

**Comments in support of strengthening Alternative D
(Draft April 3, 2019)**

List American Bison as a Species of Conservation Concern.

The best available scientific information supports the Regional Forester listing American bison as a species of conservation concern.

The Regional Forester needs to provide a reasoned response to the evidence in support of listing presented in public comment.

Strengthen Alternative D.

The best available scientific information supports strengthening alternative D with stronger standards for American bison.

Protecting American bison viability and increasing diversity should be a forest wide standard.

Freedom for American bison to roam National Forest habitat should be a forest wide standard.

Connectivity to habitat for American bison should be a forest wide standard.

The Custer Gallatin should initiate a habitat recovery program and provide funding to recruit scientists and biologists with aboriginal knowledge of American bison and fire.

American bison habitat recovery projects should be forest-funded and done in collaboration with scientists and biologists from American Indian Tribes with ancestral ties and treaty rights to the National Forest.

In its' direction for American bison, the Custer Gallatin must rely upon the best available scientific information.

The State of Montana's arbitrarily defined zones for American bison on the National Forest are not based on the best available scientific information.

The Interagency Bison Management Plan is not based on the best available scientific information.

The Interagency Bison Management Plan is a flawed plan operating on an outdated Environmental Impact Statement (the 15-year life of the plan analysis expired in 2015).

The Custer Gallatin must recognize the best available scientific information of genetically distinct subpopulations of American bison in the Northern and Central Interior herds.

The Central herd or subpopulation is under threat and being driven down under the stress of the Interagency Bison Management Plan.

According to National Park Service biologists, the number of Central herd buffalo declined from 3,531 in 2006 to 847 in 2017.

It is improper for the Custer Gallatin to adopt the State's "management" as policy on the National Forest – an ongoing stressor that threatens American bison and their habitat.

Reintroduce fire to restore American bison habitat and connectivity to habitat.

In its' direction for American bison and connectivity to habitat, the Custer Gallatin should develop and fund a program to reintroduce fire.

Given the range of American Indian Nation ties to and knowledge of the aboriginal territories on the Custer Gallatin, and each Treaty and public trust responsibility the National Forest is legally mandated to fulfill, the Custer Gallatin has the authority to build relationships to support such an endeavor.

Given the National Forests are governed by separate Treaties reserving rights for at least eighteen American Indian Tribes, aboriginal leaders are in the best position to provide direction, guidance, and involvement in the preservation of American bison diversity and recovery of the species' habitat.

Fire and fuels management funding should be included and designated for the recruitment of scientists and biologists from American Indian Tribes with ancestral ties and or treaty rights to the National Forest.

Buffalo Field Campaign encourages the involvement and leadership of American Indian Tribes in cooperatively developing a National Forest funded program to expand the science of American bison ecology and fire.

Exclude logging trees as a "habitat improvement project" for American bison.

Exclude spraying toxic compounds as a "habitat improvement project" for American bison.

The standard for habitat restoration projects on the Custer Gallatin is best measured based on the acres of habitat and connectivity to habitat American bison use.

The number of "enhancement projects" is not in itself a reliable indicator to measure benefits to American bison.

Acres of habitat used and the area of expanded habitat used is a better indicator to measure and monitor progress for year-round, self-sustaining populations of American bison.

If the Custer Gallatin is correct that 292,000 acres of American bison habitat is available (on one landscape), the direction must be on fire ecology projects that enhance natural migration, access and connectivity to habitat across the National Forest.

The Custer Gallatin must close and remove livestock grazing allotments to benefit American bison, grizzly bears, and bighorn sheep.

Renewing livestock grazing allotments in American bison habitat is in conflict with the desired condition of year-round, self-sustaining populations of American bison on the National Forest.

American bison are an important grizzly bear food. Both native species would benefit from removing livestock to prevent depredations resulting in dead bears and conflicts (with the State) resulting in dead bison.

The presence of domestic sheep and cattle is a barrier for American bison to year-round access and connectivity to National Forest habitat.

Closing and removing domestic sheep allotments would prevent the introduction of deadly and contagious diseases to American bison and bighorn sheep.

We strongly support the Regional Forester listing bighorn sheep as a species of conservation concern.

We strongly support strengthening standards for protecting key linkage areas, connectivity to habitat, and food security for threatened grizzly bears.

The Custer Gallatin must adopt a standard for all livestock grazing permits requiring “let-down” fencing and remove barriers that impede wildlife migration.

The Custer Gallatin must not permit and remove barriers to habitat and connectivity to habitat including: government traps, fencing schemes in migration corridors, cattle and sheep allotments, and state of Montana intolerance zones which the Custer Gallatin has adopted through its’ voluntary participation in the Interagency Bison Management Plan.

Vacated grazing allotments must be prioritized for closure and fencing removed to enhance wildlife habitat, connectivity to habitat, and water quality.

Water, aquatic, and riparian habitat must be managed with stronger standards.

Restoring more wetlands, creek banks, and pond edges through strong standards and more yearly projects will benefit American bison and native species diversity.

We strongly favor stronger, more rigorous protections and projects year-round to restore the ecological integrity of watersheds across the Custer Gallatin.

Treaty rights, sacred species, sacred sites and traditional cultural places must be given the utmost care and strongest protection.

Buffalo Field Campaign’s late co-founder Rosalie Little Thunder was a leader in protecting the buffalo, a sacred species.

Ludlow Cave in the North Cave Hills is revered as a sacred place from which the buffalo first emerged. Traditional cultural places and sacred sites must be given the utmost care, respect, and protection.

The Custer Gallatin is within the aboriginal territories of the:
Great Sioux Nation
Fort Peck Assiniboine & Sioux Tribes
Northern Cheyenne Tribe
Crow Tribe of Indians

Blackfeet Nation
Piikani Nation
Eastern Shoshoni Tribe
Northern Arapaho Tribe
Shoshone–Bannock Tribes
Nez Perce Tribe
Confederated Salish & Kootenai Tribes
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes & Bands of the Yakama Nation
MHA Nation Mandan, Hidatsa, & Arikara – Three Affiliated Tribes
Standing Rock Sioux Tribe
Cheyenne River Sioux Tribe
Lower Brule Sioux Tribe
Rosebud Sioux Tribe
Oglala Sioux Tribe of the Pine Ridge Indian Reservation
Crow Creek Sioux Tribe

We concur with the respective Nations who have let it be known the Custer Gallatin must fulfill its' responsibilities to safeguard treaty rights, sacred species, sacred sites, and traditional cultural places of significance to aboriginal people.