March 5, 2018

Custer-Gallatin NF Revision Team
10 East Babcock, P.O. Box 130
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Sent via email to: cgplanrevision@fs.fed.us

Dear Planning Team:

Please accept the following supplemental comments for the Custer-Gallatin National Forest Plan revision process on behalf of Montana Ecosystem Defense Council, Inc.

**Species of Conservation Concern**

The Wild Rockies bioregion, which included the Custer-Gallatin NF, is home to many species that have been displaced from important, prime habitat. Habitat loss is the most likely cause of species extinction. National Forests have ultimate responsibility for managing wildlife habitat that sustains threatened and endangered species that have no place else to go.  When selecting and managing for habitat that will sustain Species of Conservation Concern, priority must be given to habitat, not commercial uses.

Wild buffalo (bison) deserve special recognition and the highest priority when selecting habitat for Species of Conservation Concern. The revised Forest Plan claims falsely that it provides habitat for bison on public lands.  If habitat is not secure, it is of no use to bison.

In the context of (secure) wildlife habitat, secure means:

1)  free from danger;

2) free from risk of loss

3) affording safety

4) a *secure* hideaway

5) [trustworthy](https://www.merriam-webster.com/dictionary/trustworthy), [dependable](https://www.merriam-webster.com/dictionary/dependable)

- Miriam-Webster

Forest Plan Goal #1: Manage buffalo habitat in the public interest for public benefit, in an all-out effort to reintroduce wild bison on secure habitat. Buffalo will show agency managers where the preferred habitat is located. Buffalo, like all wildlife species need adequate, well-distributed, secure habitat to exist. No habitat, no buffalo, it’s that simple.

Buffalo need lots of room to roam.

Forest Plan Objective #1: Historic range should be mapped, and secured, including migration corridors and preferred calving areas. Wherever ancient instincts lead buffalo is where the Custer-Gallatin NF should focus their attention, and action. If there is no specific plan to improve buffalo’s need for food and secure calving outside Yellowstone National Park, there will be no positive action on behalf of free-roaming buffalo.

Recommendation #1: We request a thorough scientific review by the National Academy of Sciences. Results should guide policies and management of our public trust resources, on behalf of this generation and future generations. Trust in the knowledge and ethical principles of peer-reviewed science.

Stop kowtowing to adjacent, private and corporate landowners. Stop using irrelevant complaining by livestock and dude ranch industries as excuse for inaction.

There is no longer a legitimate (biological) claim that buffalo can transmit brucellosis to livestock. Brucella is the genus of bacteria. There are 9 species of Brucella. Brucella abortus (B. abortus) is a species of Brucella that prefer certain bovines and cervids hosts, such as domestic cattle, bison, buffalo, elk and sometimes deer and moose.

Brucella abortus may cause an animal to abort their firstborn. The science being produced today reports that the transmission risk from wild YNP bison to cattle is 0.0-0.3%, elk representing 99.7%-100% of the risk.

No documented case of wild bison to cattle transmission has ever occurred in the wild.

The genetics show that the Brucella abortus of wild bison differs from that of elk and cattle, which is almost identical, which affects species transmission.

"Our results indicate that elk and cattle isolates are virtually identical genetically, differing by only one to two mutational steps. On the contrary, bison B. abortus differed from cattle and elk by 12-20 mutational steps."- DNA Genotyping Suggests that Recent Brucellosis Outbreaks in the Greater Yellowstone Area Originated from Elk, 2009. Molecular Epidemiology of Brucella abortus Isolates from Cattle, Elk, and Bison in the United States, 1998 to 2011, 2012.

Mutations in the buffalo Brucella make if genetically impossible for infection through buffalo. The risk is effectively 0%. This is the most up-to-date science, which, if applied to the policy being considered in Plan revision, gives the USFS-USDA no legitimate cause to discriminate against buffalo on the false basis of brucellosis transmission.

Of the 99.7%-100% of the risk that elk pose, that risk is 0.00024% chance that any one Montana cattle will become infected from elk. Percentages that can be reduced by recommended mitigation methods such as later cattle turn out dates on public lands, running only spade heifers and steers on public lands, transmission risk methods of stack fencing, etc. Not all cases of brucellosis infections in cattle, since 2008, in the GYA states have been from elk, some have been cattle vaccine blooms and cattle infections.

Science, not politics should be managing our wildlife. Let buffalo roam.

Thank you for the opportunity to submit these additional comments.

Sincerely,

Steve Kelly, Co-Director, MEDC, and for,

Michael Garrity, Exec. Dir.

Alliance for the Wild Rockies

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