

Data Submitted (UTC 11): 9/28/2020 6:04:22 PM

First name: Chamois

Last name: Andersen

Organization: Defenders Of Wildlife

Title: Senior Representative

Comments: Sept. 28, 2020

USDA Forest Service

Rocky Mountain Region

Attn: Objection Reviewing Officer, Northern Region Office, Deputy Regional Forester (Objection Reviewing Officer)

Project: Custer Gallatin Forest Plan Revision

Subject: Request for interested person status to several objections to bison management amendment

Requester: Chamois Andersen

Defenders of Wildlife

715 Iverson St.

Laramie, WY 82070

candersen@defenders.org

307-460-8079

Dear Reviewing Officer:

On behalf of Defenders of Wildlife, I am requesting recognition as interested persons to the objections filed by the Sweet Grass County Commission and the Buffalo Field Campaign. We submitted substantive scoping comments, comments on the draft environmental impact statement (March 21, 2018 and June 6, 2019), and an objection (Sept. 9, 2020).

I have a significant interest in any potential modifications to the Custer Gallatin Forest plan that may affect bison conservation and management. I, therefore, would like to be included as an interested person on the following objections for the reasons stated below.

* Bill Wallace, Chairman, James V. Moody, County Commissioner and Melanie Roe, County Commissioner, Sweet Grass County Commission, objection dated: September 8, 2020

We are interested in this objection primarily because changes made to the revised plan, based on some objection requests, could impact bison expansion into suitable habitat on the Custer Gallatin National Forest as well as prohibit the establishment of a year-round herd.

o No expansion of bison in the Forest's revised land management plan, which the objector advocates, would lead to the Custer Gallatin National Forest not carrying out its role as a member of the Interagency Bison Management Plan and toward the goal of a wild free-ranging bison population, which includes the planning area, representing 88% of the lands in the designated tolerance zone outside of Yellowstone National Park. The objector, not supporting the expansion of bison into the Custer Gallatin is also counter to the Custer Gallatin Forest's role to provide and improve suitable habitat for bison to access and utilize.

* James Holt, Executive Director, Darrell Geist, Habitat Coordinator, Buffalo Field Campaign, objection dated: September 8, 2020

We are interested in this objection primarily because we support the determination of bison as a Species of Conservation Concern (SCC) and agree with the objector about the credible and relevant scientific evidence raising substantial concern about Plains bison's ability to persist as a viable, self-sustaining migratory species in the Custer Gallatin National Forest planning area.

o The objector's comments (as well as Defenders of Wildlife's scoping comments) provided a strong scientific argument for a determination of bison as a SCC. Bison as a SCC would afford the proper protections needed for long term viability of the species as well as toward overall restoration of Plains bison across the West, with Yellowstone bison as a vital resource. The objector and Defenders also explained the numbers and historic bison range, to illustrate the species' occurrence in the planning area, and provided scientific evidence as to why there is substantial concern about its capability to persist over the long term; both requirements for an SCC decision.

Sincerely,

Chamois Andersen
Senior Representative
Defenders of Wildlife