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Comments: Adopt Alternative D and List American bison as a Species of Conservation Concern

June 6, 2019

Custer-Gallatin National Forest Plan Revision

Custer-Gallatin National Forest

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Subject: Adopt Alternative D and List American bison as a Species of Conservation Concern

Custer-Gallatin National Forest:

Subject: Adopt Alternative D and list American Bison as a Species of Conservation Concern

As an American citizen and advocate for the protection and preservation of our National Mammal -- the country's last genetically pure wild buffalo -- I am writing to voice my strong support for Forest Supervisor Mary C. Erickson strengthening and adopting standards for Alternative D, the environmentally preferred decision in the Custer Gallatin National Forest plan. I also fully support Regional Forester Leanne M. Marten listing American bison as a species of conservation concern in Region 1.

Wild Bison are currently facing oblivion due to the Interagency Bison Management Plan (IBMP) developed by the National Park Service, USDA-Forest Service, USDA-Animal & Plant Health Inspection Service, Montana Department of Livestock and Montana Fish Wildlife & Parks, agencies whose mismanagement of wild buffalo to pander to the livestock industry has decimated the population of these magnificent beings to precariously low, nonviable levels by means of harassment, capture, quarantine, experiments, hunting and slaughter. Montana's intolerance and systematic persecution of wild buffalo, especially the relentless decimation of the genetically significant and irreplaceable Central Herd, is pushing this heritage species to the brink of extinction.

It is inappropriate for the Custer Gallatin to adopt the State's "management" as policy on the National Forest by going along with IBMP "tolerance zones" which destroy American buffalo naturally migrating into the dead zone. Moreover, prohibiting American bison from important habitat in the National Forest and disturbing migration corridors is a continuous threat to the diversity and viability of the remaining wild individuals of this unique and highly valued species.

As a native keystone species, the presence of wild buffalo greatly enhances the landscape, contributing to a healthy ecosystem and benefiting the surrounding wildlife, but they are also in grave danger of being managed to extinction by agencies that have arbitrarily chosen to protect special interests, namely ranchers, over that of declining wild bison and, therefore, this heritage species must be protected so that they may fulfill their critical role in restoring the ecological balance of nature in their historic range.

I strongly urge you to strengthen Alternative D by adopting the following standards and desired conditions:

* Conserving endangered American bison viability and diversity must be a forest-wide standard.

- * Freedom for endangered American bison to roam National Forest habitat must be a forest-wide standard.
- * Restoring habitat connectivity for endangered American bison should be a forest-wide standard.
- * To restore connectivity, and preserve the viability and diversity of endangered American bison's genetically distinct subpopulations, the Custer Gallatin must adopt a standard to close and not permit cattle grazing allotments in American bison range which will not only benefit American buffalo but other native wildlife as well.
- * To restore connectivity, and preserve the viability and diversity of native bighorn sheep populations, the Custer Gallatin must adopt a standard to not permit domestic sheep grazing in bighorn sheep range.
- * The best available scientific data supports including enforceable forest-wide standards to protect key linkage areas, habitat connectivity, and food security for threatened grizzly bears.
- * The Custer Gallatin must adopt a forest-wide standard for all grazing permits requiring "let-down" fencing and remove barriers that impede migration of native species.
- * Adopt a desired condition for the Custer Gallatin to be a leader in developing wildlife safe passages and measures on highways constructed in migration corridors on the National Forest.
- * Restore more wetlands, creek banks, pond edges, along with water, aquatic and riparian habitat through stronger standards and more yearly projects to benefit American buffalo and diversity of native species.
- * As American bison, an essential species that contributes greatly to animal and plant diversity, and fire each play an important ecological role, the Custer Gallatin must develop and fund a habitat restoration program and engage scientists and biologists with aboriginal knowledge of American buffalo and fire, which must be introduced to restore American buffalo habitat and connectivity to habitat.
- * The Custer Gallatin must fulfill its responsibilities and trust obligations to safeguard treaty rights, sacred species, sacred sites, such as the revered Ludlow Cave in the North Cave Hills, and other traditional cultural places of significance to aboriginal people which should be given the care, respect and strong protection they deserve.
- * The Custer Gallatin must recognize the best available scientific information of genetically distinct subpopulations of American bison in the Northern and Central Interior herds whose rare genetics are in grave danger of being wiped out.

The imperiled Central herd or subpopulation is being threatened and driven down under the stressors of the governor-approved plan IBMP. According to NPS biologists, the number of Central herd buffalo counted declined from 3,531 in 2006 to 847 in 2017. This unexplained and severe loss of a significant portion of the irreplaceable and vitally important Central herd during a time when more habitat was made available on the National Forest in State "tolerance zones," is seriously alarming and it is of paramount important to identify the cause and stop this decline.

America's few remaining genetically pure wild bison belong to ALL OF US and to future generations, but they are in grave danger of once again being driven to the brink so every effort must be made to ensure their future survival on our western landscape where they rightfully belong.

"Management actions" to restrict or impede natural migrations are in conflict with National Forest planning rule requirements to use the best available scientific information, restore habitat connectivity, and provide for the conservation and persistence of American bison on the National Forest.

I call on you to use the best available science and to select Alternative D and adopt strong standards for endangered American bison, bighorn sheep, threatened grizzly bears, wilderness, linkage corridors, habitat connectivity and water, and to list American Bison as a Species of Conservation Concern.

Sincerely,

Eileen Hennessy
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