

THE WILDLIFE SOCIETY

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, former 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.

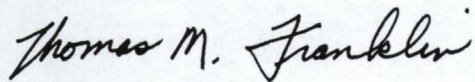
Secretary Norton's decision to withdraw this well researched and comprehensive reintroduction plan has no sound basis. The stated concerns about the safety of inhabitants in or near the Bitterroot ecosystem are insufficient to justify the proposed change in policy. Nowhere in the Endangered Species Act 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". The signature is written in dark ink and is positioned above the typed name.

Thomas M. Franklin
Wildlife Policy Director

SOCIETY FOR CONSERVATION BIOLOGY

July 22, 2001

Grizzly Bear Recovery Coordinator
US Fish and Wildlife Service
PO Box 5127
Missoula, MT 59806

RE: Comments on plan to take no action to restore grizzly bears to the Bitterroot Mountains

Dear Sirs:

The Society for Conservation Biology is a professional organization of 5200 members dedicated to promoting the scientific study of the phenomena that affect the maintenance, loss, and restoration of biological diversity. The Society's membership comprises a wide range of people interested in the conservation and study of biological diversity: resource managers, educators, government and private conservation workers, and students.

With this letter we urge the Secretary of Interior to implement the Record of Decision (ROD) adopted in November 2000 to restore grizzly bears to the Bitterroot Ecosystem of central Idaho and western Montana. We urge the Secretary to abandon the proposal to replace this ROD with a "no action" alternative that would leave this large area of suitable grizzly bear habitat in designated wilderness areas and adjacent national forests depauperate of grizzly bears, a dominate native carnivore.

The Selway-Bitterroot and Frank-Church-River-of-No-Return wilderness areas comprise a roadless grizzly bear recovery area of approximately 5,785 square miles (15,000 km²). These wilderness areas are surrounded by approximately 19,400 square miles (50,000 km²) of national forest land identified as an experimental population area for grizzly bears. Much of this experimental population area is also roadless and would be secure habitat for grizzly bears. Together, these areas comprise the Bitterroot Ecosystem (BE) where grizzly bears were exterminated early in the 20th Century. The habitat in the BE is estimated to be adequate to maintain a population of >250 grizzly bears, according to studies by Mark Boyce and colleagues included in the Final Environmental Impact Statement for the restoration proposal.

The BE is the largest area of secure grizzly bear habitat remaining in the lower 48 states that does not currently have grizzly bears. A restored population here would be, at least, the third largest population south of Canada (following the Northern Continental Divide Ecosystem [NCDE] and Greater Yellowstone Ecosystem [GYE] existing populations). It is also situated geographically in a key position to provide connectivity among currently isolated populations south of Canada. In the long term, movements of bears among these populations will be important for maintaining gene flow between these populations and with populations to the north in Canada and Alaska, which may have originally constituted a single metapopulation.

The BE is identified as a grizzly bear recovery area in the Fish and Wildlife Service's 1993 Recovery Plan. Restoration of grizzly bears to the BE is a crucial step that must be accomplished before serious consideration can be given to delisting the grizzly bear from federal protection under the Endangered Species Act. Delays in restoring this population are contrary to the Secretary of Interior's responsibility to conserve and recover listed species.

The Society for Conservation Biology finds the explanations offered in the "no action" proposal inadequate and unconvincing. The concerns over costs (\$2.1 million over 5 years) are insignificant, considering the importance of this conservation initiative and the size of the Interior's budget. We would

welcome increased emphasis and funds allocated to recovery of the existing populations, but have seen no proposal to do so and note that the final EIS specified that BE grizzly restoration would not use funds allocated for recovery efforts on existing populations. We also note that perhaps the single best action the Interior could take to benefit existing grizzly populations would be to restore grizzlies to the BE.

The concerns over public safety from a restored grizzly population in the BE are also overplayed. In similar habitat in Montana's Bob Marshall Wilderness area, from which bears were never exterminated, there has not been a human fatality from a grizzly bear attack since 1959, and the EIS estimates the likelihood of a human fatality following full recovery in the BE at perhaps 1 every 2-3 decades. This contrasts with the highest cause of preventable death to Idaho residents under age 75, which is illness derived from tobacco use, which killed 1,645 Idahoans in 1997. Public health concerns should be directed to significant problems rather than the exceedingly small possibility of death or injury from a grizzly bear attack.

The opposition to the grizzly restoration effort from the Governor of Idaho is unfortunate. Regardless, the Society for Conservation Biology believes that it is inappropriate for the Department of Interior to abandon its responsibility to recover listed species because of opposition from local officials. If the preferences of state officials had been followed, there would have been no restoration of wolves to the BE or GYE in 1995 and no restoration of wild populations of black-footed ferrets. The Endangered Species Act was enacted because Congress recognized the importance of maintaining biodiversity and of restoring declining species. Such goals cannot be accomplished without federal action because the pressure of local interests makes it impossible to address adequately the needs of declining species. Although involvement of local officials in recovery efforts is certainly valid, giving such officials veto power over recovery efforts for federally listed species is not. Such a policy has dangerous implications for all listed and declining species.

The original EIS and ROD for grizzly restoration in the BE provided an unprecedented level of involvement of local authorities and residents in the management of the reintroduced grizzly population. This local involvement was a potentially valuable new model for implementing recovery efforts for such locally controversial species as grizzly bears. We regret that the Secretary of Interior and the Governor of Idaho, who have long advocated more locally-friendly approaches to implementing species recovery efforts, are not allowing this new model to be tested and, if successful, applied elsewhere to help make recovery efforts more effective and less confrontational.

Thank you for considering these comments.

Sincerely,

Reed F. Noss, Ph.D.
President

IDAHO CHAPTER, THE WILDLIFE SOCIETY

August 1, 2001

Grizzly Bear Recovery Coordinator
U.S. Fish and Wildlife Service
P.O. Box 5127
Missoula, MT 59806

RE: Bitterroot grizzly bear recovery

Dear Sir:

On behalf of the 200 members of the Idaho Chapter of The Wildlife Society, I am writing to express our concerns regarding the 20 June 2001 proposal by Secretary of Interior Gale Norton to abandon the plan adopted by the U.S. Fish and Wildlife Service (Service) in November 2000 to reintroduce grizzly bears into the Bitterroot Recovery Area in favor of a "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.

It is clear that the proposal to discontinue grizzly recovery efforts in the Bitterroots is a political decision, one that realizes our Chapter's worst professional perceptions about the subjugation of sound scientific evidence and management policy for political gains. The decision to discontinue this recovery project directly reverses a process for local control of environmental management decisions in lieu of political decisions and control outside the communities being affected.

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. Since the time grizzly bears were listed for protection under the ESA in 1975, the Bitterroot Ecosystem has been identified as a potential recovery area and was 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 that contain more than 4 million acres of designated Wilderness. As delineated, the area comprises sufficient habitat to support a recovered grizzly bear population (Scaggs 1979, Butterfield and Almack 1985, and Davis and Butterfield 1991, Boyce and Waller 2000).

The Service states in the proposed Record of Decision for the Grizzly Bear Recovery in the Bitterroot Ecosystem Environmental Impact Statement (EIS) that "establishment of an experimental population is a discretionary action". The Service's final EIS on the Bitterroot states that "**there is only a remote likelihood that recovery of grizzly bears in the BE would occur through natural recolonization.**" In order to recover bears in the Bitterroot, the Service 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 and ROD. 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 Bitterroots. Further, without any significant new and additional information, a decision to rescind the reintroduction effort is without scientific, social, or legal foundation.

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). This strong public support appears to favor grizzly recovery and grizzly reintroduction into the remote federal lands that comprise the Bitterroot Ecosystem.

Evidence of the flexibility of the ESA, Service managers, and grizzly bear recovery efforts has been provided throughout the long 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, the Citizen Management Committee 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 effort 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.

The Service also listened to and incorporated the Governor's and Idaho Fish and Game Commission's concerns. They addressed every concern short of stopping recovery reintroduction. 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.

Realizing large public support for the project within and outside Idaho, Idaho's Governor used the influence of his office to misrepresent the threat and safety issues posed by the reintroduction project. His characterization of grizzly bears as "ill tempered flesh eating carnivores" did nothing to address the real social, economic, management, and scientific questions, but only attempted to develop support for Idaho's political opposition to the project.

Budget

The proposed ROD also 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 expensive 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 ROD and FEIS. It may now find itself spending more of its limited dollars to defend the effort to rescind the decision in court than what it might cost to get grizzly bears 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.

Thank you for consideration given this request.

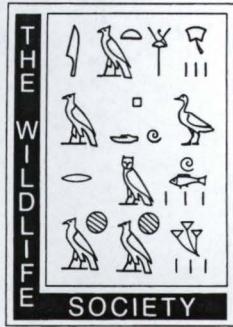
Sincerely,

Charles E. Harris, Ph.D.
President

Cc: Rod Sando, Director IDFG
Governor Dirk Kempthorne
Senator Larry Craig
Senator Mike Crapo
Representative Mike Simpson
Representative Butch Otter
Jim Caswell, Director Office of Species Conservation

Literature Cited

- Butterfield, B. and J. Almack. 1985. Evaluation of grizzly bear habitat in the Selway-Bitterroot Wilderness Area. Idaho Dept. of Fish and Game Project No. 104-78-719. Cooperative Fish and Wildlife Research Unit, Univ. of Idaho, Moscow, ID 66pp.
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- Scaggs, G.B. 1979. Vegetation description of potential grizzly bear habitat in the Selway-Bitterroot Wilderness area, Montana and Idaho. M.S. Thesis. Univ. of Montana, Missoula, MT 148pp.



**THE WILDLIFE SOCIETY
MONTANA CHAPTER**

Grizzly Bear Recovery Coordinator
August 8, 2001

Lewis Young, Past-President
1299 Highway 93 N.
Eureka, MT 59917
Phone (406) 296-2536
FAX: (406) 296-2588
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US Fish and Wildlife Service
PO Box 5127
Missoula, MT 59806
[email comment address: fw6_bitterroot@fws.gov]

RE: Comments on plan to take no action to restore grizzly bears to the Bitterroot Mountains

Dear Chris:

The Montana Chapter of The Wildlife Society previously submitted comments on the Final EIS for Grizzly Bear Restoration in the Bitterroot Ecosystem in favor of restoring grizzly bears to the Bitterroot Ecosystem. The Chapter's position has not changed and through this letter we urge the Secretary of Interior to implement the Record of Decision (ROD) adopted in November 2000 to restore grizzly bears to the Bitterroot Ecosystem of central Idaho and western Montana. We urge the Secretary to abandon the proposal to replace this ROD with a "no action" alternative that would leave this large area of suitable grizzly bear habitat in designated wilderness areas and adjacent national forests without grizzly bears.

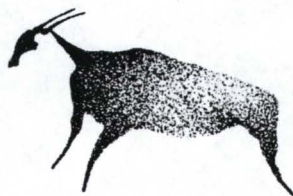
The Bitterroot Ecosystem is identified as a recovery area in the 1993 grizzly bear recovery plan. A decision to take no action on grizzly restoration in this area will delay the time when this species can be delisted and is contrary to the Secretary's responsibility under the ESA to recover listed species.

The Bitterroot Ecosystem is situated geographically in a key position to permit the movement of bears and grizzly bear genes among 4 of the 5 currently isolated populations south of Canada. The extremely small grizzly bear populations in northwestern Montana and northern Idaho (each with only 30-50 bears) have been found to be warranted to be listed as "endangered," although still listed as "threatened." These are the closest populations to the Bitterroots and their likelihood of persistence would be greatly enhanced by establishment of connections to a larger restored population in the Bitterroots.

The original EIS and ROD for grizzly restoration in the Bitterroot Ecosystem proposed a restoration plan that was unprecedented in the amount of authority and involvement provided to local citizens in the reintroduction area in the management of the restored grizzly population. It is especially unfortunate that the Secretary of Interior has rejected this plan that found significant agreement among people with disparate opinions about grizzly restoration. This local involvement was a potentially valuable new model for implementing recovery efforts for such locally controversial species as grizzly bears.

Thank you for considering our comments.

Lewis Young
Past President
Montana Chapter, The Wildlife Society



SPECIES SURVIVAL COMMISSION

Bear Specialist Group

C/O
 B.C. Ministry of Forests Research Branch
 RPO #3, Box 9158, Revelstoke, B.C.
 V0E 3K0
 Canada

August 8, 2001

Grizzly Bear Co-ordinator
 US Fish and Wildlife Service
 PO Box 5127
 Missoula, MT 59806

RE: Comments on Grizzly Bear Recovery in the Bitterroot Ecosystem

Dear Sir:

The Bear Specialists Group (BSG) is one of the specialists groups founded under the auspices of The World Conservation Union (IUCN). The BSG prepared and published the Bear Status Survey and Conservation Action Plan in 1999. The plan is the framework under which conservation and recovery efforts for the world's 8 species of bears will be conducted. One chapter in this plan deals with grizzly bear recovery in the lower 48 states of United States and this chapter identifies restoration of grizzly bears in the Bitterroot ecosystem as an important component of US grizzly bear recovery efforts.

Correspondingly, the BSG is very disappointed in the recent decision of Secretary of Interior Gale Norton, to abandon the previously adopted plan to reintroduce grizzly bears to the Bitterroot area of Idaho. The United States is viewed as the world's leading nation in democracy, wealth and influence. We believe that the United States must also take a leading role in ecological conservation. Reintroducing grizzly bears into the Bitterroot Ecosystem would have set an important international standard for restoring and maintaining the integrity of ecosystems. We hope this opportunity is not lost and that the U.S. Fish and Wildlife Service will adopt and implement the Record of Decision published in the federal register in November 2000.

The stated reasons for abandoning the plan to reintroduce grizzly bears to the Bitterroot Ecosystem are unconvincing. The cost of \$2.1 million over 5 years (\$420,000/year) cannot be significant for a country with the enormous wealth of the United States. We note that grizzly (brown) bear reintroduction efforts have been taken in countries like Italy and Austria that have far fewer resources and where ecological conditions are less favourable for success than exist in the Bitterroot Ecosystem. Also, this species has been successfully re-establishing itself through natural dispersal throughout Scandinavia because of governmental actions that encourage its recovery. Certainly the United States should be able to do as much as these countries to restore this species which has been eliminated from 98% of its habitat south of Canada and is listed as "threatened" under the US Endangered Species Act.

The stated concerns over public safety are also unconvincing. Based on extrapolations from areas with similar conditions, the frequency of human deaths or injury from grizzly bear attacks from a recovered population in the Bitterroot will be extremely rare. Overall, there is an average of about 3 human deaths caused by bear attacks per year in all of North America from polar bears, black bears, and grizzly bears. In the Bob Marshall wilderness area of Montana, which is most similar to the wilderness areas in the Bitterroots, there has not been a human mortality from grizzly attack since 1959.

I urge you to reconsider the decision to abandon the proposed reintroduction of grizzly bears into the Bitterroot Ecosystem. The United States does not have to take a back seat to nations such as Sweden, Austria, Canada, and Italy when it comes to encouraging brown bears to repopulate areas of ecologically and socially appropriate habitat such as occurs in the Bitterroot Ecosystem.

Sincerely

Dr. Bruce N. McLellan
Deputy Chair
IUCN, Bear Specialist Group

INTERNATIONAL ASSOCIATION FOR BEAR RESEARCH AND MANAGEMENT



Harry V. Reynolds, President

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August 13, 2001

Grizzly Bear Recovery Coordinator
US Fish and Wildlife Service
PO Box 5127
Missoula, MT 59806

RE: Bitterroot Grizzly Reintroduction

Dear Fish and Wildlife Service:

The International Association for Bear Research and Management (IBA) strongly opposes the Secretary of Interior's recent proposal to negate a previous decision made under authority of the Endangered Species Act that would have benefited long-term health of threatened grizzly bear populations in the mountain west. The proposed action would replace the Record of Decision (ROD) adopted by the US Department of Interior in November 2000 to restore grizzly bears in the Bitterroot Ecosystem (BE) with a ROD specifying that "no action" will be taken. We urge the Secretary to reconsider, to reject the "no action" option and to proceed with implementation of the original ROD.

The IBA is an international professional society of scientists and managers dedicated to science-based conservation of bears. We have over 700 members from 43 countries working on all aspects of science and management of the world's 8 bear species. We hold periodic conferences in countries around the world and publish annually a volume of the peer-reviewed scientific journal, *Ursus*, recognized as the authoritative source for biological information on the world's bears and their conservation. Our members are well-qualified to speak on matters concerning bear biology and management, protection of human safety and property in areas occupied by bears, and reintroduction of bears of formerly occupied ranges.

All bear species have been significantly reduced in numbers and distribution due to expanding human population and developments. In North America, the grizzly bear once lived as far south as Mexico but now occupies less than 2% of its original range south of Canada. This is an unacceptably small percentage given that there are large areas of formerly occupied habitat that are both biologically and socially suitable locations for restoration efforts.

Of these currently unoccupied habitats, the wilderness areas in the Bitterroot Ecosystem are the most appropriate place to restore grizzly bears. This area is remote, is primarily designated wilderness, is sufficiently large and intact to support a viable population, and the potential for significant conflict with other uses such as livestock grazing is very small. The Selway-Bitterroot and adjacent Frank Church-River-of-No-Return Wilderness Areas together constitute 15,000 km² of designated wilderness surrounded by some 50,000 km² of national forest lands much of which is also suitable grizzly bear habitat. We are aware of nowhere in the world where there is a better opportunity to reestablish a significant population of grizzly bears.

Restoration of brown (grizzly) bears in Europe is now occurring in areas that are far less favorable than occur in the Bitterroot from the standpoint of amount of habitat and likelihood of significant conflicts with other uses. It should be the responsibility of the United States to set a good example to the rest of the world on restoring a depleted species like grizzly bears in an area where they were extirpated only 60 years ago. Elsewhere in the world, Italy,

Austria, Sweden, and Norway are actively undertaking restoration programs for brown bears in areas from which they were eliminated. Similarly, Spain and France are taking extraordinary measures to preserve small remnant populations of brown bears under conditions far less favorable than exist in the Bitterroot Mountains.

We acknowledge that the support of local citizens is a vitally important consideration in the restoration of species like grizzly bears that are frequently mischaracterized in the popular media as savage beasts likely to attack without notice or provocation. The ROD adopted last November recognized this and proposed a grizzly restoration plan that was unprecedented in the amount of authority and involvement provided to local citizens in the reintroduction area in the management of the restored grizzly population. This plan resulted in significant agreement among people with disparate opinions about grizzly restoration.

A restored grizzly bear population in the Bitterroot Ecosystem would be the third largest population south of Canada, following existing populations in the Northern Continental Divide Ecosystem and Yellowstone Ecosystem. It is situated geographically in a key position to permit the movement of bears and genetic interchange between 4 of the 5 currently isolated populations south of Canada. It is our opinion that the largest single step that could be taken to recovery grizzly bears south of Canada would be to reestablish another significant viable population in the Bitterroots.

The Bitterroot Ecosystem is identified as a recovery area in the 1993 grizzly bear recovery plan. Correspondingly, grizzly bears must be restored to this area before the species can be delisted under the Endangered Species Act. A decision to take no action on grizzly restoration in this area will delay the time when this species can be delisted and is contrary to the Secretary's responsibility under the ESA to recover listed species. Continuing and enhancing current recovery efforts in the other US grizzly bear populations is unquestionably important, but the gains toward overall grizzly bear recovery remaining to be made in these ecosystems are relatively small compared to the large gains that could be realized from a restored grizzly bear population in the Bitterroots.

The extremely small grizzly bear populations in northwestern Montana and northern Idaho (each with only 30-50 bears) have been found to be warranted to be listed as "endangered," although still listed as "threatened." These are the closest populations to the Bitterroots and their likelihood of persistence would be greatly enhanced by establishment of connections to a larger restored population in the Bitterroots.

Our strong opposition to the Secretary's proposed revocation is based on 7 tenets:

1. The previously passed ROD that provided for reintroductions would protect the integrity and long-term viability of threatened grizzly bear populations in the mountain West far better than the revocation and adoption of a "no action" alternative. Grizzly bears were eliminated from the Bitterroot Ecosystem by human actions by the late 1940's. Re-establishing the ecological diversity of the wilderness area and immediately adjacent federal lands by bringing back grizzly bears is simply the right thing to do.
2. Neither prioritization among recovery efforts nor funding priorities for recovery provide adequate reasons for revocation of the ROD. If the same reasoning proposed for revocation of the recovery program for the BE is followed to its logical conclusion, then recovery ROD's for other grizzly bear populations of lower priority for recovery or funding would also be considered for revocation. Certainly, the Department of Interior is not contemplating such actions, but neither should it do so with the Bitterroot ROD.
3. Both funding and recovery efforts for the reintroduction of grizzlies in the BE were designed to be separate from funding and recovery efforts for other grizzly bear populations, according to statements by the Department of Interior in the Final Environmental Impact Statement (FEIS: e.g., p. 5-20(4)). Furthermore, funds for state programs associated with the reintroduction would be provided to the states (FEIS, p. 5-50(4)). Therefore, funding and reprioritization among recovery plans should be a moot issue.
4. If the present ROD cannot be implemented because of funding appropriations and budgetary constraints, it should remain as an Endangered Species Act finding that awaits adequate funding. Similar decisions, contingent upon adequate funding and prioritization, occur with other listed species.
5. There is no evidence that any biological or social changes have occurred in the area that were not addressed in the Endangered Species Act assessment made in November, 2000. Therefore the previously passed ROD, made after a 5-year public process in which over 24,000 individuals provided input or participated in review and revision, should stand.

6. Safeguards for legitimate human safety concerns related to the reintroduction need to be an integral part of the programs but were adequately addressed in the ROD. There is no scientific basis for a call to re-examine the findings that human safety will carry any further risk than the assessed projection of 1 potential human fatality in the area every 20-30 years.
7. Funding for recovery of threatened grizzly bear populations in the region is presently inadequate and should be increased. This is a pressing need if recovery of threatened populations is to proceed. The implication that the USFWS is presently conducting and funding the 9 recovery activities listed in the Federal Register (p. 33620) needs clarification. Our inquiries to the Grizzly Bear Recovery Coordinator's office indicate that none of these activities have been funded as budget line items. Similarly, although examples are provided of recovery activities that may be given priority (Federal Register, p. 33624), none have been funded. In fact assigning priority to printing a conservation strategy for management of bears in the Yellowstone Ecosystem after delisting occurs seems premature since delisting has not yet been proposed.

If IBA can be of service in further deliberation of this issue, we are very willing in any scientific capacity.

We urge the Secretary of Interior to reject the proposal to take "no action" on grizzly restoration and to implement the November 2000 decision to restore grizzly bears to the Bitterroots.

Sincerely yours,

Harry Reynolds, President