

September 16, 2026

Cam Sholly, Superintendent
Yellowstone National Park
PO Box 168
Yellowstone National Park, WY 82190-0168

Matt Jedra, Forest Supervisor
Custer Gallatin National Forest
P.O. Box 130
Bozeman, MT 59715

Kelly Moore, Administrator
U.S. Department of Agriculture
Animal and Plant Health Inspection Service
George Washington Carver Center
5601 Sunnyside Ave.
Beltsville, MD 20705

Dear Superintendent Sholly, Forest Supervisor Jedra, and Administrator Moore,

The Interagency Bison Management Planning committee (IBMP) is violating its own protocols in its recent meetings. It is undermining meaningful public participation, sidelining the public, and otherwise designing its process to avoid public criticism. The People deserve a fair process, and they trust you to ensure that. They deserve better than these IBMP meetings that are implementing practices procedures—different than the ones to which the organizations agreed in their protocols—to avoid public accountability.

Yellowstone Voices organized as a 501(c)(3) nonprofit charity to preserve, to protect, and to appreciate the wildlife, natural, and environmental resources in and around Yellowstone National Park, and to support access to and information about Yellowstone.

Gallatin Wildlife Association is a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. As a nonprofit 501 (c)(3) organization founded in 1976, Gallatin Wildlife Association recognizes the intense pressures on our wildlife from habitat loss and climate change, and it advocates for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

Roam Free Nation seeks to inspire responsibility and action for the Earth by highlighting the last wild, migratory buffalo of Yellowstone Country, to serve their perspective, and to work to end their killing so they may recover, and naturally restore themselves on the lands that are their birthright. We aid our allies who are working in defense of all Others, including prairie dogs, grizzly bears, wolves, land, water, and Indigenous justice.

The IBMP has been routinely and flagrantly violating its own protocols, and it has designed every violation to reduce meaningful public participation. These actions are arbitrary and capricious and violate the Agencies' due process obligations to the citizens of the United States—especially those who live near Yellowstone and whose lives and livelihoods suffer most from your horrible Yellowstone wild bison management.

First, the IBMP failed to post the May 14, 2026, meeting agenda on the website two weeks before the meeting. Page 4 of the 2024 Partner Protocols require that notice. Yet the IBMP held the meeting anyway. The public cannot meaningfully know whether to participate if the IBMP posts that notice only days before the meeting—instead of providing the notice the Agencies promised. If the Agencies fail to issue notice on time, due process requires rescheduling the meeting until the Agencies can provide reasonable notice. *See League of Cal. Cities v. FCC*, 118 F.4th 995, 1030 (9th Cir. 2024) (overturning the FCC for failing to follow the APA's notice requirements, but instead “follow[ing] its own proceedings on a much-truncated timeline.”).

Second, the IBMP is failing to provide actual notice to the people who have a liberty or property interest, and for whom the Agencies have their email addresses. The Due Process Clause requires *actual notice* to people affected by government action when the agency has their contact information. Merely posting notice on the internet does not satisfy that requirement. *See Tulsa Pro. Collection Servs., Inc. v. Pope*, 485 U.S. 478, 485 (1988). Providing email notice of IBMP meetings is a low-cost method of providing actual notice, and the Agencies can use it to notify people they know will be affected. *See Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 319 (1950). By failing to provide actual notice, the IBMP is violating the Due Process Clause. It owes email notice to Yellowstone Voices, Gallatin Wildlife Association, Roam Free Nation, and all other IBMP public attendees who have ever attended.

Third, the May 14, 2026, recording violated the Partner Protocols' requirement to record the entire meeting. That requirement is so important that the Protocols state it twice. First, “All IBMP Partner Meetings are open to the public and are recorded.” Partner Protocols 4. Then, “Spring and Fall IBMP Partner Meetings will be recorded.” *Id.* at 5. Yet the May 14 recording only recorded the public comments.¹ The IBMP's failure to follow the plain text of its own protocols shows its arbitrary and capricious actions. “It is rudimentary administrative law that discretion as to the substance of the ultimate decision does not confer discretion to ignore the required procedures of decisionmaking.” *Bennett v. Spear*, 520 U.S. 154, 172 (1997). Going forward, we request you record and post the whole meetings on the website—not just parts of them months later. Posting them on the website within a week or two would be reasonable. Any longer just keeps that information from the public for no reason.

Fourth, you are violating the Due Process Clause by providing the public comment opportunity *before* explaining the winter operation plan. The May 14, 2026, recording excerpt revealed that the Agencies' winter operations discussion would happen *after* the public comment period. That order prevents the public from commenting on the Agencies' winter

¹ At <https://tinyurl.com/zza6yp98>.

operation plan. The Due Process clause requires “notice and an opportunity to be heard” before the government acts. *United States v. James Daniel Good Real Prop.*, 510 U.S. 43, 48 (1993). Your attempts to avoid public criticism of the winter operation plan violate the IBMP public participants’ due process rights to notice and an opportunity to be heard. The Due Process Clause requires you to allow public comment *after* the Agencies’ explanation, so the people can comment on the Agencies’ proposed course.

Fifth, the website obscures documents from public review by creating a haphazard and illogical organization that is more effective at hiding than disclosing information. The website would better serve the public by providing the documents in a single folder library organized by date. For one example, the Forest Service hid its secret August 2024 letter by putting it in some random folder on the website. That does not qualify as public notice. Generally, the Agencies have failed to design this website to provide any meaningful public notice of any of the information in it.

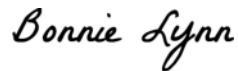
Sixth, Yellowstone Voices, Roam Free Nation, and Gallatin Wildlife Association hereby request the Agencies to resume video-conferencing access to the IBMP meetings. Montana is a big state, and travel can be treacherous. The notice failures only make those distances harder to travel, so the public can speak at your meetings. Video-conferencing access is practicable, as you showed by using Zoom meetings during the pandemic. Discontinuing that opportunity for remote public participation only underscores the Agencies’ determinations to sideline the public, to avoid public response, and to reach predetermined decisions on Yellowstone wild bison management.

In sum, Yellowstone Voices, Roam Free Nation, and Gallatin Wildlife Association hereby request you, the National Park Service, the Forest Service, and the Animal and Plant Health Inspection Service to meet these obligations and commitments:

1. Provide the notice of IBMP meetings to which you committed, or reschedule the meetings.
2. Provide actual, email notice of IBMP meetings to people who have participated in past IBMP meetings.
3. Record the entirety of every IBMP meeting, as you committed, and make them available on the website reasonably quickly.
4. Provide the public comment opportunity after explaining what you plan to do.
5. Reorganize the website to provide better availability to Agency documents.
6. Provide remote video conferencing opportunities for IBMP meetings, as you have done in the past.

Please inform us whether you will meet your commitments in your Partner Protocols and your other obligations to the People of the United States. If we can clarify any, please let us know, and we can set up a meeting.

Sincerely,



Bonnie Lynn
Executive Director
Yellowstone Voices

Date: 09 / 15 / 2026



Clint Nagel
President
Gallatin Wildlife Association

Date: 09 / 14 / 2026



Stephany Seay
President
Roam Free Nation

Date: 09 / 15 / 2026