

January 4, 2010

Susan LaMont
Hebgen Lake Ranger District
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Subject: Watkins and South Fork AMP Update

Dear Susan LaMont,

Buffalo Field Campaign, Western Watersheds Project and the following individuals are interested in staying involved in the Watkins Creek and South Fork Allotment Management Plan and would prefer to receive future mailings by email:

PROJECT INTEREST CONFIRMATION EMAILING LIST

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“Buffalo Field Campaign - Media” <bfc-media@wildrockies.org>

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Thank you for the opportunity to comment on this important matter.

Buffalo Field Campaign was founded in 1997 to stop the slaughter of Yellowstone's wild buffalo herd, protect the natural habitat of wild free-roaming buffalo and native wildlife, and to work with people of all Nations to honor the sacredness of the wild buffalo.

Buffalo Field Campaign is located in West Yellowstone, Gallatin County, Montana, and is supported by volunteers and citizens in Montana, Idaho and Wyoming, and by people from around the world who value America's native wildlife and the ecosystems upon which they depend, and enjoy the natural wonders of our irreplaceable public lands.

As an organization and on behalf of its members, Buffalo Field Campaign is concerned and actively involved with protecting the last remaining descendants of indigenous bison in North America to occupy their original range in the Greater Yellowstone ecosystem. Buffalo Field Campaign actively publicizes the plight of the bison, to end their slaughter by government agencies, and to secure long-term protection for viable populations of wild bison and year-round habitat in the Greater Yellowstone ecosystem. Buffalo Field Campaign actively engages the American public to honor our cultural heritage by allowing wild buffalo to exist as an indigenous wildlife species and fulfill their inherent ecological role within their native range, and serve as the genetic wellspring for future wild, free ranging bison populations.

Western Watersheds Project (WWP) is a regional, membership, not-for-profit conservation organization, dedicated to protecting and conserving the public lands and natural resources of watersheds in the American West. WWP has its headquarters at the Greenfire Preserve in Custer County, Idaho; and is supported by more than 1,400 members located throughout the United States, including in Montana. WWP's Montana office and its two Montana staff, are located in Missoula, Montana. WWP also has offices and other staff in Boise, Hailey, and Salmon, Idaho, Wyoming, Utah, Arizona, and California. Through these staff, and with the assistance of numerous unpaid members and supporters, WWP is deeply involved in seeking to improve livestock grazing management on federal and state public lands, including on federal lands. WWP is also involved in seeking to protect native wildlife and their habitat across the west, including bison and sage grouse.

Western Watersheds Project, as an organization and on behalf of its members, is concerned with and active in seeking to protect native, wild bison, and to protect and improve bison habitat in the Greater Yellowstone Ecosystem (GYE). WWP is also active in reviewing and commenting upon agency decisions and actions and otherwise participating in efforts to eliminate conflicts between livestock and native wildlife such as bison; in publicizing accurate information about the minimal threat of brucellosis, promoting alternative management that would protect bison with minimal or no threat of brucellosis transmission; promoting and educating the public and government agencies about the ecological, economic, and other benefits of protecting wild, free-roaming bison and their habitat.

Western Watersheds Project, as an organization and on behalf of its members, is concerned with and active in seeking to protect sage grouse and their habitat across the west, including in the GYE. WWP is actively seeking Endangered Species Act (ESA) protection for the imperiled sage grouse, and has litigated to enforce federal agency protective obligations in land management decisions.

LACK OF FOREST SERVICE PERSONNEL AVAILABLE DURING THE SCOPING PERIOD; FEW RESOURCES ONLINE

The Forest needs to be mindful when it proposes an action during the holidays to have its resource people available *during the scoping period* to provide information, records, and data so the public can get timely access to inform our scoping comments.

John Hunter Terry visited the Hebgen Lake Ranger District office to obtain information on South Fork and Watkins Creek, wildlife on the Gallatin National Forest and the District's grazing program. Forest personnel were either unavailable or could not provide access to records sought to help develop our scoping comments.

A MAC OSX computer with a Firefox web browser set to accept cookies conducted a search of documents referenced in your scoping document on U.S. Forest Service web sites. A search of "Gallatin National Forest Riparian Framework" and "Riparian Framework" returned this:

<http://www.fs.fed.us/cgi-bin/texis/searchallsites/search.allsites/>

Gateway Timeout

The proxy server did not receive a timely response from the upstream server.

Reference #1.5c91d340.1262376994.0

<http://www.fs.fed.us/cgi-bin/tehis/searchallsites/search.allsites/>

Internal Server Error

The server encountered an internal error or misconfiguration and was unable to complete your request.

Please contact the server administrator, root@svinet2.fs.fed.us and inform them of the time the error occurred, and anything you might have done that may have caused the error.

More information about this error may be available in the server error log.

We also ask the Forest Service to incorporate as part of its scoping process, public site visits to view the allotments with District biologists and scientists.

For these reasons, Buffalo Field Campaign and Western Watersheds Project asks for a scoping period extension, public notice of the extension to provide additional time to gather more information for the Forest Service's scoping process, and site visits to look at the allotment.

Scope of the Decision to Be Made

The District writes: "The scope of this analysis is limited to the effects associated with livestock grazing and associated activities on the Watkins and South Fork Allotments."

Buffalo Field Campaign and Western Watersheds Project submit that the scope of the decision to be made must also include viability of indigenous plant, wildlife and fish species.

A goal of the Gallatin National Forest Plan is to "Provide habitat for viable populations of all indigenous wildlife species . . ." (United States Department of Agriculture, Forest Service, Gallatin National Forest Land and Resource Management Plan, PAGE II-1, 1987).

The Gallatin National Forest's principal role in the Interagency Bison Management Plan is to "provide habitat for bison" (Bison Management Plan for the State of Montana and Yellowstone National Park 2000).

The American bison is indigenous to the Yellowstone ecosystem and have been observed on the Gallatin National Forest in the period since the Forest Plan was issued in 1987.

Buffalo Field Campaign has observed and recorded bison migrations into Hebgen basin for more than a decade. A searchable database of some of our observations is online for your review:

<http://wildlife.buffalofieldcampaign.org/>

Buffalo Field Campaign generated a report from our database (BFC_Bison observations Hebgen Basin 2002-2009) of bison observed on Gallatin National Forest lands and adjoining habitat in the Hebgen basin during two time periods in May through the years 2002-2009.

It is evident that suitable habitat exists for native bison migrating into Hebgen basin including wintering range (Gates et al 2005) and calving grounds (BFC report). Female bison have repeatedly demonstrated natal fidelity to calving grounds on the Gallatin National Forest and continue to teach their offspring the timing of migration and selection of suitable calving habitat.

All of our observations are consistent with the fact that Gallatin National Forest lands in the Hebgen basin provide suitable bison habitat and are consistently utilized by bison migrating onto and through the Forest. By no means are these observations limited to Horse Butte peninsula, the south side of Hebgen Lake, the burn in particular (and accessible habitat that will eventually burn in the basin), the Madison River corridor, the South Fork, and corridors in Duck Creek and Cougar Creek. From our observations, it is also evident that bison are migrating through Gallatin National Forest lands in and around Targhee pass to habitat on the Targhee National Forest.

Therefore, Buffalo Field Campaign and Western Watersheds Project requests that either as part of this scoping process or separately to inform this scoping process, the Forest Service conduct a suitability analysis of its grazing allotment program in the Hebgen basin to identify and manage habitat for bison currently occupied by cattle grazing on the Gallatin National Forest.

Part of our justification for a suitability analysis is the belief that the Hebgen Lake Ranger District's cattle grazing program is adversely impacting the ability of wild buffalo to inhabit the Gallatin National Forest in a manner that supports species viability.

The National Forest Management Act (NFMA 219.19) requires the Forest to provide habitat for species viability:

“The Forest Service shall manage fish and wildlife habitat to maintain viable populations of existing native and desired non-native vertebrate species in the planning area. For planning purposes, a viable population shall be regarded as one which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area.” (online: <http://www.fs.fed.us/r1/projects/aquatic-ecology/revision.shtml>)

In addition to the guidance provided by the National Forest Management Act, we believe a suitability analysis is appropriate and warranted given the conservation status of American bison on the Gallatin National Forest, in Montana, and in North America.

Dr. Mary Meagher, Yellowstone National Park's bison biologist for more than 30 years, believes that 10,000 years ago at the end of the last Ice Age, glacial retreat opened up range for bison migrating from surrounding river valleys that followed plant green up to the Yellowstone Plateau (**Gates et al. 2005**). Yellowstone's unique geothermal features opened winter range for bison to occupy habitat year round (**Meagher 1973**).

Archeological investigations suggest large numbers of bison occupied the Greater Yellowstone region (**Cannon 2001**) and that climatic regimes played an important role in bison distribution, seasonal migration and abundance (**Cannon 1997**). In a review by Schullery (2006) of native bison in the Greater Yellowstone region found: “Bison were spectacularly abundant in lower river valleys and prairie habitats, and were all but exterminated from those areas by the close of the study period. Contrary to still-popular belief, bison and other large herbivores were not “driven into higher country” by settlement, but inhabited those higher regions as environmental conditions permitted prior to the arrival of Euro-Americans.”

The wild American bison is a land-intensive species that once roamed over great distances (**Boyd and Gates 2006**). Long distance migration, what defines wild bison as a nomadic, herd animal that once thundered across the plains, is in danger of extinction.

Berger (2004) examined the "ecological phenomena" of accentuated treks of native ungulates in Yellowstone and found that 100% of historic and current routes for bison have been lost.

Bison corridors and habitat on National Forest lands in the Madison, Gallatin and Yellowstone river valleys exist (**Jourdonnais 2006; Lemke 1997; Lemke 2006**) but the US Forest Service does not manage habitat in a manner supporting viable wild bison populations despite its stated forest plan goal of providing "habitat for viable populations of all indigenous wildlife species..." (**Gallatin National Forest Land and Resource Management Plan, PAGE II-1, 1987**).

Yellowstone bison represent a distinct population both geographically and reproductively isolated from other bison populations (**USFWS 2007**).

Greater than 95% of the 500,000 bison in North America today reside in private ownership (**Boyd 2003**). Less than 1.5% of bison are genetically *Bison bison* (**Freese et al. 2007**). Forced cattle-bison breeding experiments to commercially exploit survival attributes of wild bison resulted in widespread introgression of cattle genes in private and public bison herds (**Polziehn et al. 1995; Ward et al. 1999; Schnabel et al. 2000; Halbert 2003; Halbert and Derr 2007**).

Throughout the United States, bison populations are intensively managed on small ranges, fenced off, rounded up, artificially bred, or have been found to have European or African cattle genes (**Boyd 2003**).

Only three bison populations can be proven to be genetically *Bison bison*: Yellowstone, Wind Cave and Grand Teton (**Halbert 2003**). And only the Yellowstone bison exist in a unique ecological setting as the last wild herd of bison in the United States to continuously occupy their native range since prehistoric times (**Gates et al. 2005; USFWS 2007**).

Wild bison currently occupy a fragment of their original range (**Hornaday 1889; Boyd 2003**). With the exception of Wyoming, wild bison are ecologically extinct throughout the United States (**Freese et al. 2007**).

While vast tracts of the American bison's historic range exist, current government schemes ([Interagency Bison Management Plan](#)) forcibly prevent bison from occupying their native range.

Human impacts to bison ecology and habitat are not confined to Yellowstone's boundaries (**Bjornlie and Garrott 2001; Gates et al. 2005**). Grazing cattle on the Gallatin National Forest adjacent to Yellowstone National Park precludes bison from occupying their native habitat (**Geist 2007**).

Human activities outside the Park is reducing the availability of bison habitat and forage while land use and winter recreation inside the Park has resulted in direct and indirect impacts to wild bison and foraging activity that sustains them (**Bjornlie and Garrott 2001; Gates et al. 2005**).

Existing state and federal regulations, and the framework for the Interagency Bison Management Plan poses a serious threat to bison's evolutionary potential.

In Montana, Yellowstone bison fall under the authority of the Montana Department of Livestock ([MCA 81-2-120](#)), an agency with an institutional bias against wild, free-roaming bison that exists to promote the cattle industry.

Since the mid-1980's agents from Montana's cattle industry and the federal government have slaughtered over 6,600 wild bison migrating from Yellowstone National Park ([Interagency Bison Management Plan](#)) to habitats on the Gallatin National Forest putting the survival of the last wild American bison at risk.

The implications of this ongoing slaughter on bison genetic health and fitness in a population with distinct breeding groups are poorly understood.

Gross et al, Gross and Wang (2006) believe a minimum bison population of 2,000 is required (subject to non-random mortality and no immigration) to retain 95% of genetic diversity over time.

The National Park Service (2008) recently assessed bison genetic health and wrote:

“Increased loss of genetic diversity can also occur due to non-random mating, large variations in population size, skewed sex ratios, and non-random removals of animals. The ratio of mature bulls to adult females in the Yellowstone population and evident active competition between bulls for mates should preclude heightened concern about non-random mating effects (i.e., only a few bulls siring most calves).

Since 2000, the Yellowstone bison population has varied between ~2,500 – 5,000, with removal of ~1,000 bison during winter 2005-06 (20% of extant population) and ~1,700 bison during winter 2007-08 (36% of extant population). Large-scale management removals likely remove a disproportionate level of calf-mother pairs and reduce rates of genetic recombination through non-random harvest of bison from each breeding herd leading to higher probability of lost genetic diversity (Allendorf and Luikart 2007, Allendorf et al. 2008).”

Among its findings, the National Park Service wrote: “Evidence suggests that periodic large-scale removals are the most important negative impact to the genetic diversity of the Yellowstone bison population, and that the IBMP should be adaptively adjusted to incorporate multiple, relatively low to moderated levels of random and non-random mortality (e.g. predation, winter-kill, hunting, quarantine, brucellosis risk-management, etc.).”

Traill (2009) and colleagues found that populations of endangered species are unlikely to persist in the face of global climate change and habitat loss unless they number around 5000 mature individuals or more.

"Conservation biologists routinely underestimate or ignore the number of animals or plants required to prevent extinction," says lead author Dr. Lochran Traill, from the University of Adelaide's Environment Institute. (Online:

http://www.redorbit.com/news/science/1768708/conservation_targets_too_small_to_stop_extinction/)

"Often, they aim to maintain tens or hundreds of individuals, when thousands are actually needed. Our review found that populations smaller than about 5000 had unacceptably high extinction rates. This suggests that many targets for conservation recovery are simply too small to do much good in the long run."

Without viable habitat to sustain populations on the Gallatin National Forest, repeated, large-scale removal of wild bison in Yellowstone is ensured.

Loss of genetic diversity stemming from the near extinction of the species (**Boyd and Gates 2006**) coupled with extreme loss of historic bison range (**Hornaday 1889; Boyd 2003**), raises the risk of ecological extinction for wild bison (**Freese et al. 2007**).

The extensive prevalence of cattle genes in bison populations (**Polziehn et al. 1995; Ward et al. 1999; Halbert 2003**), habitat fragmentation, loss of natural habitats and isolated populations (**Boyd 2003**), limited range and population sizes, artificial selection, intensive management, unnatural confinement to fenced ranges, absence of predators, introduction of non-native disease (**Freese et al. 2007**) are some of the risk factors of ecological extinction for American bison that warrant action by the Gallatin National Forest to identify and manage habitat for viable populations.

Extirpation of bison from their native range is an indicator that the prairie ecosystem they played a part in forming is also at risk of extinction (**Knapp et al. 1999**): "Knowledge of the bison's role in tallgrass prairies is lacking because the extent of this grassland and the abundance of its dominant ungulate have declined dramatically and in tandem over the last 150 years."

The failure of the Gallatin National Forest to manage and identify habitat for viable wild bison populations has contributed to the ecologically extinct status of this iconic wildlife species in Montana.

In April 2000 The Montana Chapter of The Wildlife Society adopted a resolution in support of wild bison and restoring their ecological and

cultural role in Montana:

"Bison were a keystone species of the prairie ecosystem; significantly affecting the way the prairie grassland ecosystem evolved and playing an important role in maintaining it. Wild bison remain ecologically extinct in Montana. The State of Montana Department of Livestock has prevented the natural dispersal of wild bison into Montana from Yellowstone National Park because of disease issues while no attempts are underway to restore the species outside of this controversial region. Current management of private, state and Federal bison herds is leading towards domestication of bison that threatens their wild character and limits important natural selection processes." (Wildlife Society 2000)

The keystone ecological role of wild bison in their native habitat is poorly understood. Grazing by bison can reverse the loss of native grassland species and the disruption of grassland ecosystem structure and function caused by their extirpation (Collins et al. 1998).

Fallon (2009) reviewed the literature and found that the distribution and abundance of bison increases native plant and wildlife diversity, and bison grazing contributes beneficial nutrient cycling that aids plant growth and species distribution, and bison wallows create unique habitats beneficial to wetland species and contribute to drought and fire resistant plant composition. Fallon also identified bison as a significant food source for predators in the Yellowstone ecosystem "including birds, small mammals, gray wolves and grizzly bears." Bison carcasses fertilize soils.

For these reasons, BFC and WWP believes wild bison as a native grazer in the allotments is far more beneficial to the Gallatin National Forest than trucking cattle in/out and that the allotments should be permanently retired.

The District writes: "All of the Forest Plan Management Areas in the area of these allotments allow the grazing of livestock. While the Management Areas all permit grazing, they do not recommend specific livestock numbers, types of livestock, grazing seasons, or the types of grazing-related management activities to occur on each allotment. It is therefore the purpose of this proposal to decide those questions while providing the opportunity to graze livestock under permit as directed in the Forest Plan."

While the Forest Plan permits livestock grazing in the Hebgen basin it does not mandate or require it. In this instance, Buffalo Field Campaign and Western Watersheds Project contends that viability must be met first, and alternatively, that the keystone species American bison can help restore Forest resources damaged by cattle grazing.

The Gallatin National Forest and Montana Fish, Wildlife & Parks are currently reviewing “available Habitat Expansion Areas” for bison and this is a perfect time to look at managing habitat for viability of wild bison beyond the time and place constrictions of the Interagency Bison Management Plan as outlined in your memo:

“There is potential year-round habitat for bulls or mixed groups in the western bison management area on Horse Butte and the Flats east of the South Fork of the Madison.

A temporal expansion, to May 31 or beyond, of the bison tolerance date in the western bison management area, Zone 2, could provide additional late winter habitat.

Year-round bull habitat to the north of Duck Creek (south of Highway 287 and east of Highway 191) or (south of Grayling Creek) is potentially available.”

Viability for wild bison in Yellowstone cannot be achieved without providing habitat to support year round populations on the Gallatin National Forest.

Viability is one reason why we ask the Forest Service to conduct a suitability analysis of bison habitat on the Gallatin National Forest in the Hebgen basin at minimum in this scoping process, and take a hard look at habitats in the upper Gallatin, Gardiner basin, Cinnabar basin, migration corridors in the Yellowstone, Gallatin, and Madison river valleys, and Targhee Pass.

ALTERNATIVES TO BE CONSIDERED

Buffalo Field Campaign and Western Watersheds Project submit a no cattle grazing alternative to be considered in the environmental analysis and impact document. Again, while the Gallatin Forest Plan permits

livestock grazing in the Hebgen basin it does not mandate or require it. The habitat is more important to viability of indigenous species and should be managed for such species.

A no cattle grazing alternative would benefit recovery of resources damaged or harmed by the allotment and cumulative cattle grazing on Gallatin National Forest lands.

A no cattle grazing alternative would benefit habitat availability and recovery of threatened, endangered, and sensitive species that utilize the Gallatin National Forest.

A no cattle grazing alternative would also be consistent with the National Forest Management Act's population viability requirement for indigenous species including American bison that utilize Gallatin National Forest lands in Hebgen basin.

A no cattle grazing alternative would also be consistent with U.S. Forest Service duties under the Endangered Species Act (ESA) to conserve habitat that is important to individual endangered species by permanently retiring grazing allotments on the Gallatin National Forest:

“The Endangered Species Act imposes on federal agencies the obligation to “use all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this Act are no longer necessary” (Sections 2(c) and 3(3)). This obligation is comprised primarily of two components. The proactive component requires agencies to affirmatively carry out programs for the conservation of listed species (Section 7(a)(1)), and the Forest Service to establish a program to conserve fish, wildlife and plants, whether listed or not (Section 5(a)). The reactive component prohibits actions that would jeopardize the continued existence of a listed species or adversely modify its critical habitat (Section 7(a)(2)), and actions that would take any such species (Section 9(a)(1)) without a statement concerning incidental take (50 CFR 402.14(i)).” (Online: <http://www.fs.fed.us/r1/projects/aquatic-ecology/revision.shtml>)

Buffalo Field Campaign's and Western Watersheds Project's no cattle grazing alternative should include a complete analysis of the ecological

and economic costs and benefits of retiring these allotments, removing allotment infrastructure, and making the allotment permanently available as habitat for indigenous species.

PRELIMINARY SCOPING COMMENTS

Scoping comment: Forest Service renewal of cattle grazing allotments would make bison subject to shooting in the South Fork and Hebgen basin - suitable habitat for indigenous bison that inhabit the Gallatin National Forest. Scoping must include an analysis of cattle grazing allotment's impact, and the cumulative impact to wild bison resulting from the District's grazing allotment program, on the availability of habitat to bison migrating and occupying Gallatin National Forest lands in the Hebgen basin.

From the Interagency Bison Management Plan Partner Agencies Annual Report (July 1, 2008 through June 30, 2009) online:

<http://ibmp.info/library.php>

“ACTION 2.2A: USE SLAUGHTER ONLY WHEN NECESSARY; ATTEMPT TO USE OTHER RISK MANAGEMENT TOOLS FIRST.

Monitoring Metric 1: Annually document the number, age, sex, and sero-status of bison sent to slaughter (Lead =Animal and Plant Health Inspection Service [APHIS] with the MDOL).

Three bulls were captured and sent to slaughter because they could not be safely hazed out of a non-tolerance area north of Duck Creek. One bull bison was lethally removed from private land on the South Fork after co-mingling with livestock.

(emphasis added)

Adaptive Management Recommendations:

Continue evaluating opportunities and constraints for (1) transferring "surplus" bison to quarantine facilities for further surveillance and eventual release onto suitable restoration sites or to terminal destinations on tribal or other lands for periodic harvest for food or ceremonial purposes, and (2) adjusting conservation zones to increase state and treaty hunting opportunities in habitat outside the park.”

The District writes: “This proposal is being considered at this time because of the need to improve the conditions of several resources on the allotments and address any disparities between the Forest Plan standards and existing management and environmental conditions (Public Law 104-19, Section 504(a) (1994)).”

Scoping comment: Please identify and discuss any impaired resources caused by cattle grazing and disparities between Forest Plan standards and conditions on the ground.

The District writes: “The objectives for this proposal are:
Maintain all streams in proper functioning condition
Maintain and improve upland vegetative conditions
Provide for grazing opportunities as allowed for in the Gallatin National Forest Plan”

Scoping comment: Buffalo Field Campaign and Western Watersheds Project requests that the objectives be modified to include the indigenous species viability standard required by the National Forest Management Act.

Scoping comment: In light of public expenditures on these projects the Forest Service should produce and provide for public review a cost/benefit analysis of these permits and associated activities over the lifetime of said permits, including but not limited to: costs for the Forest Service personnel involved, direct costs of mitigations and amendments on allotments, i.e., fencing removal/construction, stream "hardening", cattle guard and stock tank installation and all associated costs.

A "no cattle grazing" alternative should be quantified in this analysis, including AUM fees collected for these permits and cost savings accrued to the Forest Service by permanently retiring these allotments.

In addition, a "no cattle grazing" alternative should disclose additional social and economic benefits from wildlife viewing, expanded hunting opportunities, and other direct localized benefits by permanently removing cattle grazing allotments in Hebgen basin. According to a study by the U.S. Fish & Wildlife Service (2008), wildlife viewing alone contributed \$376,451,000 in retail sales, 9,772 jobs, and nearly \$100,000,000 in local, state and federal revenues. Hunting also accounts

for a substantial component of local economic activity as a result of National Forests and state wildlife management areas being managed for native wildlife species.

Scoping comment: In reference to the Watkins creek allotment the Forest Service states in it's scoping document: "Only the lower section of Wally McClure stream is accessible to cattle, the rest of the stream is too steep and wooded". In light of previous extensive grazing throughout this allotment and given the vagaries of livestock movement over time, the Forest Service should provide tours to the public for viewing this allotment with attendant Forest Service personnel before and after allotment turn on-off dates. This would provide the public a chance to review conditions on the ground with resource people available for dialogue.

Scoping comment: As per FSM 2672.42 and 50 CFR 402.12 and 50 CFR 402.14 the Forest Service should provide the public an analysis of all native species utilizing the allotments that may be threatened, endangered, sensitive or proposed for listing, and disclose in particular impacts to each species habitat.

Scoping comment: In keeping with 50 CFR 402.02, the Forest Service should fully describe the existing environment within the Watkins and South Fork allotments, the amount and type of habitat for any affected native species, and specific characteristics of the area to be affected by the proposed action and provide such detailed information to the public in its environmental analysis and impact document.

Scoping comment: Please summarize the current status of native species populations and associated ecologies and habitat associations that exist within the project areas and in adjacent areas that could be affected by this decision. Include a cumulative impacts look at cattle grazing on any listed Endangered Species, sensitive or proposed species including but not limited to Sage Grouse, Westslope Cutthroat Trout, Bull Trout, Purple Monkeyflower and fully disclose this information to the public in its environmental analysis and impact document. Please included native species identified by the U.S. Forest Service Northern Region as sensitive, threatened, and endangered.

Scoping comment: In addition to the above and in keeping with FSM 2623, the Forest Service should describe in standard units of measure how much potential habitat exists for each native species identified above within or adjacent to the project areas. The Forest Service should provide this information to the public in its environmental analysis and impact document.

Scoping comment: In keeping with FSM 2672.42-3 the Forest Service should identify any threats or limiting factors that will affect native species and describe any actions within the project areas which may be detrimental to the public in its environmental analysis and impact document.

Scoping comment: Any analysis of the effects of the proposed action should include the effects on native migratory species including but not limited to Rocky Mountain elk, Moose, Mule Deer, Pronghorn Antelope, Trumpeter Swan, Osprey, and American Bison in particular as the allotment is within the historical range and identified as a migratory corridor for American Bison, a species of special concern (Gates et al. 2005).

Scoping comment: Any analysis of the effects of the proposed action should include the effects on native amphibian and reptile species. Please provide and disclose any herpetofauna population surveys, habitat analyses for amphibian and reptile species, and monitoring in your environmental analysis and impact document.

Scoping comment: Any analysis of the effects of the proposed action should include the effects, risks and threats to aquatic species and their habitats. Please provide and disclose any aquatic species population surveys, habitat analyses, and monitoring in your environmental analysis and impact document.

Scoping comment: As part of its environmental analysis and impact document, the Forest Service should provide for public review of the most current and comprehensive riparian monitoring protocols used on the Gallatin National Forest.

Scoping comment: We also wish to reiterate our opposition to the proposed Clean-up Amendment to the Gallatin National Forest Plan

rationale disregarding it's own directive to "provide habitat for viable populations of all indigenous wildlife species" and render it an obsolete part of a specific Forest Plan goal to achieve. This critical goal serves its purpose intended by the U.S. Congress to manage habitat for species viability, and it should be adhered to, and not administratively ignored through an amendment to an outdated Forest Plan.

REFERENCES

"Today, the plains bison is for all practical purposes ecologically extinct within its original range." - C.H. Freese et al, **Second chance for the plains bison**

"Current management of private, state and Federal bison herds is leading towards domestication of bison that threatens their wild character and limits important natural selection processes." - **Position Statement of the Montana Chapter of The Wildlife Society on Wild Bison in Montana**

"Yellowstone National Park is the only place in the lower 48 States where bison have existed in a wild state since prehistoric times. Bison occupied the region encompassing the park from shortly after recession of the last glaciers 10,000 to 12,000 years ago, until the 19th century when they came close to extirpation." - C. Cormack Gates et al, **The Ecology of Bison Movements and Distribution in and beyond Yellowstone National Park**

"The Bison of Yellowstone National Park are unique among bison herds in the United States, being descendants, in part, of the only continuously wild herd in this country." - Margaret Mary Meagher, **The Bison of Yellowstone National Park**

Buffalo Field Campaign and Western Watersheds Project fully incorporates by reference the following documents for the Gallatin National Forest's review and development of an environmental analysis and impact statement. A CD incorporating these references will be delivered or mailed to the Hebgen Lake Ranger District office.

1. Berger, Joel. 2004. The Last Mile: How to Sustain Long-Distance Migration in Mammals. *Conservation Biology* 18(2): 320-331.

2. BFC_Bison observations Hebgen Basin 2002-2009.
<http://wildlife.buffalofieldcampaign.org/>

Mapping systems, bison conservation articles and additional information on American bison is online:

<http://www.buffalofieldcampaign.org/habitat.html>

3. Bjornlie and Garrott_Effects of Winter Road Grooming on Bison in Yellowstone National Park.

4. Cannon_The Analysis of a Late Holocene Bison Skull from Fawn Creek, Lemhi County, Idaho, and Its Implications for Understanding the History and Ecology of Bison in the Intermountain West.

5. Cannon, Kenneth P. 2001. WHAT THE PAST CAN PROVIDE: CONTRIBUTION OF PREHISTORIC BISON STUDIES TO MODERN BISON MANAGEMENT. Great Plains Research 11(1): 145-174.

6. Fallon_The ecological importance of bison in mixed-grass prairie ecosystems.

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