IDAHO CHAPTER THE WILDLIFE SOCIETY c/o Dr. Charles E. Harris Idaho Department of Fish and Game P.O. Box 25 Boise, ID 83707



24 April 2000

Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator U.S. Fish and Wildlife Service University Hall, Room 309 Missoula, MT 59812

Dear Dr. Servheen:

The Wildlife Society is an international professional society established in 1937. The Society's membership of more than 9,600 includes research scientists, educators, communications specialists, resource manages, conservation law enforcement officers, administrators, and students in more than 60 countries. The principal objectives of The Wildlife Society are: (1) to develop and promote sound stewardship of wildlife resources and of the environments upon which wildlife and humans depend; (2) to undertake an active role in preventing human-induced environmental degradation; (3) to increase awareness and appreciation of wildlife values; and (4) to seek the highest standards in all activities of the wildlife profession.

The Idaho Chapter of The Wildlife Society (hereafter known as The Chapter) has a current membership of about 200. Chapter members include individuals employed by state and federal agencies, educational institutions, non-profit organizations, industry, and consultants, as well as retirees and graduate students.

The Chapter has reviewed the Final Environmental Impact Statement (FEIS) on Grizzly Bear Recovery in the Bitterroot Ecosystem, and we endorse Alternative 1 (Restoration of Grizzly Bears as a Nonessential Experimental Population with Citizen Management). The Chapter favors grizzly bear restoration in the Bitterroot Ecosystem, and for a number of reasons Alternative 1 appears to be the best way to achieve restoration. Since Alternative 1 was derived through cooperative efforts of a large number of organizations, agencies, and private interests it is far more likely to be successfully implemented in a reasonable time period and thus begin grizzly bear recovery in the Bitterroot Ecosystem.

We commend the Service for the extensive efforts in addressing the magnitude of comments received, conducting further analyses, and adjusting the proposal to address the concerns of the serious and thoughtful comments of recovery advocates and opponents alike. The concerns The Chapter raised in the Draft EIS appear to have been addressed in some fashion in the FEIS. Our primary concerns revolved around the Citizens Management Committee (CMC) and its lack of scientific guidance. By adding the scientific advisors, many shortcomings associated with the draft will likely be alleviated. Although we may still have some reservations regarding the ability of a CMC to make decisions with grizzly bear recovery as its primary goal, Alternative 1 and its unique attributes are worthy of a concerted effort involving the federal government, tribes, states and their citizens and is the only viable means to ensure public input and that will

garner long-term support for a reintroduction program.

The experimental non-essential designation under Alternative 1 acknowledges that grizzly bear reintroduction into the Bitterroot Ecosystem is an experiment. The EIS team made exhaustive studies of future grizzly bear population growth and size and habitat quality and quantity in the release area, but these studies are still professional best estimates. The released bears, through their behavior and spatial/temporal distribution, will show us things we may not have anticipated. Alternative 1 will allow the management flexibility necessary to adjust to new information based on grizzly bears actually using the recovery area.

The linkages and corridor research currently being conducted will hopefully address the problems associated with isolated populations. We recommend that this effort be fully incorporated into any recovery effort for the Bitterroot Ecosystem. The habitat analysis conducted by Waller and Boyce, Boyce's PVA, and contributing research conducted by scientists from the Craighead Institute, added credibility to the EIS's reliance on the wilderness as providing adequate habitat for a recovered population. Although habitat concerns may still exist, most notably salmon and whitebark pine declines, it is more apparent that whitebark pine and alternative foods do exist in quantities adequate enough to provide for a recovering grizzly bear population.

The Chapter feels there are two issues that will require some level of discussion by the Service prior to implementation of the Record of Decision. The first is adequate federal funding for the proposed recovery efforts. The second is how the newly established Governor's Office of Species Conservation will interact with the CMC, the Bitterroot Ecosystem Subcommittee, the IGBC, the state agencies, and the federal government.

As described on page 2-12 of the FEIS, the Secretary would be required to contact the Idaho Chapter as part of the process to obtain nominations for a scientific advisor from Idaho. The Chapter stands ready to participate in the process.

Sincerely,

Charles E. Harris, Ph.D. President