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Comments:

Scientific information supports the Regional Forester listing American bison as a species of conservation concern in Region 1.

Region 1's Regional Forester must provide a reasoned response to the evidence presented in public comment in support of listing American bison as a species of conservation concern.

The best available scientific information supports strengthening alternative D with strong enforceable standards for American bison, bighorn sheep, and threatened grizzly bears.

Conserving American bison viability and 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.

To restore connectivity, and conserve the viability and diversity of American bison's genetically distinct subpopulations, the Custer Gallatin needs to adopt a standard to close and not permit cattle grazing allotments within American bison range.

The Custer Gallatin must adopt a forest wide standard for all grazing permits requiring "let-down" fencing and remove barriers that impede migration of native species.

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

The Custer Gallatin has a duty to fulfill its' responsibilities and trust obligations safeguarding treaty rights, sacred species, sacred sites, and traditional cultural places of significance to aboriginal people.

The State of Montana's arbitrarily defined "tolerance zones" for American bison on the National Forest are 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The Interagency Bison Management Plan is a flawed plan operating on an outdated Environmental Impact Statement (the 15-year life of the plan analysis expired in 2015).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 15-year life of the plan analysis could not and did not foresee impacts to the bison population and the ecosystem beyond this timeframe. See e.g., U.S. Dept of the Interior & U.S. Dept. of Agriculture Vol. 1 (Aug. 2000) (enter "life of the plan" into Adobe Reader's find feature for examples).

Indeed, after providing notice of its intent to prepare a new Environmental Impact Statement, the State of Montana and Yellowstone National Park have failed to produce any new decision based on an updated scientific analysis. 80 Fed. Reg. 13603 (March 16, 2015).

In theory, the Interagency Bison Management Plan is an adaptive one based on science. In practice, it is not.

Manager's decisions lack "accountability and transparency," and more often resemble "trial and error or crisis management, rather than adaptive management." In a three tiered-step plan, managers lack "linkages" to get to the next steps, and have "lost opportunities to collect data" to resolve "important uncertainties" in the absence of a scientific monitoring plan. "Park Service, APHIS, and Montana Department of Livestock officials also told us that they are not testing any hypotheses or the assumptions on which the plan is based." These flaws have impaired decisions by managers who do not share defined objectives. "Meanwhile, the federal government continues to spend millions of dollars on uncoordinated management and research efforts, with no means to ensure that these efforts are focused on a common outcome that could help resolve the controversies." U.S. GAO 2008 at 24, 28, 33.

The flaws in "adaptive management" continue a decade after the Government Accountability Office issued its report, as managers "no longer build their meetings, interactions, and decisions around their AM [Annual Management] Plan; no longer measure their performance against the metrics put forth in their AM Plan (including no longer building their Annual Report on measuring their performance against metrics set forth in the AM Plan); no longer rigorously follow the Partner responsibility matrix declared under each Management Action described in the AM Plan (and also in the Partner Protocols); and no longer use adaptive changes to their AM Plan to drive changes in their Winter Ops Plan." Bischke 2017 entire.

In spite of significant changes in federal brucellosis rules benefitting cattle ranchers in the tri-state region, managers have failed to account for the changed circumstances favoring natural regulation of bison in the wild. See e.g., Montana Dept. of Livestock 2013 (approving maintaining an 'actionable' zone to haze bison from "breaching the tolerance zone"); Yellowstone National Park 2011 (permitting the taking of 104 bison for USDA APHIS's study of GonaCon, a chemical sterilant); National Park Service 2015 at 13603-13604 (5 of 6 proposed alternatives would severely curtail bison range and or abundance in the ecosystem, intensively manage bison rather than cattle, and continue the practice of selecting against disease - and disease resistance - in the bison genome through culling, vaccination, and sterilization).

It is improper for the Custer Gallatin to adopt the State's "management" as policy on the National Forest.

State law, Mont. Code Ann. § 81-2-120 and the governor-approved plan it calls for, is a stressor and potential threat to American bison and their habitat throughout the life of the next forest plan.

"Management actions" to restrict or impede natural migrations are in conflict with National Forest planning rule requirements to use the best available scientific information, restore habitat connectivity, and provide for the conservation and persistence of American bison on the National Forest.

Do not make the erroneous assumption that the State of Montana will initiate - or even consider over the life of the next forest plan - an adaptive change that would benefit American bison on National Forest habitat.

It is just as plausible that with a change in the Governor's office or the Montana legislature, the State's arbitrarily defined "tolerance zones" would result in habitat loss for American bison on the National Forest.

The Custer Gallatin must recognize the best available scientific information of genetically distinct subpopulations of American bison in the Northern and Central Interior herds. Halbert et al. 2012 entire.

The Central herd or subpopulation is under threat and being driven down under the stressors of the Interagency Bison Management Plan, the governor-approved plan Mont Code Ann. § 81-2-120 calls for.

According to National Park Service biologists, the number of Central herd buffalo counted declined from 3,531 in 2006 to 847 in 2017. White et al. 2011 at 1329; Geremia et al. 2017 at 1.

The unexplained loss of a significant portion of the Central herd buffalo in a period of time when more habitat was available on the National Forest in State "tolerance zones," is a grave cause of concern.

Through its' voluntary participation in the Interagency Bison Management Plan, the Custer Gallatin has adopted arbitrarily defined State "tolerance zones" that destroy American bison naturally migrating into the dead zone (Zone 3) on the National Forest.

How much National Forest habitat are American bison excluded from in Zone 3?

How many migration corridors for American bison are disrupted in Zone 3?

How does the Custer Gallatin reconcile adopting Zone 3 with the National Forest planning rule requirement to maintain or restore connectivity?

Excluding American bison from a significant portion of National Forest habitat and disrupting migration corridors threatens the viability and diversity of a truly unique population of migratory American bison remaining in the wild.