



BUFFALO

FIELD CAMPAIGN

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Buffalo Field Campaign comments on the East Paradise Range Allotment Management Plan

Dear District Ranger Alex Sienkiewicz,

Buffalo Field Campaign submits comments in support of the Yellowstone Ranger District choosing Alternative 1, and closing all commercial grazing of domestic cattle on the East Paradise Range of the Custer Gallatin National Forest.

Buffalo Field Campaign favors a decision to not re-issue any permits, and to provide proper legal notice to permittees closing commercial domestic cattle grazing in Suce Creek, Pine Creek, Elbow, Mill Creek, Sixmile North, and Sixmile South.

We strongly support the timely removal of public fencing and livestock watering systems, and directing the Yellowstone Ranger District's scarce resources to restoring native species, and addressing soil quality, stream and riparian habitat impairments in Sixmile Creek (non-functional), and North Fork Sixmile and Big Pine Creeks (functioning at risk). Environmental Assessment 2020 at 5.

Half of the cattle grazing allotments have been vacant for upwards of 20 years and only one of six has been subject to environmental analysis. Environmental Assessment 2020 at 4, 5.

The 20,900 acres of National Forest in the East Paradise Range of the Absaroka Beartooth mountain range is within the American bison's territory – range and habitat, historic and current.

"Protecting the Last Wild Bison"

“The bison that inhabited the Yellowstone River valley immediately north of the park were exterminated during the 1860s; those on the park’s northern range were gone by the early 1890s.” Meagher 1989 at 670.

“The Lamar Valley and the Yellowstone River Valley north to Livingston was an important area for bison and Native peoples throughout Holocene prehistory. This system can be considered the original Northern Range of Yellowstone bison.” Gates et al., 2005 at vi.

Indigenous bison have occupied the region since recession of the glaciers 10,000 to 12,000 years ago, and the Yellowstone ecosystem is the only place in the lower 48 States where the migratory species has persisted in a wild state since prehistoric times. Gates et al., 2005 at vi, 76.

“Prehistoric bison distribution . . . can perhaps best be summarized simply by saying that bison appear to have been living everywhere in Greater Yellowstone where habitats were suitable.” Schullery & Whittlesey 2006 (an “exhaustive review” of the written historical record of settlers) at 136, 135.

At minimum, migratory bison have lost 85% of their territory in the headwaters of the Yellowstone and Madison river valleys. Plumb et al., 2009 (an “approximation of pre-settlement distribution based on archived reports and journals of expeditions through the area”) at 2377, 2378.

Human developments have destroyed all 14 migration corridors for American bison in the Yellowstone ecosystem. Berger 2004 at 322.

There is no self-sustaining population of wild plains bison across 145 million acres of National Forest habitat in the Western Region. U.S. Forest Service Warren 2011; U.S. Forest Service 2015.

American bison are near threatened with few populations functioning as wild in North America. Aune et al., 2018 at 1.

Within their native range, American bison are regionally extinct in 40 States, and possibly extinct in Texas. Aune et al., 2018 at 2–3.

Nature Serve’s state ranking for American bison is S2 at “risk because of very limited and/or potentially declining population numbers, range and/or habitat, making it vulnerable to extirpation in the state” of Montana. Montana Natural Heritage Program 2020 at 6.

Only 1% of American bison’s breeding range in Montana remains to perpetuate self-sustaining populations of the migratory species in the wild. Montana Natural Heritage Program 2020 at 6.

The Custer Gallatin National Forest hosts the remnant range and habitat for the only intact, migratory population of wild American bison in the state of Montana.

American bison are attempting to reestablish a migration corridor to Paradise valley. Recent observations have recorded natural migrations of American bison through Gardiner Basin, Tom Miner Basin, and Dome Mountain. Migration is an essential life-history strategy for American bison allowing for adaptation in a rapidly changing environment and evolutionary resilience in a climate that is being disrupted on global, regional, and local scales as a result of fossil fuel pollution.

National Forest habitat is indispensable in providing for viable populations of migratory bison, and viability for all indigenous species must be evaluated in your decision.

The Yellowstone Ranger District's analysis is inadequate because the agency did not evaluate how renewing cattle grazing allotments in the American bison's territory adversely affects the migratory species' range, habitat, and viability on the Custer Gallatin National Forest.

In Management Area 12, the Custer Gallatin National Forest must follow several standards:

“Schedule vegetation management practices, such as prescribed fire, to maintain or improve the quality and quantity of wildlife habitat.”

“On big game winter range, meet big game forage needs before making forage allocations to livestock.”

Gallatin National Forest 1987 (Forest Plan Standards) at III-37.

The Yellowstone Ranger District must also abide by forest management direction goals and objectives for all indigenous species.

“Provide habitat for viable populations of all indigenous wildlife species and for increasing populations of big game animals.” Gallatin National Forest 1987 (Forest Plan Goal) at II-1.

“Management of wildlife habitat will emphasize forage and cover needs on big game winter range.” Gallatin National Forest 1987 (Forest Plan Objective) at II-3.

The Yellowstone Ranger District's conclusion of “no impact” and “no meaningful effects to species or habitat” for American bison is flawed and inadequate. Environmental Assessment 2020 at 37.

“Cattle are permitted on Forest Service grazing allotments within the bison management zones.”

“The restrictions on the seasonal use of the management area by bison (requiring hazing back into the park by May 1) and the lack of special overlap

between cattle and bison prevent brucellosis transfer to cattle within the allotment once cattle are turned out.”

[Because of the foregoing,] “competition for forage and disease transmission were dismissed from further detailed analysis.”

Draft Terrestrial Wildlife Report and Biological Evaluation 2020 at 29.

“Bison competition for forage and spatial competition with big game species were dismissed from further detailed analysis.” Draft Terrestrial Wildlife Report and Biological Evaluation 2020 at 34, 44, 55; Environmental Assessment 2020 at 24.

The Yellowstone Ranger District errors in not evaluating Zones excluding American bison from their territory while permitting cattle to occupy and degrade the migratory species’ National Forest range and habitat.

The Hebgen Lake Ranger District evaluated effects to American bison in reviewing the South Fork & Watkins Creek cattle grazing allotments in the bison’s National Forest range and habitat. U.S. Forest Service Swilling 2011 entire. The Yellowstone Ranger District is required to do the same biological analysis for cattle grazing allotments in the East Paradise Range.

The Yellowstone Ranger District’s evaluation of American bison is outdated and your analysis is lacking an evaluation of direct, indirect, and cumulative effects.

The Yellowstone Ranger District’s analysis is faulty because the agency did not evaluate connected management actions on the Custer Gallatin National Forest that taken together, cumulatively and adversely affect American bison viability including the decision before you to approve or close cattle grazing in the indigenous species’ territory.

Cumulative stressors curtailing the natural range of migratory bison, fragmented habitat, government permitted actions disrupting connectivity to habitat, cattle grazing allotments, fencing schemes in migration corridors, and the uncertainty of rapid climate change, extended drought, and large-scale fires in shifting bison range into intolerant “management zones” raise substantial concerns about the viability of American bison on the Custer Gallatin National Forest.

The Custer Gallatin National Forest cannot continue to ignore evaluating how the agency’s permitting programs are cumulatively and adversely affecting the viability of American bison.

We have repeatedly raised substantial concerns with the Forest Service on how National Forest management actions are adversely impacting bison genetic diversity and viability.

In renewing cattle grazing within the bison’s territory, more of the Custer Gallatin National Forest range and habitat for American bison will be adversely affected. These

environmental effects were not analyzed, and are not available for the public to comment on.

The Yellowstone Ranger District must evaluate viability of American bison in conjunction with the Zone 3 boundary agreed to by Forest Supervisor Mary C. Erickson because these connected management actions are within the U.S. Forest Service's jurisdiction.

One of nine objectives of the Interagency Bison Management Plan agreed to by the Custer Gallatin is the Zone 3 boundary "beyond which bison will not be tolerated," excluding indigenous bison from substantial portions of their National Forest range and habitat. Operating Procedures for the Interagency Bison Management Plan 2019 at 2.

Agreeing to a boundary beyond which American bison will not be tolerated while permitting cattle grazing in the migratory species' territory is a direct, indirect, and cumulative effect left unexamined in the Yellowstone Ranger District's analysis.

The management and zone boundary scheme agreed to by the Custer Gallatin National Forest is not the best available scientific information, is outdated, operating on faulty assumptions, and cannot be relied upon for evaluating direct, indirect, and cumulative effects impacting the territory and viability of American bison. For example,

- Studying population viability was identified as a high priority in the Interagency Bison Management Plan in 2000. U.S. Dept. of the Interior & U.S. Dept. of Agriculture 2000 Vol. 1 at 731. Two decades later, this high priority scientific study to ensure the American bison population persists in the wild remains unfulfilled.
- After providing notice of its' intent to prepare a new Environmental Impact Statement in 2015, the State of Montana and Yellowstone National Park have failed to produce an updated scientific analysis on the impacts of its' bison management actions. National Park Service 80 Fed. Reg. 13603 (Mar. 16, 2015).

The Yellowstone Ranger District must evaluate viability of American bison in conjunction with the agency's permitted fencing schemes and cattle guards because these connected management actions are within the U.S. Forest Service's jurisdiction.

The fence installation will be more or less perpendicular to the river with the goal of preventing bison from moving further downstream. Gallatin National Forest 2011 at page 1 (approving 900 feet of jackleg fencing uphill from both sides of the Yellowstone River and associated gates and "cattle guards" on HWY 89 near Yankee Jim Canyon in Gardiner Basin).

[T]he Holder is authorized to construct and maintain a bison corridor fence Gallatin National Forest 2009 at page 1 (approving 695 feet of electrified fencing, associated cattle guards, and gates in Gardiner Basin).

The only identified effect to wildlife is to prevent bison from migrating further west, toward the Madison Valley, which is exactly the purpose of the fence. Custer Gallatin National Forest 2016 at page 3 (approving 30 feet of jackleg fencing, gate, and associated “Bison Cattle Guard” on HWY 287 in Hebgen Basin).

The Custer Gallatin’s permitted fencing schemes disrupt landscape linkages and habitat connectivity that is essential for maintaining bison diversity and viability on the National Forest.

Permitting zone boundaries, fencing, and cattle grazing cumulatively reduces and degrades American bison range and habitat and adversely impacts species viability on the National Forest, and viability must be evaluated for the public to comment on.

The Yellowstone Ranger District must evaluate viability of American bison in conjunction with permitting cattle grazing on Custer Gallatin National Forest habitat including, and in addition to, the East Paradise Range.

The East Paradise Range is one of several cattle grazing allotments permitted in the American bison’s territory on the National Forest. *See* Custer Gallatin National Forest Draft Permitted Livestock Grazing Report 2016 Figures D-6, D-7, D-8; Custer Gallatin National Forest Draft Terrestrial Wildlife Report 2016 Figure 16.

Permitting cattle grazing in the bison’s territory on the East Paradise Range is a long-term detriment to a valued indigenous species because in doing so the Yellowstone Ranger District puts bison in direct conflict with Montana’s regulatory scheme which has no provision for conserving the species in the wild. Mont. Code Ann. § 81-2-120 (2019).

Only Alternative 1 removes the regulatory conflict for American bison to access National Forest range and habitat.

The Custer Gallatin National Forest’s permitted actions – cattle grazing, fencing schemes, boundary/zone exclusions on the National Forest – must be evaluated as adverse conditions and impediments to the viability of American bison in the project area, and the National Forest.

In not examining these effects, the National Forest may be putting viability of American bison at risk because reducing migrants through over-killing or removing range contributes to habitat loss, population declines, shortens the distances migrants can travel, and can destroy mass migration and drive migratory species to extinction. Harris et al., 2009 at 68. The public doesn’t know and neither does the National Forest, because there is no cumulative effects analysis for American bison that takes into account the combined permitting decisions of the Custer Gallatin National Forest.

Continuing to permit cattle grazing in the American bison’s National Forest range and habitat is a direct, indirect, and cumulative effect left unexamined in the agency’s analysis.

The Yellowstone Ranger District must consider and evaluate direct, indirect, and cumulative effects impairing viability of American bison on the Custer Gallatin National Forest.

The Yellowstone Ranger District also did not evaluate loss of American bison's keystone and ecological roles on the National Forest vis-à-vis renewing cattle grazing in the East Paradise Range.

- See Tesky's 1995 U.S. Department of Agriculture study: forest fires play a role in maintaining sedge-grasslands, important winter habitat for bison; intense bison grazing of recently burned habitat may reduce fuel loads and function as firebreaks; the slaughter and near extinction of bison "may have shortened fire return intervals and increased fire severity during the early settlement period."
- See Geremia's 2019 study "bison engineer the green wave" improving forage quality 50–90% and extending spring "green up faster, more intensely and for a longer duration."
- "Without them, their ecosystem would change dramatically or could even cease to exist." McKeever 2020.

The ecological benefits American bison provide the ecosystem is consistent with Forest Plan standards, goals, and objectives to improve wildlife habitat, meet the forage needs of native species, and provide for viability of all indigenous species on the National Forest. Yet, bison's ecological benefits to the National Forest were not examined in your analysis.

Based on the foregoing facts, and for the following facts and reasons, Buffalo Field Campaign does not support Alternative 2, continuation of the East Paradise Range allotments, or Alternative 3.

Invasive grasses and noxious weeds have degraded Custer Gallatin National Forest habitat and soil quality conditions are not being met.

Noxious weeds are degrading over 1,697 acres of Custer Gallatin National Forest habitat on the East Paradise Range. Environmental Assessment 2020 at 29. "Noxious weeds are a particular concern in the Mill Creek allotment." Environmental Assessment 2020 at 17.

Expanding commercial domestic cattle grazing by 7,086 acres provides further justification for the Yellowstone Ranger District to evaluate impacts to American bison viability, range and habitat. Draft Terrestrial Wildlife Report and Biological Evaluation 2020 at 52–53.

The Yellowstone Ranger District implies cattle grazing will stem the invasion of timothy and Kentucky bluegrass and removing cattle would do nothing to stop these invasive grasses from spreading. Environmental Assessment 2020 at 22. However, other evidence in your analysis indicates the recovery of native species with no cattle grazing.

“Removal of livestock from the allotments would likely result in an increase of native vegetation and other herbaceous species, which provide competition for invasive species.”

Draft Vegetation Report 2020 at 3.

Lengthening the period cattle can graze, and doing so sooner, adding more fencing, cattle guards, and developing springs for watering depletes scarce Yellowstone Ranger District resources for maintaining viable populations of indigenous species. Environmental Assessment 2020 at 13, 20.

Whatever resources are available should be allocated to restoring desired ecological conditions and meeting standards for native species diversity, soils, riparian habitat and water quality. Management actions should favor seeding native grasses, and planting native riparian species. Environmental Assessment 2020 at 19.

The rationale and basis for the Yellowstone Ranger District designating “Forage Reserves” for cattle grazing as a result of “drought, wildfire, legal or other administrative concerns” is faulty and ignores forest plan standards, goals, and objectives for meeting the needs of native species. Environmental Assessment 2020 at 11–12, 26, 27, 34.

The Yellowstone Ranger District’s analysis did not evaluate how allocating National Forest habitat for domestic cattle in “Forage Reserves” would impact native species resilience to “drought, wildfire, legal or other administrative concerns,” and adverse disturbances affecting the diversity, persistence, and viability of indigenous species in the East Paradise Range.

Eliminating commercial cattle grazing in the East Paradise Range is the environmentally preferred alternative. Draft Terrestrial Wildlife Report and Biological Evaluation 2020 (summarizing environmental effects of the alternatives) at 63.

Permanently closing the East Paradise Range to commercial cattle grazing would benefit habitat for native migratory species and remove a potential source of conflict with threatened grizzly bears, gray wolves, and American bison resulting in dead bears, wolves, and bison. Environmental Assessment 2020 at 23.

A desired future condition of the National Forest is to design management practices that “favor the recovery of the threatened grizzly bear.” Gallatin National Forest 1987 (Forest Plan Desired Future Condition) at II–12.

“[L]ivestock grazing on public lands continues to be a leading source of conflicts between bears and humans.” Yellowstone Grizzly Coordinating Committee Habitat Modeling Team 2010 at 72 (citation omitted).

In a six-year period, 62 of 260 human-caused Yellowstone grizzly bears deaths involved management removals due to livestock depredation. Haroldson & Frey 2011-2017. Three additional cubs were also lost due to grizzly bear-livestock conflicts.

On National Forests, 30 of 62 human-caused grizzly bear deaths were due to conflicts with livestock. Haroldson & Frey 2011-2017.

Only Alternative 1 will not adversely affect threatened grizzly bears. Alternatives 2 and 3 are likely to adversely affect the bear. Draft Terrestrial Wildlife Report and Biological Evaluation 2020 at 41, 53.

American bison are an important grizzly bear food. Mattson 2017 at 17. Both indigenous species would benefit from Alternative 1 (no cattle) to prevent depredations resulting in dead bears and conflicts with the State of Montana resulting in dead bison.

Not permitting cattle removes a source of conflict and mortality for grizzly bears. Allowing American bison to roam and fulfill ecological roles in maintaining diversity of native species, including becoming food for grizzly bears, is a desired future condition.

For all of the foregoing reasons and evidence, Buffalo Field Campaign supports the Yellowstone Ranger District adopting the no action decision Alternative 1, and permanently closing the East Paradise Range to commercial cattle grazing.



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Sources

As part of Buffalo Field Campaign's public comments, an electronic copy of source material will be submitted via wetransfer.com from habitat@buffalofieldcampaign.org to comments-northern-gallatin@usda.gov and alex.sienkiewicz@usda.gov.

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About Buffalo Field Campaign

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

Buffalo Field Campaign's Hebgen Lake office is located near West Yellowstone, Gallatin County, Montana. Buffalo Field Campaign is supported by volunteers and citizens from Montana, Idaho, Wyoming, and around the world who come to visit the region, advocate for native wildlife and the ecosystems upon which they depend, and enjoy the natural wonders of our irreplaceable public trust lands and waters.

As an organization and on behalf of our members, Buffalo Field Campaign is deeply concerned and actively involved in protecting the only remaining descendants of indigenous buffalo to continuously occupy their territory in the United States.

Buffalo Field Campaign publicizes the plight of the buffalo, works to end their slaughter by government agencies, advocates for the enduring protection of viable populations of migratory buffalo and their freedom to roam.

Buffalo Field Campaign actively engages the American public to honor our natural heritage by allowing buffalo to exist as an indigenous wildlife species in their homelands.

Buffalo Field Campaign volunteers patrol habitat where buffalo migrate in the Yellowstone, Gallatin, and Madison river valleys, including the region's National Parks and National Forests. These direct experiences with buffalo in their territory inform our actions and strengthen our commitment for gaining permanent protections for the buffalo.