

10 August 2001

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

Dear US Fish and Wildlife Service:

The Wildlife Society appreciates the opportunity to provide comments on the proposed Record of Decision (ROD) that would enact the "no action" alternative described in the Final Environmental Impact Statement for Grizzly Bear Recovery in the Bitterroot Ecosystem. The Wildlife Society is the association of professional wildlife biologists and managers dedicated to excellence in wildlife stewardship through science and education.

The Wildlife Society was disappointed to learn of Interior Secretary Norton's proposed change in the existing ROD concerning this issue. As evident from the comments made by the Montana and Idaho Chapters of the Wildlife Society during the FEIS comment period, we strongly endorse the preferred alternative -- Restoration of Grizzly Bears as a Nonessential Experimental Population with Citizen Management. This document discusses the reasons for our opposition to the "no action" alternative suggested by Secretary Norton.

The Wildlife Society believes that the reintroduction of grizzly bears into the Selway-Bitterroot Wilderness area is integral to maintaining the viability of existing populations. Currently, there are only two viable grizzly bear populations in the contiguous 48 states. These populations are small and isolated from one another, making them vulnerable to extinction, and there is a lack of dispersal corridors connecting them due to human development and sprawl. The FEIS for grizzly recovery presented sound evidence that the addition of a population to the Bitterroot Ecosystem would provide a potential link between existing populations and increase the probability of movements between them.

Under the No Action Alternative (Natural Recovery) proposed by Secretary Norton, it is very unlikely that grizzly bears will disperse from currently occupied areas and successfully repopulate the Bitterroot Ecosystem. More likely, grizzly bears will disperse to the areas closest to their currently occupied territory, which are heavily used for management and recreation. For this reason, it is essential that wildlife managers aid existing populations by undertaking the restoration of grizzly bears into the Bitterroots, where human activity is minimal.

For the reasons explained below, Alternative 1, Restoration of Grizzly Bears as a Nonessential Experimental Population with Citizen Management, represents the best balance between the Fish

and Wildlife Service's goals and objectives and the public's concerns. We believe that the alternative thoroughly addresses all aspects of grizzly restoration and should not be withdrawn in favor of the No Action Alternative.

First, because Alternative 1 is the result of a cooperative effort by conservation organizations, agencies and private interests, grizzly recovery in the Bitterroot Ecosystem is likely to be highly successful. The plan included an unprecedented effort to accommodate local concerns about the impacts of grizzly restoration. Polls done in Idaho show that a majority of citizens supports grizzly bear restoration as long as it is managed. In addition, Montana Governor Racicot supports restoration, as Montana citizens have learned to live successfully with the grizzly bear populations that currently occupy their state.

Second, this alternative designates grizzlies as a "nonessential experimental population", which allows wildlife managers increased flexibility to 1) respond to citizen concerns and 2) adjust grizzly bear management based on information gathered by monitoring the bears using the recovery area.

Third, the preferred alternative mandates the formation of a Citizen Management Committee, to be composed of federal and tribal representatives and nominees by the Governors of Idaho and Montana. Directing such a committee to oversee recovery efforts will increase public acceptance by ensuring that the public has a voice in management actions. In addition, the scientific community will support committee decisions due to the incorporation of scientific advisors and the requirement that a scientific review panel evaluate the committee's performance.

Fourth, Alternative 1 was formulated following studies of the proposed recovery area. The data from these studies support the conclusion that the Bitterroot Ecosystem will provide adequate habitat, including ample forage, for a recovering grizzly bear population. The presence of adequate habitat indicates there will be fewer human interactions, which will in turn lead to greater public acceptance of grizzly recovery. In addition, research shows that the best bear habitat coincides with the wilderness areas where the least amount of human-bear conflict occurs.

Finally, Alternative 1 in the FEIS for Grizzly Bear Recovery fully addresses human safety concerns. In addition to extensive studies documenting the potential risk of grizzly bears to humans, a number of provisions in the preferred alternative empower the public against potential harm from grizzlies. First, allowances are made for shooting grizzly bears in self-defense, or for obtaining a permit to harass or kill grizzly bears that are attacking livestock. Second, public education programs are planned for schools, clubs and organizations to inform people about how to recreate safely in grizzly bear habitat. Third, the posting of warning signs in grizzly bear populated areas is mandated. Fourth, Alternative 1 designates private lands in the Bitterroot Valley as exclusion zones, where any grizzly bear can be captured immediately and relocated or destroyed.

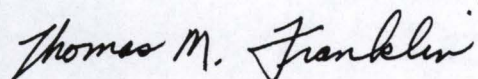
Secretary Norton's decision to withdraw this well researched and comprehensive reintroduction plan has no sound basis. The stated concerns about the safety of inhabitants in or near the Bitterroot ecosystem are insufficient to justify the proposed change in policy. Nowhere in the

Endangered Species Act is federal inattention to listed species mandated by safety considerations. Also, the recovery efforts of existing populations would actually be helped rather than hindered by the reintroduction of grizzlies into the Bitterroot Ecosystem, according to data presented in the FEIS. Finally, resources used for current recovery efforts would not be diverted to the Bitterroot reintroduction. Neither project would come at the expense of the other.

One of the most disturbing aspects of the proposed change in the existing Record of Decision is the fact that the decision was made without any federal, state or private scientific input. No scientist knowledgeable about grizzly bears or the grizzly bear recovery plan was consulted before this decision was reached. We believe that this is a breach of the Interior Secretary's responsibility to endangered species recovery.

We urge you to reject the proposed change in policy and reinstate Alternative 1, the preferred alternative for grizzly bear recovery, to ensure that healthy grizzly bear populations are restored in the lower 48 states as expected by the American people and required by the Endangered Species Act.

Sincerely,

A handwritten signature in cursive script that reads "Thomas M. Franklin".

Thomas M. Franklin
Wildlife Policy Director