan Wenk](#)  
**To:** [Dave Mihalic](#)  
**Subject:** Bison habitat  
**Date:** Wednesday, May 16, 2018 1:04:19 PM

---

Dave,

The information below is from a trusted colleague in the BLM giving me some good information on getting this up and running. Just got this yesterday so I haven't made any calls following up on the recommendations. This is for you and sharpening any talking points please do not share directly with the Secretary.

Dan Wenk  
Superintendent  
Yellowstone National Park  
(307) 344-2002

Begin forwarded message:

**(b)5 Draft-Deliberative**



(b)5 Draft-Deliberative





Wenk, Dan &lt;dan\_wenk@nps.gov&gt;

---

**Re: Sorry to ask...**

1 message

---

**Wenk, Dan** <dan\_wenk@nps.gov>  
To: "Mihalic, David" <david\_mihalic@ios.doi.gov>

Wed, May 16, 2018 at 4:50 PM

Dave,

attached is the beginning of a brief on this issue. The information may be good for your discussions tomorrow.

Questions please let me know.

more information tomorrow morning concerning your other questions.

On Wed, May 16, 2018 at 1:54 PM, Mihalic, David &lt;david\_mihalic@ios.doi.gov&gt; wrote:

(b)5 Draft-Deliberative



Dave

--

David A. Mihalic

Senior Advisor to the Secretary  
United States Department of the Interior  
MIB Room 6124  
1849 "C" Street NW  
Washington, D.C. 20240

Phone: 202-208-4130  
cell: 202-706-4978  
[david\\_mihalic@ios.doi.gov](mailto:david_mihalic@ios.doi.gov)

*Remember, everything I send or receive is subject to the Freedom of Information Act*

--

Dan Wenk  
Superintendent  
Yellowstone National Park

7/2/2018

DEPARTMENT OF THE INTERIOR Mail - Re: Sorry to ask...

307-344-2002

Fax: 307-344-2014

[dan\\_wenk@nps.gov](mailto:dan_wenk@nps.gov)



**BisonGrazingMgmt\_May2018.docx**

40K

- No single “stocking rate” (i.e., density) of ungulates is optimal for conserving biodiversity and ecological processes because some species of wildlife need a variety of habitats, while others favor severely disturbed or undisturbed habitats. A wide range of grazing intensities should occur across the landscape to produce a mosaic of vegetation composition and structure, with some heavily grazed areas and some nearly ungrazed areas.
- Independent evaluations sponsored by the National Academy of Sciences (2002) and the U.S. Geological Survey (2005) concluded YELL is not overgrazed and bison have not reached carrying capacity (>6,200 bison). However, migrations outside the park increase during winters with deep snowpack and more than 4,700 bison.
- A total of 4,816 bison were counted in YELL during summer 2017, including 3,969 in northern YELL and 847 in central YELL. About 1,173 bison were removed from the population this winter, primarily in northern YELL. Thus, biologists expect about 4,300 bison after calving, which will be verified with a count in late July.
- Some sites in northern YELL are intensely grazed by bison, but the locale with the highest consumption (Lamar Valley) supports large areas of rhizomatous grasses from abandoned hayfields that fare relatively well in response to repeated, intense grazing; despite low standing crop by the end of summer.
- Intensively grazed areas comprise a small portion of the available summer habitats for bison and elk in YELL. The majority of the summer range and all of the winter range has moderate to low consumption rates due to a substantial decrease in elk numbers throughout the park and fewer bison in the central region.
- The biomass and production of ungulates in YELL has remained relatively high for decades; indicating many thousands of animals are attaining adequate forage to sustain sufficient body condition for reproduction and survival. This would not occur if YELL was overgrazed and ungulates exceeded ecological carrying capacity.

**Background:**

- The Yellowstone National Park Act of 1872 dedicated land as a public park for the benefit and enjoyment of the people. Congress directed the Secretary of the Interior to “provide for the preservation ... of all timber, mineral deposits, natural curiosities, or wonders within said park, and their retention in their natural condition.”
- The desired condition for the native shrub-grass plant association in northern YELL is a sustainable community with functioning water, soil properties, energy and nutrient cycles, and disturbance dynamics (e.g., fires, floods, herbivory). Some areas of the extensive grasslands would be more heavily grazed than others.
- The desired condition for wildlife in YELL is to sustain or restore populations of native wildlife consisting of untamed, free-roaming animals that live in an environment not dominated by humans and whose behaviors, movements, survival, and reproduction are predominantly affected by their own decisions and natural selection.
- Bison are the only exception to this practice and are frequently captured near the park boundary and shipped to slaughter facilities pursuant to a court-mediated plan finalized in 2000 due to concerns about brucellosis transmission risk to cattle. Chronically infected elk populations in surrounding states are not managed similarly.
- Since numbers of migratory ungulates are allowed to vary substantially among seasons and years, quite unlike the stocking and rotation of livestock on commercial rangelands and grazing allotments, grasslands within the park should not be expected to look like nearby ranches cultivated, fertilized, and irrigated for cattle production.
- During the 1980s and 1990s, elk were abundant (11,000-19,000) and the primary grazer in northern Yellowstone. Grass consumption was relatively high (45-55% of annual above-ground production) in some areas and comparable to the consumption of grasses (60%) in the savanna systems of the African Serengeti.
- In 2002, an independent review of grazing and grasslands in northern YELL by the National Research Council cautioned “For example, some people compare the northern range unfavorably with nearby ranches, but that reflects a mixing of values. Ranching seeks high production for human uses, but YNP seeks to preserve a natural environment and the species and ecological processes within it.”
- An independent evaluation of the food-limited carrying capacity for Yellowstone bison was completed by Colorado State University and the U.S. Geological Survey in 2005. With about 5,000 elk, the model predicted a carrying capacity of more than 8,000 bison. With about 20,000 elk, the model predicted a capacity of about

6,200 bison (see <http://www.americanbisonsocietyonline.org/Portals/7/PlumbEtAl2009.pdf> for more details). Currently, there are about 8,000 northern Yellowstone elk; 80% of which winter outside YELL.

- As northern Yellowstone elk numbers decreased by 75% following predator restoration, bison numbers quadrupled in northern YELL during the 2000s and grazing became more concentrated and prolonged in certain areas (e.g., Lamar Valley) compared to the more dispersed and seasonal grazing by elk. Grass consumption by abundant bison during 2012 to 2014 was higher (49%) than when elk were the dominant grazers (31%) and exceeded 70% annually in some areas.
- Climate is a primary factor influencing grass production because variations in precipitation and temperature strongly influence soil moisture which, in turn, limits production. As a result, variations in weather among years contribute to large variations in grassland production. Also, the proliferation of nonnative plant species since 2005 has fundamentally changed the composition and production of some grassland communities in YELL.

#### **Current Status:**

- During 2012-2014, biologists performed mechanical removal experiments to test the response of grasslands to controlled, simulated grazing. Total aboveground production was maintained even when clipping intensity (i.e., removal of leave tissue) reached 80%. However, removal of more than 30% of annual production reduced standing crop available at the end of the growing season.
- Since 2012, biologists have been documenting changes in the amount of above-ground production, percent consumption by the grazing community, soil nutrient availability, soil organic matter, plant composition, bare ground, and litter at 30 sites in high-use bison areas in YELL. A summary of findings to date could be produced by December 31, 2018.
- Biologists are completing a remote sensing analysis using satellite data to classify vegetation communities based on spectral signatures, with field staff ground-truthing sites to improve mapping precision. Also, biologists are using real-time GPS data recorded from Iridium telemetry collars fit to bison to generate use surfaces/maps. Staff are visiting sites to collect standing crop estimates.
- By November 30, 2018, biologists will estimate (1) the forage capacity of habitats in YELL for bison using park-wide annual production estimates generated from remote sensing satellite data, (2) recommended stocking rates based on livestock models, and (3) current stocking rates using bison aerial counts and utilization distributions estimated from radio-collared bison.

(b)5 Draft Deliberative

- To advance the Interagency Bison Management Plan and the restoration of plains bison, there is a need to restore seasonal movements of bison across jurisdictional boundaries to conditions resembling those for other ungulates in the Yellowstone area. This restoration would contribute to the National Park Service mission of preserving wildlife and the ecological processes that sustain them for the benefit and enjoyment of people.

(b)5 Draft Deliberative

**Contact Person:** Dan Wenk, Superintendent, Yellowstone National Park, (307) 344-2002, [dan\\_wenk@nps.gov](mailto:dan_wenk@nps.gov)

**Last Updated:** May 16, 2018

**Updated By:** P. J. White, Chief, Wildlife and Aquatic Resources Branch, Yellowstone Center for Resources

5/16/2018

DEPARTMENT OF THE INTERIOR Mail - Fwd: Sorry to ask...



White, P <pj\_white@nps.gov>

## Fwd: Sorry to ask...

1 message

Dan Wenk <dan\_wenk@nps.gov>

To: jennifer\_carpenter@nps.gov, pj\_white@nps.gov, Tim Reid <tim\_reid@nps.gov>

Wed, May 16, 2018 at 3:28 PM

Dan Wenk  
Superintendent  
Yellowstone National Park  
(307) 344-2002

Begin forwarded message:

**From:** "Mihalic, David" <david\_mihalic@ios.doi.gov>  
**Date:** May 16, 2018 at 1:54:13 PM MDT  
**To:** Dan Wenk <dan\_wenk@nps.gov>  
**Subject:** Sorry to ask...

**(b)5 Draft-Deliberative**

Dave

--  
David A. Mihalic

Senior Advisor to the Secretary  
United States Department of the Interior  
MIB Room 6124  
1849 "C" Street NW  
Washington, D.C. 20240

Phone: 202-208-4130  
cell: 202-706-4978  
david\_mihalic@ios.doi.gov

5/16/2018

DEPARTMENT OF THE INTERIOR Mail - [REDACTED] Sorry to ask...

*Remember, everything I send or receive is subject to the Freedom of Information Act*



White, P <pj\_white@nps.gov>

## Briefs on Bison Grazing and Abundance

1 message

White, P <pj\_white@nps.gov>

Thu, May 17, 2018 at 6:52 AM

To: Dan Wenk <dan\_wenk@nps.gov>, "Carpenter, Jennifer" <jennifer\_carpenter@nps.gov>, Tim Reid <tim\_reid@nps.gov>, Rick Wallen <rick\_wallen@nps.gov>, Chris Geremia <chris\_geremia@nps.gov>, Pete Webster <pete\_webster@nps.gov>, Patrick Kenney <pat\_kenney@nps.gov>  
Cc: Kerrie Evans <Kerrie\_Evans@nps.gov>

attached

P. J. White  
Chief, Wildlife and Aquatic Resources  
Yellowstone National Park  
Mammoth, Wyoming 82190  
Office: 307/344-2442

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

2 attachments

 **BisonAbundanceIBMP\_May2018.docx**  
22K

 Brief\_BisonGrazingMgmt\_May2018.docx  
42K

## Briefing Statement FY 2018

**Bureau:** National Park Service  
**Issue:** Bison Abundance under the Interagency Bison Management Plan  
**Member:** State of Montana, Montana Congressional Delegation  
**Issue:** Yellowstone National Park

### Key Points:

- When the Interagency Bison Management Plan (IBMP) was negotiated (late 1990s), there was pressure to prevent cattle from being infected with brucellosis to maintain interstate movements and trade agreements without additional testing. A population target of 3,000 bison was chosen to reduce migrations outside the park to prevent brucellosis transmission. Elk were considered unlikely to mingle with cattle and transmit brucellosis.
- We now know brucellosis is sustained independently in elk populations inhabiting about 17 million acres, whereas bison inhabit about 1.5 million acres near the core. Elk commonly mingle with livestock and have transmitted brucellosis to them 27 times since 1998. No transmissions from bison to cattle have been detected.
- A 2006 adjustment to the IBMP clarified "a population of 3,000 bison is defined as a population indicator to guide implementation of risk management activities, and is not a target for deliberate population adjustment."
- During 2006-2017, spatial and temporal tolerance for more untested bison in Montana was increased several times due to fewer cattle adjacent to YELL, desire for larger public and treaty harvests, changes in APHIS regulations regarding brucellosis class-free status, recognition that bull bison are not transmission vectors, and successful management to reduce conflicts with landowners and livestock operators.
- Bison numbers were allowed to increase and averaged ~4,200 during 2001-2017 (range ~2,900-5,500).

### Background:

- 2000: The goal of the IBMP is "to maintain a wild, free ranging population of bison and address the risk of brucellosis transmission to protect the economic interest and viability of the livestock industry in Montana."
- 2002: An independent review of grazing and grasslands in northern YELL by the National Academy of Sciences concluded the park was not overgrazed and managers could continue to allow numbers of ungulates to fluctuate in response to predators, resource limitations, weather, and hunting outside the park.
- 2004-2005: The State of Montana completed environmental evaluations for a public bison hunt and hunting was included in the IBMP as a management action outside YELL.
- 2005: An independent evaluation of the food-limited carrying capacity for Yellowstone bison was completed by Colorado State University and the U.S. Geological Survey. With about 5,000 elk, the model predicted a carrying capacity of more than 8,000 bison. With about 20,000 elk, the model predicted a capacity of about 6,200 bison. Currently, there are about 8,000 northern Yellowstone elk; 80% of which winter outside YELL.
- 2006: Montana recognized the treaty rights of the Salish and Kootenai tribes and the Nez Perce tribe for harvesting bison on open and unclaimed federal lands adjacent to YELL. Treaty rights of the Shoshone-Bannock, Umatilla, Yakama, and Blackfeet tribes were recognized during 2009-2018.
- 2006: The IBMP was adjusted to increase tolerance for bull bison in Montana because there is virtually no risk of them transmitting brucellosis to cattle.
- 2008: The State of Montana signed a 30-year livestock grazing restriction and bison access agreement with the Church Universal and Triumphant, Inc. to remove livestock from the Royal Teton Ranch, located just north of the park boundary. The National Park Service provided \$1.5 million to implement the initial payment for this agreement and allow progressively increasing numbers of bison to use habitats north of the park boundary, including portions of the Royal Teton Ranch and the Custer Gallatin National Forest.
- 2009: A peer-reviewed article by YELL staff proposed maintaining a bison population that varies on a decadal scale between 2,500 and 4,500 animals to satisfy the collective long-term interests of stakeholders, as a balance between the park's forage base, conservation of the genetic integrity of the bison population, protection of their migratory tendencies, brucellosis risk management, and other societal constraints.
- 2010: APHIS promulgated a regulatory rule that greatly reduced the risk of Montana losing its brucellosis-free status and experiencing associated economic costs by dealing with outbreaks in cattle on a case-by-case basis and eliminating the need to remove exposed herds and test across the entire state.
- 2011-2012: Several adjustments were made to the IBMP to substantially increase spatial and temporal tolerance for bison migrating north and west of YELL during winter.

- 2015: The Governor of Montana approved a greater distribution of wild bison on some lands near YELL, including year-round in some areas, which he concluded would not increase the risk of brucellosis transmission to cattle.
- 2016: An independent analysis of genetic data determined all cattle herds infected with brucellosis in the Greater Yellowstone Area were from elk, not bison. There were five distinct strains of *Brucella abortus* bacteria, four of which were associated with elk and originated from the feed grounds in Wyoming. Brucellosis was self-sustaining in elk and spreading at an increased rate in populations outside of the feed grounds. As a result, control measures in bison likely would not affect the dynamics of unrelated strains in elk populations.
- 2016: At meetings with the State of Montana regarding alternatives for a new Environmental Impact Statement (EIS) regarding bison management, there was agreement in principle to average 4,200 bison (summer count) over 5-year moving windows.
- 2017: The National Academies of Sciences, Engineering, and Medicine issued a report revisiting brucellosis in the Greater Yellowstone Area and concluded there was clear evidence that brucellosis transmission to livestock has come from infected elk and, as a result, aggressive control measures in bison seem unwarranted until tools become available that would simultaneously allow for an eradication program in elk.

**Current Status:**

- A total of 4,816 bison were counted in YELL during summer 2017, including 3,969 in northern YELL and 847 in central YELL. About 1,173 bison were removed from the population this winter, primarily in northern YELL. Thus, biologists expect about 4,300 bison after calving, which will be verified with a count in late July.
- Under the IBMP, there has been no detected transmission of brucellosis from wild bison to cattle, while a viable, wild population of bison has been sustained in YELL.
- Preparation of a new EIS for the IBMP has stagnated in recent years due, in part, to a lack of commitment, funding, and staff participation from the State of Montana and some cooperators. The Superintendent of YELL intends to reinstate discussions regarding whether this effort should be rekindled.

**Contact Person:** Dan Wenk, Superintendent, Yellowstone National Park, (307) 344-2002, dan\_wenk@nps.gov

**Last Updated:** May 17, 2018

**Updated By:** P. J. White, Chief, Wildlife and Aquatic Resources Branch, Yellowstone Center for Resources

## Briefing Statement FY 2018

**Bureau:** National Park Service  
**Issue:** Bison Abundance under the Interagency Bison Management Plan  
**Member:** State of Montana, Montana Congressional Delegation  
**Issue:** Yellowstone National Park

### Key Points:

(b)5 Draft Deliberative



### Background:

- 2000: The goal of the IBMP is “to maintain a wild, free ranging population of bison and address the risk of brucellosis transmission to protect the economic interest and viability of the livestock industry in Montana.”
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- 2004-2005: The State of Montana completed environmental evaluations for a public bison hunt and hunting was included in the IBMP as a management action outside YELL.
- 2005: An independent evaluation of the food-limited carrying capacity for Yellowstone bison was completed by Colorado State University and the U.S. Geological Survey. With about 5,000 elk, the model predicted a carrying capacity of more than 8,000 bison. With about 20,000 elk, the model predicted a capacity of about 6,200 bison. Currently, there are about 8,000 northern Yellowstone elk; 80% of which winter outside YELL.
- 2006: Montana recognized the treaty rights of the Salish and Kootenai tribes and the Nez Perce tribe for harvesting bison on open and unclaimed federal lands adjacent to YELL. Treaty rights of the Shoshone-Bannock, Umatilla, Yakama, and Blackfoot tribes were recognized during 2009-2018.
- 2006: The IBMP was adjusted to increase tolerance for bull bison in Montana because there is virtually no risk of them transmitting brucellosis to cattle.
- 2008: The State of Montana signed a 30-year livestock grazing restriction and bison access agreement with the Church Universal and Triumphant, Inc. to remove livestock from the Royal Teton Ranch, located just north of the park boundary. The National Park Service provided \$1.5 million to implement the initial payment for this agreement and allow progressively increasing numbers of bison to use habitats north of the park boundary, including portions of the Royal Teton Ranch and the Custer Gallatin National Forest.
- 2009: A peer-reviewed article by YELL staff proposed maintaining a bison population that varies on a decadal scale between 2,500 and 4,500 animals to satisfy the collective long-term interests of stakeholders, as a balance

between the park's forage base, conservation of the genetic integrity of the bison population, protection of their migratory tendencies, brucellosis risk management, and other societal constraints.

- 2010: APHIS promulgated a regulatory rule that greatly reduced the risk of Montana losing its brucellosis-free status and experiencing associated economic costs by dealing with outbreaks in cattle on a case-by-case basis and eliminating the need to remove exposed herds and test across the entire state.
- 2011-2012: Several adjustments were made to the IBMP to substantially increase spatial and temporal tolerance for bison migrating north and west of YELL during winter.
- 2015: The Governor of Montana approved a greater distribution of wild bison on some lands near YELL, including year-round in some areas, which he concluded would not increase the risk of brucellosis transmission to cattle.
- 2016: An independent analysis of genetic data determined all cattle herds infected with brucellosis in the Greater Yellowstone Area were from elk, not bison. There were five distinct strains of *Brucella abortus* bacteria, four of which were associated with elk and originated from the feed grounds in Wyoming. Brucellosis was self-sustaining in elk and spreading at an increased rate in populations outside of the feed grounds. As a result, control measures in bison likely would not affect the dynamics of unrelated strains in elk populations.
- 2016: At meetings with the State of Montana regarding alternatives for a new Environmental Impact Statement (EIS) regarding bison management, there was agreement in principle to average 4,200 bison (summer count) over 5-year moving windows.
- 2017: The National Academies of Sciences, Engineering, and Medicine issued a report revisiting brucellosis in the Greater Yellowstone Area and concluded there was clear evidence that brucellosis transmission to livestock has come from infected elk and, as a result, aggressive control measures in bison seem unwarranted until tools become available that would simultaneously allow for an eradication program in elk.

**Current Status:**

- A total of 4,816 bison were counted in YELL during summer 2017, including 3,969 in northern YELL and 847 in central YELL. About 1,173 bison were removed from the population this winter, primarily in northern YELL. Thus, biologists expect about 4,300 bison after calving, which will be verified with a count in late July.
- Under the IBMP, there has been no detected transmission of brucellosis from wild bison to cattle, while a viable, wild population of bison has been sustained in YELL.

(b)5 Draft Deliberative

**Contact Person:** Dan Wenk, Superintendent, Yellowstone National Park, (307) 344-2002, dan\_wenk@nps.gov

**Last Updated:** May 17, 2018

**Updated By:** P. J. White, Chief, Wildlife and Aquatic Resources Branch, Yellowstone Center for Resources

## Briefing Statement FY 2018

Bureau: National Park Service  
Issue: (b)5 Draft-Deliberative  
Member: State of Montana, Montana Congressional Delegation  
Issue: Yellowstone National Park

### Key Points:

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- No single "stocking rate" (i.e., density) of ungulates is optimal for conserving biodiversity and ecological processes because some species of wildlife need a variety of habitats, while others favor severely disturbed or undisturbed habitats. A wide range of grazing intensities should occur across the landscape to produce a mosaic of vegetation composition and structure, with some heavily grazed areas and some nearly ungrazed areas.
- Independent evaluations sponsored by the National Academy of Sciences (2002) and the U.S. Geological Survey (2005) concluded YELL is not overgrazed and bison have not reached carrying capacity (>6,200 bison). However, migrations outside the park increase during winters with deep snowpack and more than 4,700 bison.
- A total of 4,816 bison were counted in YELL during summer 2017, including 3,969 in northern YELL and 847 in central YELL. About 1,173 bison were removed from the population this winter, primarily in northern YELL. Thus, biologists expect about 4,300 bison after calving, which will be verified with a count in late July.
- Some sites in northern YELL are intensely grazed by bison, but the locale with the highest consumption (Lamar Valley) supports large areas of rhizomatous grasses from abandoned hayfields that fare relatively well in response to repeated, intense grazing; despite low standing crop by the end of summer.
- Intensively grazed areas comprise a small portion of the available summer habitats for bison and elk in YELL. The majority of the summer range and all of the winter range has moderate to low consumption rates due to a substantial decrease in elk numbers throughout the park and fewer bison in the central region.
- The biomass and production of ungulates in YELL has remained relatively high for decades; indicating many thousands of animals are attaining adequate forage to sustain sufficient body condition for reproduction and survival. This would not occur if YELL was overgrazed and ungulates exceeded ecological carrying capacity.

### Background:

- The Yellowstone National Park Act of 1872 dedicated land as a public park for the benefit and enjoyment of the people. Congress directed the Secretary of the Interior to "provide for the preservation ... of all timber, mineral deposits, natural curiosities, or wonders within said park, and their retention in their natural condition."
- The desired condition for the native shrub-grass plant association in northern YELL is a sustainable community with functioning water, soil properties, energy and nutrient cycles, and disturbance dynamics (e.g., fires, floods, herbivory). Some areas of the extensive grasslands would be more heavily grazed than others.
- The desired condition for wildlife in YELL is to sustain or restore populations of native wildlife consisting of untamed, free-roaming animals that live in an environment not dominated by humans and whose behaviors, movements, survival, and reproduction are predominantly affected by their own decisions and natural selection.
- Bison are the only exception to this practice and are frequently captured near the park boundary and shipped to slaughter facilities pursuant to a court-mediated plan finalized in 2000 due to concerns about brucellosis transmission risk to cattle. Chronically infected elk populations in surrounding states are not managed similarly.
- Since numbers of migratory ungulates are allowed to vary substantially among seasons and years, quite unlike the stocking and rotation of livestock on commercial rangelands and grazing allotments, grasslands within the park should not be expected to look like nearby ranches cultivated, fertilized, and irrigated for cattle production.
- During the 1980s and 1990s, elk were abundant (11,000-19,000) and the primary grazer in northern Yellowstone. Grass consumption was relatively high (45-55% of annual above-ground production) in some areas and comparable to the consumption of grasses (60%) in the savanna systems of the African Serengeti.

- In 2002, an independent review of grazing and grasslands in northern YELL by the National Research Council cautioned "For example, some people compare the northern range unfavorably with nearby ranches, but that reflects a mixing of values. Ranching seeks high production for human uses, but YNP seeks to preserve a natural environment and the species and ecological processes within it."
- An independent evaluation of the food-limited carrying capacity for Yellowstone bison was completed by Colorado State University and the U.S. Geological Survey in 2005. With about 5,000 elk, the model predicted a carrying capacity of more than 8,000 bison. With about 20,000 elk, the model predicted a capacity of about 6,200 bison (see <http://www.americanbisonsocietyonline.org/Portals/7/PlumbEtAl2009.pdf> for more details). Currently, there are about 8,000 northern Yellowstone elk; 80% of which winter outside YELL.
- As northern Yellowstone elk numbers decreased by 75% following predator restoration, bison numbers quadrupled in northern YELL during the 2000s and grazing became more concentrated and prolonged in certain areas (e.g., Lamar Valley) compared to the more dispersed and seasonal grazing by elk. Grass consumption by abundant bison during 2012 to 2014 was higher (49%) than when elk were the dominant grazers (31%) and exceeded 70% annually in some areas.
- Climate is a primary factor influencing grass production because variations in precipitation and temperature strongly influence soil moisture which, in turn, limits production. As a result, variations in weather among years contribute to large variations in grassland production. Also, the proliferation of nonnative plant species since 2005 has fundamentally changed the composition and production of some grassland communities in YELL.

#### Current Status:

- During 2012-2014, biologists performed mechanical removal experiments to test the response of grasslands to controlled, simulated grazing. Total aboveground production was maintained even when clipping intensity (i.e., removal of leave tissue) reached 80%. However, removal of more than 30% of annual production reduced standing crop available at the end of the growing season.
- Since 2012, biologists have been documenting changes in the amount of above-ground production, percent consumption by the grazing community, soil nutrient availability, soil organic matter, plant composition, bare ground, and litter at 30 sites in high-use bison areas in YELL. A summary of findings to date could be produced by December 31, 2018.
- Biologists are completing a remote sensing analysis using satellite data to classify vegetation communities based on spectral signatures, with field staff ground-truthing sites to improve mapping precision. Also, biologists are using real-time GPS data recorded from Iridium telemetry collars fit to bison to generate use surfaces/maps. Staff are visiting sites to collect standing crop estimates.
- By November 30, 2018, biologists will estimate (1) the forage capacity of habitats in YELL for bison using park-wide annual production estimates generated from remote sensing satellite data, (2) recommended stocking rates based on livestock models, and (3) current stocking rates using bison aerial counts and utilization distributions estimated from radio-collared bison.

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- To advance the Interagency Bison Management Plan and the restoration of plains bison, there is a need to restore seasonal movements of bison across jurisdictional boundaries to conditions resembling those for other ungulates in the Yellowstone area. This restoration would contribute to the National Park Service mission of preserving wildlife and the ecological processes that sustain them for the benefit and enjoyment of people.

(b)5 Draft Deliberative

**Contact Person:** Dan Wenk, Superintendent, Yellowstone National Park, (307) 344-2002, [dan\\_wenk@nps.gov](mailto:dan_wenk@nps.gov)  
**Last Updated:** May 16, 2018  
**Updated By:** P. J. White, Chief, Wildlife and Aquatic Resources Branch, Yellowstone Center for Resources

**From:** [Dan Wenk](#)  
**To:** [Mihalic, David](#)  
**Subject:** Re: Sorry to ask...  
**Date:** Thursday, May 17, 2018 7:09:07 AM

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Dave,

That was not ready for prime time and therefore not set up as a brief. I was just giving you information informally. We will adjust for all the things you are concerned about before we would submit (b)5 Draft-Deliberative

Did you see the brief I just sent?

And there is no second brief or no 1 of 2.

We can talk at about 8:45 your time.

Dan Wenk  
Superintendent  
Yellowstone National Park  
(307) 344-2002

On May 17, 2018, at 7:03 AM, Mihalic, David <[david\\_mihalic@ios.doi.gov](mailto:david_mihalic@ios.doi.gov)> wrote:

Dan,

(b)5 Draft-Deliberative

(b)5 Draft-Deliberative

When can we talk?

Dave

On Wed, May 16, 2018 at 6:50 PM, Wenk, Dan <[dan\\_wenk@nps.gov](mailto:dan_wenk@nps.gov)> wrote:

Dave,

attached is the beginning of a brief on this issue. The information may be good for your discussions tomorrow.

Questions please let me know.

more information tomorrow morning concerning your other questions.

On Wed, May 16, 2018 at 1:54 PM, Mihalic, David

<[david\\_mihalic@ios.doi.gov](mailto:david_mihalic@ios.doi.gov)> wrote:

(b)5 Draft-Deliberative

Dave

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David A. Mihalic

Senior Advisor to the Secretary  
United States Department of the Interior

MIB Room 6124  
[1849 "C" Street NW](#)  
[Washington, D.C. 20240](#)

Phone: 202-208-4130  
cell: 202-706-4978  
[david\\_mihalic@ios.doi.gov](mailto:david_mihalic@ios.doi.gov)

*Remember, everything I send or receive is subject to the Freedom of Information Act*

--

Dan Wenk  
Superintendent  
Yellowstone National Park  
307-344-2002  
Fax: 307-344-2014  
[dan\\_wenk@nps.gov](mailto:dan_wenk@nps.gov)

--

David A. Mihalic

Senior Advisor to the Secretary  
United States Department of the Interior  
MIB Room 6124  
1849 "C" Street NW  
Washington, D.C. 20240

Phone: 202-208-4130  
cell: 202-706-4978  
[david\\_mihalic@ios.doi.gov](mailto:david_mihalic@ios.doi.gov)

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**From:** [Mihalic, David](#)  
**To:** [Dan Wenk](#)  
**Subject:** Re: Sorry to ask...  
**Date:** Thursday, May 17, 2018 7:24:21 AM

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Got it - after 8 am your time - and - I don't think that brief is needed (or helpful) at this time. Let's see how this shakes out - (b)5 Draft-Deliberative

(b)5 Draft-Deliberative

D

On Thu, May 17, 2018 at 9:19 AM, Dan Wenk <[dan\\_wenk@nps.gov](mailto:dan_wenk@nps.gov)> wrote:

Anytime between 10:00 - 11:00 your time, call me.

Dan Wenk  
Superintendent  
Yellowstone National Park  
(307) 344-2002

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Dave

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(b)5 Draft-Deliberative

Dave

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David A. Mihalic

Senior Advisor to the Secretary  
United States Department of the Interior  
MIB Room 6124  
[1849 "C" Street NW](#)

[Washington, D.C. 20240](#)

Phone: 202-208-4130

cell: 202-706-4978

[david\\_mihalic@ios.doi.gov](mailto:david_mihalic@ios.doi.gov)

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Dan Wenk  
Superintendent  
Yellowstone National Park  
307-344-2002  
Fax: 307-344-2014  
[dan\\_wenk@nps.gov](mailto:dan_wenk@nps.gov)

--

David A. Mihalic

Senior Advisor to the Secretary  
United States Department of the Interior  
MIB Room 6124  
1849 "C" Street NW  
Washington, D.C. 20240

Phone: 202-208-4130

cell: 202-706-4978

[david\\_mihalic@ios.doi.gov](mailto:david_mihalic@ios.doi.gov)

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David A. Mihalic

Senior Advisor to the Secretary  
United States Department of the Interior  
MIB Room 6124  
1849 "C" Street NW  
Washington, D.C. 20240

Phone: 202-208-4130

cell: 202-706-4978

[david\\_mihalic@ios.doi.gov](mailto:david_mihalic@ios.doi.gov)

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