

## Interested Person Request

I would like to participate as an interested person in the objection resolution discussions for one or more of the identified objection issues for the Custer Gallatin National Forest 2020 Land Management Plan or the regional forester's list of species of conservation concern (SCC).

**Name:** Kelsie Dougherty, National Parks Conservation Association (NPCA)

**Address:** 321 E. Main St. Ste. 424 Bozeman, MT 59715

**Phone # or email:** kdougherty@npca.org

**Name of lead interested person (if more than one):** Kelsie Dougherty (lead), Dan Bailey,  
Stephanie Adams, Betsy Buffington

**I am interested in participating in any resolution discussions between the objector(s) and the reviewing official for the following objection issues:**

Land management plan direction and use of best available science for:

- Wildlife, including bison habitat and management, connectivity, recovery, and conservation of species and habitat (including but not limited to grizzly bear, lynx, wolverine, whitebark pine, westslope and Yellowstone cutthroat trout), identification of species of conservation concern.
- Timber production and/or harvest: identification of suitable areas, fire and fuels management, impacts of timber projects on wildlife habitat and lands adjacent to Yellowstone National Park.
- Developed sites and recreation: managing for population growth, increased recreation pressure, and human-wildlife conflict.
- Yellowstone bison

**Please provide a brief explanation of your interest in the objection(s) and any specific concern(s), including a description of your support or opposition to the objection(s):**

Since 1919, NPCA has served as America's leading voice for the National Park System, with a mission to protect and enhance America's national parks for present and future generations. NPCA has a long history of advocating for the protection of national parks and park resources, both inside park boundaries and on adjacent lands by working to connect our national parks with surrounding landscapes and maintaining habitat connectivity that is important for wide ranging wildlife species. Throughout the planning process NPCA submitted substantive comment and now requests 'Interested Person' status for objection resolution discussions pertaining to our comments.

The National Parks Conservation Association (NPCA) has actively engaged in recommendations for bison management on the Custer Gallatin National Forest (CGNF). Our organization submitted written comments alongside Defenders of Wildlife and the Greater Yellowstone Coalition. On March 21, 2018, a joint letter was submitted to Regional Forester Leanne Marten and Regional Supervisor Mary Erickson indicating our desire to see bison listed as a Species of Conservation Concern (SCC). In our letter we provided clear scientific reasoning as to why our organizations feel that bison should be listed as an SCC on the Custer Gallatin National Forest. Bison as a SCC would afford the proper protections needed for long term viability of the species as well as toward

overall restoration of Plains bison across the West, with Yellowstone bison as a vital resource. We explained the numbers and historic bison range, to satisfy the species' occurrence in the planning area, and provided evidence as to why there is substantial concern about its capability to persist over the long term; both requirements for an SCC decision. After reviewing the final EIS we do not believe that the CGNF provides bison the same management tools as it would be afforded if a SCC listing were implemented. To address these concerns NPCA fully supports the recommendations and objections provided to you by our conservation partners (Defenders of Wildlife and the Greater Yellowstone Coalition). Specifically, we ask that the Forest Service redraft the actions within the plan components for Alternative F, the preferred alternative, to delineate the CGNF's role and responsibilities toward ensuring the long-term persistence of bison on the Custer Gallatin.

NPCA has significant interest in any potential modifications to the Custer Gallatin Forest plan that may affect bison conservation and management we, therefore, would like to be included as an interested person on the following objections for the reasons stated below.

NPCA supports the following objections specifically related to bison management:

**Defenders of Wildlife**- Peter Nelson (Director, Federal Lands) Objection Dated: September 8, 2020  
**Greater Yellowstone Coalition**- Darcie Warden (Montana Conservation Coordinator) Objection Dated: September 4, 2020

**Statement of Issues:**

NPCA recommends Defenders of Wildlife and the Greater Yellowstone Coalitions objection:

- Alternative F does not go far enough in properly identifying the CGNF's role in bison management on the Custer Gallatin nor does the EIS include language in the plan components that detail such "proactive actions" for managing bison on the Custer Gallatin.

NPCA recommends Defenders of Wildlife and the Greater Yellowstone Coalitions objection:

- Language has been added to the Desired Condition FW-DC-WLBI-04 in the revised plan that weakens plan direction.

NPCA recommends Defenders of Wildlife and the Greater Yellowstone Coalitions objection:

- The single bison objective (FW-OBJ-WLBI-01) is vague, unclear, and lacks explicit direction facilitating bison expansion into/throughout suitable habitat areas within existing tolerance zones.

NPCA recommends Defenders of Wildlife and the Greater Yellowstone Coalitions objection:

- New and existing language in Guideline FW-GDL-WLBI-03 is confusing and inappropriate.

NPCA recommends Defenders of Wildlife and the Greater Yellowstone Coalitions objection:

- The Monitoring question and implementation indicators are too vague and wholly inadequate to effectively measure progress toward achieving desired conditions and goals and in serving as a trigger driving review and adaptation of management policies.

NPCA opposes the following objections specifically related to bison management:

**Sweet Grass County Commission**- Bill Wallace (Chairman), James V. Moody (County Commissioner) and Melanie Roe (County Commissioner) Objection Dated: September 8, 2020

The CGNF's role to provide and improve suitable habitat for bison to access and utilize would be impacted by the SGCC objection. NPCA strongly advocates for the distribution of bison across the CGNF landscape.

**Statement of Issues:**

NPCA opposes the Sweet Grass County Commission (SGCC) objection:

- SGCC object to the CGNF plan's expansion of bison into areas that conflict with the Designated Surveillance Area for brucellosis.

**Please identify when you commented during the planning process (scoping, draft EIS, and/or final EIS):**

NPCA has submitted substantive comments throughout the Custer Gallatin Forest planning process (Assessment/scoping, draft EIS/Plan revision, final EIS/Proposed action).

**Signature:** *Kelsie Dougherty*

**Send written letters requesting recognition as an interested party to:** USDA Forest Service, Objection Reviewing Officer, Northern Region, 26 Fort Missoula Road, Missoula, MT 59804.

Office hours are Monday through Friday, 8:00 a.m. to 4:30 p.m., excluding Federal holidays. Given current health and safety guidelines an appointment must be made in advance to the office you wish to drop your hardcopy at.

**Send an electronic submission requesting recognition as an interested party to:** <https://cara.ecosystem-management.org/Public/CommentInput?Project=50185> Electronic submissions must be submitted in a format that is readable with optical character recognition software (e.g., Word, PDF, Rich Text) and must be searchable. An automated response will confirm that your electronic objection has been received.

**Send faxed letters requesting recognition as an interested party to:** (406) 329-3411. The fax coversheet must include "Custer Gallatin National Forest Land Management Plan Interested Person" in the subject line and should specify the number of pages being submitted. Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8:00 a.m. and 8:00 p.m., Eastern Standard Time, Monday through Friday.