

Data Submitted (UTC 11): 8/21/2020 4:23:33 AM

First name: Yvette

Last name: Tapp

Organization:

Title:

Comments: Migratory bison are prohibited from occupying any National Forest range and habitat in Zone 3, an arbitrary standard agreed to by state and federal managers including the responsible official. Clearly define a boundary line beyond which bison will not be tolerated. Interagency Bison Management Plan Members, Operating Procedures for the Interagency Bison Management Plan (IBMP) page 2 (Dec. 31, 2019). The boundary line the Custer Gallatin has agreed to excludes American bison from substantial portions of their National Forest range and habitat and cannot contribute to increasing the genetic diversity of distinct and unique bison herds in the Yellowstone ecosystem.

The final alternative must include standards constraining the Custer Gallatin, and imposing a legal duty to provide habitat for a viable population of American bison with "stable and increasing genetic diversity" on our National Forests. The Forest Service must "stop the practice of reflexively acquiescing to state claims of wildlife authority" and follow your duty to provide for diversity and viability of native species including American bison. Martin Nie et al., Fish and Wildlife Management on Federal Lands: Debunking State Supremacy, 47 Environmental Law 797, 905 (2017). * The Custer Gallatin's "guideline" to "not create a barrier to bison movement unless needed to achieve interagency targets for bison population size and distribution" guts the National Forest planning rule requirement for connectivity. 2020 Land Management Plan, Guidelines, FW-GDLWLBI-03, page 59 (July 2020). Connectivity. Ecological conditions that exist at several spatial and temporal scales that provide landscape linkages that permit the exchange of flow, sediments, and nutrients; the daily and seasonal movements of animals within home ranges; the dispersal and genetic interchange between populations; and the long distance range shifts of species, such as in response to climate change. 36 CFR § 219.19 Definitions, National Forest System Land Management Planning final rule and record of decision, 77 Fed. Reg. 21162, 21270 (Apr. 9, 2012). Forest Service management decisions restricting and impeding American bison's natural migrations are in conflict with National Forest planning rule requirements to use the best available scientific information, restore habitat connectivity, and provide for diversity and viability of distinct migratory herds on our National Forests.