

Date

Grizzly Bear Recovery Coordinator
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

Sirs:

The Society for Conservation Biology is a professional organization of xxx 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 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 continue to leave this large area of acceptable grizzly bear habitat in designated wilderness areas and adjacent national forests depauperate of grizzly bears, the dominate 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 grizzlies 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. Because of declines in the abundance of salmon in the headwaters of the Columbia, the BE will not

The BE is the largest area of secure grizzly bear habitat remaining in the lower 48 states that does not 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 Yellowstone Ecosystem [YE] existing populations). It is also situated geographically in a key position to provide connectivity between 4 of the 5 currently isolated populations south of Canada. A recovered population in the BE would be a key stepping stone in facilitating movements of bears between these 4 existing

populations. Such movements are important for maintaining gene flow between these populations and with populations to the north in Canada and Alaska that 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. We agree that this is an important recovery area. Restoration of grizzly bears to the BE is a key step that must be accomplished before serious consideration can be given to delisting the grizzly bears from federal protection under the Endangered Species Act. Delays in restoring this population are correspondingly contrary to the Secretary of Interior's responsibility to conserve and recover listed species like grizzly bears.

The SCB rejects as inadequate, not pertinent, or and unconvincing the explanations offered in the proposal to substitute "no action" for last year's ROD to restore grizzlies to the BE. The concerns over costs (\$2.1 million over 5 years) are insignificant from the perspective of a conservation initiative of this significance for a listed species and the size of 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 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 misplaced. In a similar habitat in Montana's Bob Marshall Wilderness area, from which bears were never exterminated, there hasn't be a fatal grizzly attack on a human since 1959 and the EIS estimates the likelihood of a human fatality following full recovery in the BE at perhaps 1 per 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. In that year inadequate diet and exercise killed 1,193 Idahoans and alcohol use killed 509 according to Idaho vital statistics. Public health concerns of public officials should be directed to these significant problems rather than the exceedingly small possibility of death or injury by grizzly bear attack.

The opposition to the grizzly restoration effort from the Governor of Idaho is unfortunate and misguided. Regardless, the SCB believes that it is inappropriate for the Secretary of Interior to abandon its responsibility to recovery listed species because of opposition from local officials, whether misguided or not. If the preferences of state officials had been followed, there would have been no restoration of wolves to the BE or YE 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. Commonly, this cannot be accomplished without federal action because the pressures of local interests and politics makes it impossible to adequately address the needs of declining species. Although it is important to involve local officials in recovery efforts, it is inappropriate to give such officials defacto veto power over recovery efforts for listed species. 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 locally controversial species like grizzly bears. The SCB regrets that the Secretary of Interior and the Governor of Idaho, who have long advocated for more locally-friendly approaches for implementing the species recovery efforts, have not allowed this new model to be tested and, if successful, utilized elsewhere to make federal recovery efforts more effective and less confrontational.

Thank you for consideration of these comments.