

Data Submitted (UTC 11): 9/4/2020 4:46:33 AM

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Comments: I am a concerned citizen writing in support of Buffalo Field Campaign's advocacy for listing the American bison as a species of conservation concern. I have been writing letters on this subject since the implementation of the Interagency Bison Management plan, which I opposed. I emphasize this statement from a longer document submitted by Buffalo Field Campaign. Thank you for your consideration.

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. Conserving mass migrants means preserving animals' freedom of movement in response to the temporal aspects of forage across seasonal extremes. This requires understanding basic parameters of the migration (e.g. location, numbers, routes, distances traveled), ecological drivers, habitat needs and threats. When migrants are excluded from forage and water resources, their numbers plummet and migrations disappear.

Grant Harris et al., Global decline in aggregated migrations of large terrestrial mammals, 7 Endangered Species Research 55, 72 (May 2009).

American bison have already suffered the loss of 14 migration routes or corridors in the Yellowstone ecosystem.

Joel Berger, The Last Mile: How to Sustain Long-Distance Migration in Mammals, 18(2) Conservation Biology 320, 322 (April 2004).

Migration is an essential life-history strategy for American bison allowing for adaptation in a rapidly changing environment and evolutionary resilience in a climate that is being disrupted on a global scale.

Bison's long-distance migrations, corridor use, and connectivity to habitats in their home range needs to be proactively managed so these phenomena do not become endangered within the Custer Gallatin planning area.

Reducing migrants through over-killing or removing range contributes to habitat loss, population declines, shortens the distances migrants can travel, and can destroy mass migration and drive migratory species to extinction. Grant Harris et al., Global decline in aggregated migrations of large terrestrial mammals, 7 Endangered Species Research 55, 68 (May 2009).