

United States Department of the Interior

NATIONAL PARK SERVICE PO Box 168 Yellowstone National Park Wyoming 82190

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Ms. Summer Nelson Montana Legal Counsel Western Watersheds Project P.O. Box 7681 Missoula, Montana 59807

Dear Ms. Nelson:

Thank you for your October 30, 2008, letter suggesting an Environmental Impact Statement (EIS) for the proposed action by Montana Fish, Wildlife, and Parks (MFWP) regarding a Royal Teton Ranch (RTR) grazing restriction and bison access agreement.

The final federal EIS of 2000 and respective federal and state Records of Decision (ROD) for the Interagency Bison Management Plan (IBMP) identified that the modified preferred alternative would remain in effect for at least fifteen years, but did not establish a "sunset" date for the plan. Substantive adaptive management adjustments to the IBMP, including increased long-term tolerance for bison outside the park, were anticipated when cattle no longer graze on the RTR. Costs shared among the IBMP partners and totaling less than \$29.1 million were anticipated under the IBMP for land acquisitions, easements, and conversions of livestock operations to create conflict-free habitat for bison (page 195, FEIS). Impacts associated with these factors (such as viewing, cultural significance of the herd, impacts to grizzly bears, livestock operations, etc.) were disclosed for various alternatives considered in the final federal EIS for the IBMP. Montana is also conducting an Environmental Assessment for the proposed state action.

A RTR grazing restriction and bison access agreement has been proposed by Montana as the mechanism for implementing the cessation of livestock grazing on RTR lands, improved brucellosis risk management, and increased tolerance of free ranging bison on lands adjacent to the park. The proposed, one-time funding of \$1.5 million from the NPS to MFWP to support implementation of these adaptive management adjustments to the IBMP is contingent upon MFWP having, under the IBMP, jointly signed with the Church Universal and Triumphant, Inc. (i.e., RTR) a grazing restriction and bison access agreement for the ranch. To this effect, the NPS anticipates renewing a cooperative agreement with Montana in five-year increments for up to thirty years.

Please be assured that the National Park Service will continue to cooperatively advance the long-term conservation of a free-ranging population of wild bison. I appreciate your dedication to the conservation of wildlife resources in the greater Yellowstone area, and look forward to continuing productive relationships with the many stakeholders who have an interest in this very important issue.

Sincerely,

Suzanne Lewis

Superintendent