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Comments:

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 The Interagency Bison Management Plan is a flawed plan operating on an outdated Environmental Impact Statement (the 15-year life of the plan analysis expired in 2015).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