



September 28, 2020

Regional Forester Leanne Marten  
Objection Reviewing Officer  
USDA Forest Service Northern Region  
Building 26  
Fort Missoula Road  
Missoula, MT 59804

Submitted online at: <https://cara.ecosystem-management.org/Public/CommentInput?Project=50185>

Re: Custer Gallatin National Forest Plan Interested Person Request

Dear Regional Forester Marten,

On behalf of National Parks Conservation Association (NPCA), I appreciate the opportunity to participate in the objection resolution process. NPCA has submitted substantive comments throughout the planning process (Assessment/scoping, draft EIS/Plan revision, final EIS/Proposed action). I am requesting that NPCA be included as an 'Interested Person' on any objections to the Custer Gallatin Forest Plan that may directly or indirectly impact Yellowstone National Park (YNP) resources both within and adjacent to the park boundaries. Relevant objections could be to forest-wide, management area, geographic area, or other desired conditions, objectives, standards, and/or guidelines that include:

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

- Wildlife, including habitat and management, connectivity, recovery, conservation of species and habitat (including but not limited to bison, grizzly bear, lynx, wolverine, whitebark pine), and 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 and increased recreation pressure, and human wildlife conflict.
- Bison management:  
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

**Yellowstone Field Office**

**321 East Main Street Ste. 424**

**Bozeman, MT, 59715**

**P 406.970.0734 | [kdougherty@npca.org](mailto:kdougherty@npca.org)**

**[NPCA.org](http://NPCA.org)**



**EST 1919**

Conservation Concern (SCC). In our letter we provided clear scientific reasoning as to why our organizations feel that bison should be listed as a 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.

**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.

**Yellowstone Field Office**

**321 East Main Street Ste. 424**

**Bozeman, MT, 59715**

**P 406.970.0734 | [kdougherty@npca.org](mailto:kdougherty@npca.org)**

**[NPCA.org](http://NPCA.org)**



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.

**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.

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. NPCA appreciates this opportunity to participate in the objection resolution process and provide input on behalf of our 1.3 million supporters and members.

Interested Persons on behalf of NPCA:

Kelsie Dougherty, GYE Fellow (lead objector)  
Dan Bailey, Yellowstone Program Manager  
Stephanie Adams, Northern Rockies Associate Director  
Betsy Buffington, Northern Rockies Regional Director

Sincerely,

Kelsie Dougherty  
Greater Yellowstone Ecosystem Fellow  
Yellowstone Field Office  
Bozeman, Montana

**Yellowstone Field Office**  
**321 East Main Street Ste. 424**  
**Bozeman, MT, 59715**  
**P 406.970.0734 | [kdougherty@npca.org](mailto:kdougherty@npca.org)**

**[NPCA.org](http://NPCA.org)**