

From: [McCollister, Matthew](#)
To: [Bernardo Garza](#)
Subject: Fwd: nbr preliminary comment summary
Date: Monday, July 31, 2017 11:28:18 AM
Attachments: [Comment summary report.docx](#)

NBRC Comment Summary

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From: **McCollister, Matthew** <matthew_mccollister@fws.gov>
Date: Wed, Jul 12, 2017 at 1:40 PM
Subject: nbr preliminary comment summary
To: Kelly Hogan <kelly_hogan@fws.gov>

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Comment Summary for National Bison Range

1/2017-7/2017

On January 18, 2017 the USFWS published a NOI in the Federal Register. In this notice, it stated that the Service would begin a CCP process for the National Bison Range that would result in an Environmental Impact Statement analyzing 3 alternatives. The notice also specified a preferred alternative to transfer the NBR to the Confederation of alternatives. This notice, and the subsequent public scoping period that it opened, received comment from 57 entities. These letters and emailed comments were sent from 49 individuals and 8 organizations. The topics covered in these comments are summarized in the table below:

Count	Issue
47	Against transfer from FWS to CSKT
10	FWS is breaking policy, violating NEPA, restart CCP process
8	For transfer from FWS to CSKT
6	CCP should include goals for improving wildlife and habitat resources
4	A transfer is not precedent setting, should be clearly stated as such
3	CCP should include goals for reducing invasive species
3	CCP consider economic impacts and/or increasing public use opportunity
3	CCP should include goals for cultural resources
3	A transfer is precedent setting
1	FWS should improve funding/staffing
1	CCP should improve cooperation/CSKT involvement in refuge programs

On May 18, 2017 the Service published a second NOI revising the previous notice. This revision stated that a CCP process would begin with public scoping to develop alternatives. This change from a predetermined, preferred alternative was a result of earlier scoping efforts and a change in policy, according to the May NOI. Following this notice, FWS held 2 public meetings. On June 6 in Polson Montana, 12 members of the public attended and on Jun 7 in Kalispell 17 members of the public attended. Several attendees were affiliated with organizations and the press. Several individuals submitted written comments and signed up for the CCP mailing list. Overall, the May NOI scoping period has received comment from 18 entities; however, only 4 were new individuals and 4 were new organizations, the other 10 had already contributed comments earlier. The topics covered in these additional comments are summarized in the table below, repeated comments by the same entity were not counted twice:

Count	Issue
3	CCP should include goals for improving wildlife and habitat resources
3	FWS should improve funding/staffing
3	CCP consider economic impacts and/or increasing public use opportunity
2	Against transfer from FWS to CSKT
2	For transfer from FWS to CSKT
2	CCP's primary focus should be on how to manage, not who
2	CCP should improve cooperation/CSKT involvement in refuge programs
1	NBR should manage bison like wildlife, not livestock
1	CCP should include goals for reducing invasive species
1	A transfer is not precedent setting, should be clearly stated as such
1	FWS is breaking policy, violating NEPA, restart CCP process

Overall, most comments included opinion about CSKT involvement in the NBR. Commenters fell on both sides of that argument, and some opponents of CSKT involvement argued that a CCP should not address tribal involvement (via Annual Funding Agreement or other) at all. Overall, conservation organizations supported CSKT involvement and the transfer of NBR, with 9 in favor and 3 opposing.