

Date submitted (Mountain Standard Time): 3/28/2019 8:44:00 PM

First name: Croitiene

Last name: ganMoryn

Organization:

Title:

Official Representative/Member Indicator:

Address1: 6211 SE 24th Ave

Address2:

City: Ocala

State: FL

Province/Region:

Zip/Postal Code: 34480

Country: United States

Email: adanto@jps.net

Phone: 3526204708

Comments:

I am writing you to present the case that American bison meet the National Forest planning rule criteria of and should be listed as a species of conservation concern in Region 1.

There is broad tribal, public, and local support for the Custer Gallatin to use your National Forest planning rule to benefit wild bison, and provide habitat to meet the long-term viability concerns the public has raised for this iconic keystone species. The Custer Gallatin must also heed the U.S. Congress's mandate to provide native bison diversity in the new forest plan.

The Custer Gallatin's proposed action for bison is unreasonable and unacceptable. Human threats and stressors continue to jeopardize the viability of America's only intact population of wild American bison to continuously inhabit their original range in the lower 48 states. We call upon the Custer Gallatin to uphold your trust obligation to American Indian Nations and the American people, and use your legal authority to ensure the future legacy of wild migratory bison persists within the plan area.

The best available scientific information does not support the conclusions made in the Custer Gallatin's final draft assessment, and Supervisor Mary Erickson's decision, to stop evaluating wild bison as a potential species of conservation concern and remove the native species from further consideration.

Managing for the removal of wild bison genetic diversity is codified in Montana, Wyoming, and Idaho law, and there is no regulatory mechanism in place to ensure wild bison persist within the plan area in Region 1 or on National Forests in Region 2 and Region 4.

I am asking the Regional Forester and the Custer Gallatin National Forest to continue evaluating and list wild bison as a species of conservation concern in Region 1.

In evaluating whether bison meet the criteria of a species of conservation concern, the National Forest planning rule requires the Custer Gallatin to rely upon the most accurate, reliable, and relevant information, and make your decision based on the best available science that is transparent to the public. The Custer Gallatin has not done so.

The presumptive decision already made rests on an uninformed assessment and falls short of National Forest planning rule requirements for landscape linkages, habitat connectivity, wild bison diversity and persistence. If adaptive management is guiding forest planning, then a new decision can and should be made based on substantial information that the action is warranted.

The Custer Gallatin has acknowledged receiving hundreds of letters in support of evaluating and listing migratory bison as a species of conservation concern. More than twelve hundred people submitted their support online. Based on what was heard during the Custer Gallatin's planning meetings, there is a broad section of people who want to see wild bison persist as a viable native species within the plan area.

Please consider the best available scientific information presented in the Buffalo Field Campaign's report and rationale in support of continuing the public process for evaluating and listing wild bison as a species of conservation concern in Region 1.

Sincerest Regards,