Data Submitted (UTC 11): 8/14/2020 7:22:28 PM First name: Melissa Last name: Warfield Organization: Title:

Comments: I am writing to you to present my case that native American bison meets the National Forest planning rule criteria.

There is support from tribal, local and public to use the Custer Gallatin National Forest planning rule to benefit the native American bison. To provide habitat to meet the long-term concerns the public has raised for the bison. The Custer Gallatin Forest Service should heed the U.S. Congress' mandate to provide the American native bison's habitat in the new forest plan. The forest service along with the decision-makers are not including habitat standards protecting the migratory American native bison as a species of conservation concern in Region I. Please adopt strong standards to protect and benefit the migratory American native bison and their habitat on our National Forests.

The Custer Gallatin's proposed action for bison is unacceptable and unreasonable. Human development is accelerating and threatens natural habitats and wildlife corridors for migratory species including wild bison within the plan area. The loss of corridors and connectivity to habitat decreases viability and increases the risk of extinction for native bison. Human threats continue to jeopardize the viability of America's intact population of native bison to continue living in their original range in the lower 48 states. An alternative is offered in counterbalance to the regulatory threats and stressors American bison are confronted with in the plan area and beyond. I'm calling on the Custer Gallatin National Forest to uphold your trust obligation to the American Indian Nations and the American people. Please use your legal authority to ensure the future legacy of the native American bison that migrate within the plan area.

The scientific information does not support any conclusions made by Custer Gallatin's final draft assessment. Supervisor Mary Erickson's decision is to stop evaluating bison as a potential species of conservation concern and remove the bison from further consideration.

The removal of native bison genetic diversity is codified in Wyoming (Wyoming manages the removal of low numbers of bison in restricted areas. Wyoming law effectively reduces native bison genetic diversity to virtually zero), Montana and Idaho law (native bison are a critically imperiled species in the state of Idaho. Under Idaho's law, native bison are eradicated). There is no regulatory mechanism in place to ensure the native bison live within the plan area in Region I or on National Forests in Region 2 and Region 4.

I am asking the Regional Forester and Custer Gallatin National Forest to continue evaluating listing native American bison as a species of conservation concern in Region I.

If the bison meets the criteria of a species of conservation concern, the National Forest planning rule requires the Custer Gallatin to get the most updated information available. Make your best decision based on the available science that is transparent to the public. Habitat on the Custer Gallatin is the key to survival of the last American bison population that roams wild on their native range. There are two genetically distinct subpopulations within the Yellowstone bison population. American bison are near threatened with very few populations functioning as wild. Wild bison today are ecologically extinct only occupying less than 1 percent of their original range. Yellowstone ecosystem is the only place where grizzly bears and bison continue to evolve. Wild bison are held for future generations. Custer Gallatin has legal authority to ensure the viability of the migratory bison. So far Custer Gallatin has not done that.

The decision rests on an uninformed assessment and falls short of the National Forest planning rule requirements for landscape linkages (native bison are extinct or extirpated in four out of five landscapes in the

Custer Gallatin plan area. Bison viability and diversity is being depleted in the remaining landscapes), habitat connectivity (The Custer Gallatin has permitted barriers to impede native bison's natural migrations within the plan area. These barriers disrupt habitat connectivity the National Forest planning rule requires to be maintained or restored), native bison diversity and persistence. Custer Gallatin's management is guiding the forest planning, a new decision must be made based on substantial information where the action is warranted.

The U.S. Forest Service's livestock grazing program is a source of conflicts with grizzly bears, resulting in dead bears, displaces the bison which is a native species and key grizzly bear food source including within the plan area.

The National Forest planning rule supports listing native bison as a species of conservation concern because the migratory species provides a diversity of plant and animal communities that the National Forest Management Act requires to be protected. These key characteristics make bison an ideal food species to monitor ecosystem integrity.

I would like to see the bison persist as a viable and stable native species within the plan area.

Please list the native bison as a species of conservation concern in Region I.