



"Preserving our natural resources FOR the public instead of FROM the public"
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RECEIVED BY U.S. FISH
 AND WILDLIFE SERVICE
 GRIZZLY BEAR RECOVERY
 COORDINATORS OFFICE.

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Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator
 Bitterroot Grizzly Bear EIS
 P.O. Box 5127
 Missoula, MT 59806

Dear Dr. Servheen:

The BlueRibbon Coalition is a nationwide organization representing 500,000 motorized recreationists, equestrians, and resource users. We work with land managers to provide recreation opportunities, preserve resources, and promote cooperation with other public land users. We have many members and member organizations concerned about the reintroduction of the grizzly bear in the Bitterroot Ecosystem. Following are our comments on the Draft Environmental Impact Statement (DEIS) for that reintroduction.

GENERAL COMMENTS

Alternative 1, Reintroduction of a non-essential experimental population, also appears as a proposed rule published in the Federal Register on July 2, 1997. Although selecting an alternative as preferred in a DEIS does not violate NEPA, publishing that alternative to the exclusion of others in the Federal Register gives it a special favored status. This action gives the distinct impression that a decision in favor of Alt. 1 has already been made.

The DEIS is written with the assumption that the public favors re-introduction, which is not the case. Suspect economic data is displayed that favors Alt. 1 and 4 (states a \$40-\$60 million in economic benefit), and none or a loss is displayed for the other alternatives.

ALTERNATIVE 1 - REINTRODUCTION, NON-ESSENTIAL, EXPERIMENTAL

1 Alt. 1 sets up a Citizens Management Committee (CMC) with 15 members, 5 from Montana and 7 from Idaho, with the remainder from federal agencies. Idaho has 74 percent of the recovery area, and Montana has less than 24 percent. This allocation proportionally favors Montana. The allocation should be changed to give Idaho more representation.

The Secretary of the Interior has sole authority. The CMC can be disbanded at any time by the Secretary if, in his opinion, the CMC is not meeting the recovery requirements of the grizzly bear. This makes the CMC merely a tool for Interior's

direction. Any changes deemed necessary in the CMC's management of the bear must go back to the public for comment and direction through the NEPA process.

The experimental population area (25,140 square miles) is too large for efficient management, and costs for the reintroduction maintenance (\$168,000 per year) are excessive for an indefinite period.

We question the economic benefit of reintroduction which is stated as \$40-\$60.6 million. Grizzly bears are not a tourist attraction. You have stated in many other venues that human-grizzly interaction is a detriment to both, and therefore have elsewhere eliminated human access. If anything, grizzlies should be considered a economic loss, not a benefit because of the potential loss of public land access.

A non-essential, experimental population, once introduced is shortly thereafter perceived as an endangered species with full ESA protection. This has occurred in the case of the wolf, where full consideration is given this population in matters of road and trail access and event permits.

ALTERNATIVE 2 - NO ACTION, NATURAL RECOVERY

This alternative is the least expensive and most effective way to assure grizzly bear recovery. It could be improved with the addition of the ESA 10(j) amendment. This would assure that resource use and public access could occur in concert with bear management.

ALTERNATIVE 3 - NO BEAR

It is my understanding that in order to be valid, all alternatives must comply with current laws. This alternative does not meet the legal mandates of the ESA and therefore should not have been included in the DEIS.

ALTERNATIVE #4 - REINTRODUCTION WITH FULL ESA PROTECTION

This alternative uses the grizzly bear as a means to exclude people from vast areas. It is ripped from the pages of environmental extremist tracts. It is less about the bear than it is about returning thousands of square miles into some imagined pristine wilderness where, if humans are allowed at all, they are closely controlled. It also makes it clear that management and monitoring of the bear in this vast area will be a significant federal expense.

We favor Alternative 2 - no action, natural recovery. We support the positions of the Governor of Idaho, Idaho Department of Fish and Game, and the Idaho Congressional Delegation. We urge that you abandon the expensive and contentious proposal to reintroduce grizzly bears to the Bitterroot ecosystem.

Sincerely,



Adena Cook, Public Lands Director

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