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Comments: Our extended family is submitting our comments by January 6, 2017 to the Custer Gallatin National Forest on their Draft Assessment of Existing Conditions / Need to Change:

The Custer-Gallatin National Forest is revising its forest plan to guide how the agency makes decisions affecting the forest. The old plan has been in effect for 30 years and makes no mention of buffalo. Under the outdated plan, the Gallatin National Forest permitted the Montana Dept. of Livestock to setup traps on the forest to capture hundreds of buffalo that were shipped to slaughter. It's time for decision makers to serve the needs of this iconic native species that has naturally returned to land that is their birthright. Please get involved in the forest plan revision. This is our opportunity to advocate for managing habitat on America's National Forests for migratory buffalo!

The Forest is currently seeking public feedback on the draft Assessment of Conditions / Need to Change of the agency's Forest Plan, which has not been updated since 1987. The assessment is intended to evaluate local knowledge and the best available information about the forest and inform the development of the next Forest Plan. The deadline for the public to provide feedback closes on January 6, 2017 which doesn't give the public much time to offer meaningful input.

Forest plan revision is of utmost importance to the wild buffalo of Yellowstone country because the Custer Gallatin is the only National Forest occupied by wild, migratory and intact bison. Yet, the Custer Gallatin's draft assessment, seemingly evaluated, but did not identify bison as a potential Species of Conservation Concern.

According to the Forest Planning rule, a Species of Conservation Concern is defined as "a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area." 36 C.F.R. [sect] 219.9(c).

The Custer Gallatin identifies bison only as a Species of Interest, which is not defined in the Forest Planning rule, and is therefore a pointless designation. The Forest Planning rule requires the Custer Gallatin to document "in the report how the best available information was used to inform the assessment." 36 C.F.R [sect] 219.6.

Buffalo Field Campaign is asking the Custer Gallatin National Forest to review the best available scientific information to place native wild buffalo on the list of potential Species of Conservation Concern. For example, the International Union for Conservation of Nature lists bison as near threatened. Scientists consider bison ecologically extinct in their original range and estimate the wildlife species occupies less than 1% of their original habitat (Freese 2007; Sanderson 2008). The Montana Heritage Program and Montana Fish, Wildlife & Parks lists bison as a species of concern — a native Montana species considered to be "at risk" due to declining population trends, threats to their habitat and or restricted distribution.

It is imperative that the Custer Gallatin Forest Plan revision include bison on the potential list of Species of Conservation Concern to be decided by the Regional Forester. Without the agency's evaluation of the best available science supporting bison being on the list, the Regional Forester will have no assessment to decide the matter.

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