



**IDAHO CHAPTER OF THE WILDLIFE SOCIETY**

321 ADA STREET  
BOISE, ID 83702

17 August 2001

Assistant Regional Director  
Ecological Services  
U.S. Fish and Wildlife Service  
Box 25486  
Denver, CO 80225

RE: The Idaho Chapter of The Wildlife Society's comments on the Secretary of the Interior's plan to take no action to restore grizzly bears to the Bitterroot Ecosystem.

Dear Sir or Madam:

On behalf of the 200 members of the Idaho Chapter of The Wildlife Society (Chapter) I am writing to express our concerns regarding the 20 June 2001 proposal by Secretary of Interior Gale Norton to withdraw the existing Record of Decision (ROD) published by the U.S. Fish and Wildlife Service (Service) in November 2000 to reintroduce grizzly bears into the Bitterroot Ecosystem and replace it with a new ROD adopting the "No Action" alternative. The Chapter urges the Service to adopt and implement the November 2000 ROD to reintroduce grizzly bears into the BE of central Idaho and western Montana and to reject the "No Action" alternative.

The Wildlife Society is an international professional society established in 1937, with the Chapter being chartered in 1963. 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. 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.

In comments on the Final Environmental Impact statement for grizzly bear restoration in the Bitterroot Ecosystem, our Chapter supported grizzly bear restoration in the Bitterroot Ecosystem and the Service's preferred alternative to accomplish restoration. This preferred alternative was developed following more than 5 years of public meetings, a draft and final EIS, receipt and analysis of extensive comments from the public and professional organizations. The process leading to last year's ROD took 7 years, cost of more than \$700,000, was supported by the vast majority of public comments, and was supported by all of

the scientific organizations who commented during this period. The fact that Secretary Norton's decision to withdraw the existing ROD without participation by the Service's Grizzly Bear Recovery Coordinator, the Interagency Grizzly Bear Committee, or other scientists knowledgeable about grizzly bears and the grizzly bear recovery plan points to a politically motivated decision rather than one based upon scientific reevaluation of the decision and the best interests of grizzly bear recovery.

### **Legal Requirements**

The Service has legal requirements under the Endangered Species Act (ESA) to recover grizzly bears. The purposes of ESA are: "to provide a means whereby ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species, and to take such steps as may be appropriate to achieve the purposes of the treaties and conventions set forth in subsection (a) of this section". Conserve, conserving, and conservation are defined within the ESA as to use and the use of all methods and procedures that are necessary to bring any endangered or threatened species to a point at which the measures pursuant to the Act are no longer necessary.

The Bitterroot Ecosystem is a designated recovery area in the Grizzly Bear Recovery Plan because grizzly bears historically occurred there and the remote and vast area still provides excellent habitat and potential to recover a healthy population and significantly contribute to the recovery of the species. Since the time grizzly bears were listed for protection under the ESA in 1975, the Bitterroot Ecosystem was first identified as a potential recovery area and then designated as a recovery area in 1991 by the Interagency Grizzly Bear Committee. This designation was supported by historical grizzly bear presence and a contiguous block of over 16,000,000 acres of federally managed lands, containing more than 4 million acres of designated Wilderness, with sufficient habitat to support a recovered grizzly bear population (Scaggs 1979, Butterfield and Almack 1985, and Davis and Butterfield 1991).

The Grizzly Bear Recovery Plan, Bitterroot Chapter of the Recovery Plan, Final Environmental Impact Statement, Record of Decision, and Final Rule all conclude that recovery of a grizzly bear population in the Bitterroot Ecosystem will significantly increase long-term survival probabilities and conservation of grizzly bears, and is necessary to meet the objectives of the Grizzly Bear Recovery Plan – to recover grizzly bear in the conterminous 48 States as legally required by the ESA. These documents also conclude that grizzly bear recovery will require reintroduction of bears from other areas because natural recovery is highly unlikely given scientific data collected from 575 radio-collared grizzly bears over the last 25 years.

The Service states in the proposed ROD for the Grizzly Bear Recovery in the Bitterroot Ecosystem Environmental Impact Statement (EIS) that "establishment of an experimental population is a discretionary action". We believe this assertion is inaccurate. The volume of scientific data, analysis, and conclusions presented in the above-mentioned documents indicate the recovery of grizzly bears in the Bitterroot Ecosystem is not discretionary, given the statutory requirements of the ESA, and the congressional mandate of the Service to recover and conserve listed species and the ecosystems upon which they depend. Further, the proposal to select the No Action Alternative is inadequate to meet the Service's legal requirements under the ESA to recover grizzly bears in the lower 48 states. As stated above, all scientific conclusions reached by the Service thus far indicated recovery of grizzly bears in the Bitterroot Ecosystem is necessary, recovery will not occur naturally, and reintroduction will be required. The Service's final EIS on the Bitterroot concluded that up to 25 bears should be introduced as an experimental nonessential population with oversight by a citizens management committee.

As the professional society of wildlife biologists in the state of Idaho, we concur with the Service's conclusion and urge that the Secretary and the Service proceed with grizzly bear reintroduction and

recovery as defined by the Bitterroot FEIS, ROD, and Final Rule. Further, we believe that the Service and the Department of Interior abrogated their responsibilities under the ESA by submitting to the state of Idaho's demands for no grizzly reintroduction and recovery efforts in the Bitterroot Ecosystem. Further, without any significant new and additional information that contradicts the conclusions and decisions documented in the Recovery Plan, Bitterroot Chapter of the Recovery Plan, FEIS, ROD, and Final Rule, a decision to rescind the reintroduction effort is without scientific, social, or legal foundation.

There is also significant new scientific information that further supports the necessity and urgency of establishing a grizzly bear population in the Bitterroot Ecosystem. Genetic research conducted by Craig Miller and Dr. Lissette Waits of the University of Idaho indicates the Yellowstone grizzly bear population is genetically isolated and will likely suffer from inbreeding depression if there is no gene flow within the next 30 years (Miller et al., In Press). One of the management recommendations of their research is to establish a recovering grizzly bear population in the Bitterroots to provide potential for bear dispersal and genetic interchange with the Yellowstone grizzly population. Because Service documents estimate grizzly bear recovery in the Bitterroots will likely take 50-110 years, it is necessary to aggressively begin recovery efforts through immediate reintroduction, such that population numbers will support dispersing bears within the time frame required by the Yellowstone population to avoid inbreeding depression.

### **Public Support**

The majority of U.S. citizens surveyed (77%), and local Idaho and Montana citizens (62%), are supportive of grizzly bear reintroduction to the Bitterroot wilderness of Idaho (Duda and Young 1995). A subsequent survey in 1997 (Duda and Young 1998) produced similar results when respondents were asked if they would support reintroduction under Citizen Management: 62% of local Idaho and Montana residents supported reintroduction and 30% were opposed. Further, Service reports indicate approximately 75% of all public comments received throughout the NEPA process have been supportive of grizzly bear reintroduction in the Bitterroots. This strong public support certainly favors the Service moving forward with grizzly bear recovery and reintroduction in the Bitterroot Ecosystem.

Evidence of the flexibility of the ESA, Service managers, and grizzly bear recovery efforts has been provided throughout the 7-year process in developing the reintroduction plan. The reintroduced population would be designated as an experimental non-essential population. This would provide the necessary flexibility for wildlife and land managers to recover grizzly bears within a framework that allows for social and economic sensitivity during bear management. Further, a citizen management committee responsible for grizzly bear recovery and management would be authorized to implement and oversee grizzly bear recovery in the Bitterroots. The Secretary of the Interior, in consultation with Idaho and Montana governors and the Nez Perce Tribe, would appoint this 15-member committee. This alternative, selected for implementation in the ROD, is one of the best demonstrations of the flexibility of ESA, federal wildlife managers, and an effort to incorporate social and economic needs with the scientific and biological needs of species recovery. This approach truly represented an ecosystem recovery effort because it included consideration for the humans that would live and coexist with the grizzly bears in the Bitterroot Ecosystem. It is a shining example of the concept of "local control" that is a high priority of the Bush administration.

The Service also listened to and incorporated the Idaho Governor's and Idaho Fish and Game Commission's concerns into the FEIS and ROD. They addressed every concern short of stopping the reintroduction plan. The Draft EIS added alternatives, 2 additional habitat quality analyses were conducted (Hogg, Weaver, and Craighead 1999; Boyce and Waller 2000), and the recovery and analysis area boundaries were changed, as well as the special rule to address private citizen's, the Attorney General's, and the Governor's concerns.

It is unfortunate that the Governor of Idaho has chosen to oppose a scientifically based recovery action that enjoys broad public support. The State of Idaho could have taken a leadership role and demonstrated the flexibility of the ESA and an ideal citizen-based model to be used here and elsewhere for large, wide-ranging carnivore conservation as well as other contentious species. The Governor has instead misrepresented the threat and human safety issues posed by grizzly bears and the reintroduction project, played upon people's fears, and has done an injustice to truly understanding the grizzly bear and its place in Idaho's wilderness ecosystems. The Chapter believes it is inappropriate for the Department of the Interior to abandon its responsibility to recover listed species because of opposition from local political officials. Had the preference of state governors and legislatures been followed, the highly successful gray wolf recovery efforts in central Idaho and Yellowstone National Park would not have taken place. The Chapter supports involvement of local citizens and political officials in endangered species recovery planning and implementation, but they should not have ultimate veto power over recovery activities for federally listed species.

### **Budget**

The proposed ROD suggests that, due to the budget shortages, it is inappropriate to proceed with the Bitterroot recovery effort. There is little question that the project would be relatively expensive (given the inadequate budget allocated for endangered species recovery) and that there are many other demands on the Service's recovery efforts. However, an attempt to move the project forward using the citizens management committee and experimental nonessential status of the population may have provided alternative and less expensive ways for Bitterroot grizzly bear recovery to proceed. For example, Tribal and public management involvement and responsibility could have resulted in significant donations and financial support from private and non-government cooperators and foundations.

The Service has already invested significant amounts of time and money on the environmental analysis and studies leading to the FEIS and ROD. Unfortunately, it may now find itself spending more of its limited dollars in court to defend the effort to rescind the decision than what it might cost to implement grizzly bear recovery on the ground in Idaho.

### **Conclusion**

The Idaho Chapter of the Wildlife Society recommends proceeding with efforts to reestablish the grizzly bear in the Bitterroot Ecosystem under the preferred alternative in the FEIS. We believe Secretary Norton's proposal to withdraw this scientifically sound and comprehensive reintroduction plan and select the No Action alternative is both scientifically and legally flawed.

Thank you for consideration of our comments.

Sincerely,

Charles E. Harris, Ph.D.  
President

## Literature Cited

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