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I would like to express my support for Alternative D. However it needs to be strengthened.

Firstly, list American Bison as a Species of Conservation Concern. The best available scientific advice supports the Regional Forester backing this essential step. As a keystone species all decisions made to benefit the bison will benefit the entire ecosystem and should be the standard against which all decisions are made throughout the plan. This will in turn support bighorn sheep and threatened grizzly bears. Success is then determined by the acreage used by these species - not the overall number of habitat restorations successfully completed.

Freedom is essential. For bison to retain and increase their freedom, wildlife corridors should be a priority. Alternative D highlights actions that improve or facilitate opening corridors for bison movement. However the most pressing issue keeping bison from roaming free is the presence of cattle grazing within the bison's range. Bighorn sheep - another scientifically recommended Species of Conservation Concern - a status that the Regional Forester also needs to support - are similarly impacted by domesticated sheep. This creates human/cattle/bison, human/sheep/bighorn and human/calf/lamb/bear conflict which could all be significantly reduced by closing existing grazing areas and banning future grazing permits within the bison range. This will also see the removal of all associated fencing - and especially traps - from the area. Outside of this range, all fencing should be able to be 'let down' to enable these wild species to roam freely; particularly addressing the issue of the grizzly bear's physical and genetic isolation.

The State of Montana currently has in place bison 'tolerance zones'. This language implies that bison are nothing other than a pest. They are not. They are a keystone species under ever increasing pressure to the point of concern for their population. These tolerance zones are part of the Inter-agency Bison Management Plan. It is a way for the state to be seen to be doing something (entirely on its own terms) whilst in reality destroying the wider ecology. This is supported by the fact that despite these tolerance zones increasing - allowing the buffalo more space - the population dropped in 2017 to just over one fifth of what it was in 2006 (a loss of 2684 individuals).

The voluntary participation of Custer Gallatin in the Bison Management Plan inadvertently lends support to both tolerance zones and dead zones (zone 3) - in contradiction to the freedom that is meant to be granted to bison via Alternative D. This exclusion of buffalo from the majority of zone 3 forest habitat is disgraceful and the major cause of the decline of the species. I would suggest that Custer Gallatin National Forest distance itself from it immediately.

The Bison Management Plan was 15 years old when it expired in 2015 - four years ago! The science that it was loosely based on is old and the anti-bison bias within it is now unjustifiable. It remains static - it has not evolved in any way to reflect changing circumstances. There are huge data gaps in the Interagency Bison Management Plan regarding the size of the bison population. Without detailed population figures there are no foundations on which to justify any actions - least of all killing. There is subsequently no joined up thinking across the agencies involved in bison management and no accountability or transparency. Yet the indiscriminate killing of a huge number of the population - including the destruction of individuals that are essential to maintaining the herd's knowledge and ability to migrate (similar to elephants) - continues unabated. With no official detailed objectives

regarding the bison population set out in the Annual Management Plan there are no standards to reach; resulting in a mishmash of harmful actions year after year. The bison are suffering immensely because of it.

The State has shown via its 'Management Plan' that it can not be relied upon to use the current best scientific advice or put the best interests of the forest and the genetically distinct sub-populations of American bison at the center of its decision making to enhance habitat connectivity - let alone recognize the importance of the species - all of which Custer Gallatin must do to meet planing rule requirements. State law Mont.Code Ann. § 81-2-120 is essentially in diametrical opposition to what needs to be achieved.

Habitat restoration should involve the utilization of fire. Unlike other management options (logging, spraying), fire restores habitat and it is something that animals instinctively know to avoid. This should be carried out under the guidance of Native American tribes. They should be consulted on a whole range of management issues; building a relationship that goes far beyond just fulfilling treaty rights and enabling them to become involved in saving a species scared to them.

To protect wilderness the area that the final plan covers must include the 230,000 acres of wilderness of the Gallatin Range. All activities (especially mechanical and motorized) not consistent with wilderness should be prohibited. This includes large groups of animals and humans above 8 and 12 respectively in the Absaroka-Beartooth and Lee Metcalf Wildernesses. Numbers above these significantly increases the harm caused to wilderness areas. The feces of these animals is also contaminating streams and lakes, whilst adding fish stocks to areas that have not historically contained them is also impacting on the areas natural state.

In summary Custer Gallatin needs to implement a stronger version of Alternative D - backed up by regulatory mechanisms in order for the ideal buffalo habitat to materialize. The Endangered Species Act empowers Custer Gallatin to recover a Species of Conservation Concern. With three such species causing concern and/or endangered the teeth of this act needs to be used to fight and remove the existing mentality of killing and imprisoning buffalo. Backed up by the best available scientific advice we can finally start to see buffalo, bighorn sheep and grizzly bear populations recover and thrive after years of persecution and flawed conservation leadership.