

## **Responses to Major Issues Raised About the Draft EIS During the Public Comment Period**

This section responds to the significant issues addressed by the public in their comments on the Draft Environmental Impact Statement (DEIS), “Grizzly Bear Recovery in the Bitterroot Ecosystem.” A detailed summary report and an executive summary report of 24,251 public comments were prepared and released to the public in April 1998 and this discussion follows the format in those documents (U.S. Fish and Wildlife Service, Summary of Public Comments on the Draft Environmental Impact Statement for Grizzly Bear Recovery in the Bitterroot Ecosystem, April 1998).

The major issues raised during public review of the Draft EIS are identified below. Responses are provided for each issue. Issues that were interrelated were grouped and discussed together. A few were actually parts or subissues of major issues and although comments were identified in each “subissue,” they were sometimes combined under one issue. Issues that received the most comments from respondents were: Recovery Area Boundaries; Bear Sources; Experimental Nonessential Population; ESA; Restrictions on Use of Public Lands; Local Control; Best Available Science; Grizzly Bear as a Missing Component of the Ecosystem; What is a Viable Grizzly Population; Population Corridor Linkages; Range Requirements of Grizzly; Effects to Grizzly (genetics, disease, bear safety, adequate food); Ecosystem Protection; Effects of Grizzlies on Human Health and Safety; Effects of Grizzlies on Livestock and Pets; Effects of Grizzlies on Big Game Species and Hunting Opportunities; Effects of Grizzlies on Recreational Opportunities and Public Access; Effects on Local Economy (jobs); Need for Education. The responses to issues in this section serve as a supplement to the discussions in Chapter 1 regarding issues. The USFWS found few instances where changes were required in its earlier discussions of the issues identified during public scoping.

### **THE DEIS (DRAFT ENVIRONMENTAL IMPACT STATEMENT)**

*1. Corrections to Facts and Data in the DEIS, and Questions Regarding the Data Used.*— A number of people questioned the data used throughout the DEIS. They made the general comment that the data is the basis for meeting the objectives of the reintroduction program. Many people questioned if the habitat in the BE (Bitterroot Ecosystem) can support a recovered grizzly bear population. Some people felt grizzly bears exist in the BE currently at a level the habitat can support. Some people commented the experimental nonessential designation would not be legal under 10(j) of the ESA because they question if the Selway Bitterroot ecosystem is geographically separated from other ecosystems such as the Cabinet/Yaak. The data presented in the Economic Analysis was disputed by people both for and against bear recovery.

There were many questions asked and comments made about specific items in the document, as well as suggestions for corrections or changes on specific pages. Because there were too many of these to include in this summary and they are too varied to summarize, the reader is referred to the Summary of Public Comments on the Draft Environmental Impact Statement for Grizzly Bear Recovery in the Bitterroot Ecosystem (USFWS 1998). The main categories under which the public questioned the data used in the DEIS include: legal aspects, language corrections, livestock and wildlife mortality, growth rate data, public opinion poll, timber management, road and trail management, human population density data, and economic analysis. A few popular comments to specific data are highlighted here.

*Issues from DEIS Comments and USFWS Responses: (The Draft EIS)*

“The DEIS incorrectly cites papers by Melquist (1985) and Groves (1987) as presenting conclusive evidence supportive of the USFWS position that there are no grizzly bears in the Bitterroot Recovery Area. Both papers contained sections on conclusions that at least a few grizzlies were likely to be inhabiting the area.”

“The 'moving windows' technique is the current best available science and must be used in the FEIS to accurately report road/trail densities. Second, some of the 'trails' are apparently open to motorized use but we are not told what percent of mi./sq.mi. As far as bears are concerned, these are 'roads' and need to be reported separately from hiking only trails. Third, high use trails have been shown to cause grizzlies to under-use habitat, yet we are not told if any of these exist, and if so where.”

“...adequacy and scientific basis of the cost-benefit analyses, Is there a more rigorous and defensible valuation methodology? ...use of the economic analysis endorsed by the Alliance for Wild Rockies is not defensible in this context.”

*Response.*— There are many questions asked and comments made about specific items in the document, as well as suggestions for corrections or changes on specific pages. The EIS Team reviewed the content analysis report, and where possible reviewed the original letters. Based on public comment, corrections were made to the FEIS, and additional analyses performed as appropriate.

**2. Comments on the NEPA Process and Public Involvement.**— Many people felt the DEIS violated NEPA, the National Environmental Policy Act, because it didn't offer a true range of alternatives including a “No Action” alternative. Conversely, some respondents stated the “No Action” alternative should not have been included in the DEIS because that action would be a direct violation of ESA. Respondents frequently called for a new DEIS and analysis. Some people believed more public hearings should have been held and others requested a state-wide referendum on the reintroduction. Some people commented that the public hearings were “rigged” because elected officials were allowed to speak first and were not subject to a random drawing. Several people were particularly critical of the Salmon hearing. Many people questioned whether their comments will count or make a difference, that the decision has already been made, and the FWS is not going to listen to local concerns. Several people claimed the public involvement process was not well publicized. They contend the effected people were not informed about the hearings nor were people coached on how to make official comments.

“We believe that the success of this endeavor hinges upon broad public acceptance of a method for bear recovery. The decision-making process should allow more time for an active public out-reach program that reaches down to county and local groups, elected officials, and concerned individuals...The proposed reintroduction schedule for the preferred alternative seems ambitious given the need to have the broader base of public support .... Adequate time should be added to the reintroduction schedule for this alternative.”

“The Draft EIS violates the National Environmental Policy Act. It does not include a full range of alternatives. In particular it does not include an alternative that will eliminate the conflicts between opposing groups regarding Grizzly bears and provide for the future of the Grizzly bear...The missing alternative would, based on the expanding populations of Grizzly bears in other Montana areas, delist the Grizzly bear, and reconstitute the management of the bear in the respective states. Allow Grizzly bears to reoccupy the Bitterroot ecosystem on their own volition, and as the habitat will support.”

*Response.*— The DEIS was prepared by an interagency interdisciplinary team that followed NEPA procedures. Every attempt was made to conduct a fair and unbiased analysis. Two additional alternatives

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have been added to the FEIS in response to public comment. Public involvement throughout the NEPA process has been extensive, as documented on page 5-9. Hearings on the DEIS were conducted in a manner and at selected locations to encourage public comment and give as many people as possible opportunity to comment. Hearings were well publicized in local media.

**3. Purpose and Need.**— People who questioned the *need* to reintroduce grizzly bears into the BE felt the grizzly is not endangered. The fact that there are many bears in Alaska and Canada confuses people as to why the bear is listed in the lower 48 states. People commented that there are bears in Yellowstone and in the Northern Continental Divide Ecosystem, so why should we reintroduce them into the BE? Many comments questioned why the preferred alternative proposes an ‘experimental non-essential’ population, if reintroduction of grizzlies into the BE is critical to their survival? Some people felt there is a population of grizzly bears currently in the BE and the USFWS should not play an active role in this population's expansion.

“There is nothing in the EIS that establishes that reintroduction of Grizzly bears into the Bitterroot ecosystem is essential for the maintenance of a healthy, viable Grizzly bear population, either in the lower 48 United States, in North America, or in the world. In fact the preferred alternative recommends that reintroduced grizzlies be established as, ‘experimental, non-essential’, meaning that the survival of this population of Grizzlies is not required to maintain the Grizzly as a species.

“The ‘Need for Action’ section on pages 1-4 and 1-5 should explicitly state that USFWS is not legally required to reintroduce grizzly bears in the BE. There is considerable confusion among constituent groups regarding whether introduction of an experimental non-essential species is a mandatory act. By creating the impression that USFWS is legally required to reintroduce grizzly bears into the BE, the DEIS offers the public a false choice.”

*Response.*— The experimental designation is supported by the USFWS because the restoration of grizzly bears into the Bitterroot would increase the probability of maintaining healthy grizzly populations south of Canada, but it is not essential to maintaining such healthy populations. A metapopulation analysis by Dr. Mark Boyce indicates there would be a significant reduction in the probability of extinction for grizzly bears in the United States with a restored Bitterroot population.

**4. Publication of the Proposed Rule in the Federal Register.**— Most of the comments regarding the publication of the Proposed Rule were critical. Most respondents felt it did not meet the design or intent of the Endangered Species Act and it circumvented the present protection given to grizzly bears. Some questioned whether it was legal to publish the preferred alternative and not the other alternatives because it appeared the decision had already been made. They also claimed this violated the intent of NEPA to present all alternatives in an equal fashion. They suggested numerous changes to the wording in the proposed rule.

“This leads one to conclude that the decision on which plan to implement has already been made, instead of the required NEPA process to determine the best alternative to choose. Only AFTER the record of decision has been signed, should comment be solicited on the proposed rule change.”

“Section 17.84(k)(12)(ii)(L) of the proposed rule specifies that” private lands outside the national forest boundary in the Bitterroot Valley are an area where any human/grizzly conflicts would be considered significant. Grizzly bear occupancy will be discouraged in these areas and grizzly bears will be captured and returned to the Recovery Area. This seems like a reasonable proposal for reducing the likelihood of

*Issues from DEIS Comments and USFWS Responses: (The Draft EIS)*

human/grizzly conflicts, but it also seems arbitrary and discriminatory not to authorize similar guidelines for private lands in Idaho. Why should private landowners in and adjacent to the Experimental Area in Idaho be treated any differently than private landowners in Montana?”

*Response.*— The NEPA process is being followed, and the proposed rule was written on the preferred alternative as identified in the DEIS. The FEIS has been modified to be responsive to public comments received on the DEIS and proposed rule. The Record of Decision will document the selection of an alternative and the rationale for its selection by the USFWS. If Alternative 1 is selected, the special rule will be finalized and will reflect the changes to FEIS Alternative 1. If the selected alternative is Alternative 1, then the implementation process will have been streamlined, saving taxpayer dollars. The FEIS has been modified to include a provision that any grizzly bear that occupies inhabited human settlement areas on private land within the Experimental Area that in the judgement of the management agencies/CMC presents a clear threat to human safety or where there is indication that it may become habituated to humans, may be relocated by management agencies. This is to prevent conflicts and possible bear-human injury or the death of bears, and to promote and enhance public safety.

**5. *Experimental, Non-essential Population Designation.***— A few individuals supported the experimental, non-essential designation as provided in Alternative 1 and published in the proposed special rule. They supported this designation primarily because it would allow more flexibility in dealing with human/bear conflict than would exist if the grizzly bears were listed as fully threatened under Endangered Species Act, and could better address unique local concerns. On the other hand, critics of this designation claimed it would provide no protection of habitat, while altering the status of the grizzly bears which would undermine the ESA. They also denounced this designation because there would be no linkages between this population and other populations in the Northern Rockies. Several respondents claimed there is evidence grizzly bears are already in the area and designation as experimental, non-essential must be denied. Some suggested the agencies are trying to justify the experimental, non-essential designation by artificially isolating the Bitterroot Ecosystem.

“A designation of nonessential and experimental will help appease people opposing the proposal and might also help limit human/bear conflicts...The grizzly bears in the Bob Marshall and the Cabinet Mountains seem to avoid people and are rarely a problem, as far as I'm aware. Historically, they have also been less protected and this seems to have fostered a healthy respect of humans.”

“...downgrading protected Yellowstone and Northern Continental Divide Grizzlies to an ‘experimental, non-essential’ population is dangerous. Not only will it threaten the populations the bears are taken from, but it also does nothing to protect the habitat in the area the bears are going to.”

*Response.*— Numerous public comments and positions of elected local, state, and federal government officials during the early scoping processes for the Bitterroot DEIS indicated they would repeatedly and fervently resist attempts to reintroduce grizzly bears without assurances that current uses of public and private lands would not be disrupted by recovery activities and that grizzly bears that attack livestock would be controlled. Such assurances can be made under nonessential experimental population designation.

The use of listed members of a species to create an experimental population of that species in a currently unoccupied area is what was intended by Congress in the amendments adding the 10(j) experimental population opportunity. Thus, experimental populations of California condors, blackfooted ferrets, and Mexican wolves have all used animals from listed populations as founders. Experimental status

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does not preclude linkage with other ecosystems, it requires that there be no population of the animal in question present, and that the area be geographically separated. The Bitterroot qualifies for experimental status for grizzly bears on both counts. If the Bitterroot is eventually linked to other existing populations, which is desirable and so stated in the Grizzly Bear Recovery Plan, such linkage may be in fact initiated by the members of the Bitterroot population expanding their range toward the closest population, the Cabinet-Yaak population, not the other way around.

**6. Consultation with the Fish & Wildlife Service.**— Most of the comments were critical of the Alternative 1 proposal to allow for resource extraction activities to continue without formal Section 7 consultation under Section 7(a)(2) of the Endangered Species Act. Many saw this as sacrificing habitat necessary to ensure the grizzly bears would survive (especially roadless areas). A few people responding to this issue said they supported the proposal to do away with the Section 7 consultation under the Endangered Species Act in order to continue resource extraction activities. They said it would give management agencies more flexibility and that formal consultation creates a negative impact on recreational use of the forests.

“The recovery program might, in the long term, be jeopardized by the cumulative habitat degradation which will occur due to the omission of Section 7 consultation by the U.S. Forest Service and other agencies.”

“..we underestimate what the negative impact Section 7 consultation can be on our use, recreational use of the forest.”

*Response.*— Under Alternative 1, formal Section 7 (a)(2) consultation will not be required, however, because nonessential experimental grizzly bears will be treated as a species proposed for listing, the conferencing requirements under section 7(a)(4) will apply. The nonessential experimental status without the requirements of ESA Section 7(a)(2) will lessen economic impacts on local communities, and increase the probability of a successful reintroduction of grizzly bears in the BE.

Also, numerous protections for insuring the success of the Bitterroot recovery effort have been included in FEIS Alternative 1. Under Alternative 1, existing Forest Plan standards and guidelines, as amended, will be deemed adequate pending review by the CMC. A primary task of the CMC is to assess the adequacy of existing management techniques, standards and guidelines, primarily through their reviews of grizzly bear mortalities. If the CMC deems such standards and guidelines inadequate for recovery of grizzly bears, the CMC may recommend changes to the U.S. Forest Service and other agencies and landowners. The CMC must make decisions and take actions that lead to grizzly bear recovery. If the Secretary determines their actions are not leading to recovery, he/she may resume lead management responsibility for the Bitterroot experimental population.

**7. Endangered Species Act.**— A few individuals applauded the Fish & Wildlife Service for their positive and significant breakthrough interpretation of the Endangered Species Act. Most of the comments, however, were extremely critical of what they saw as a misinterpretation of the ESA. Many questioned the legality of altering the protective status of the grizzly bears under the proposed action, and thought it would undermine the integrity and intent of the ESA. Several also observed that Section 10(j) contains no provisions to authorize the delegation of ESA responsibilities to a citizen committee. Supporters of Alternative 3 frequently called for de-listing the grizzly bears as they believe there are already plenty of grizzlies. Critics of Alternative 3 claimed it does not meet the legal mandates of the ESA and should not have been included in the DEIS. A great number of individuals who supported Alternative 4 said it was because it maintained full protection under the ESA for all grizzly bears.

*Issues from DEIS Comments and USFWS Responses: (The Draft EIS)*

“...the Endangered Species Act directs us to recover grizzly bear populations. However, it provides broad discretion in how management responsibilities are met, especially where experimental populations are designated. We sincerely believe that the Citizen Management Alternative best accommodates the recovery of a grizzly bear population while sustaining vibrant economies and allowing effective citizen participation.”

“The reduced level of protection under the Endangered Species Act will lead to a greater number of mortalities and more severe destruction of habitat, thereby jeopardizing the chances of successful reintroduction.”

*Response.*— The experimental designation is supported by the USFWS because the restoration of grizzly bears into the Bitterroot would increase the probability of maintaining healthy grizzly populations south of Canada, but it is not essential to maintaining such healthy populations. Bears in the experimental population in the Bitterroot would be fully protected against illegal killing under federal law under the ESA. Grizzly bears could only be killed in the Bitterroot in self defense or defense of others (as in all fully listed populations), or, in the special circumstance on private land where a depredating bear was unable to be captured by state or federal management officials, a permit could be issued to that landowner to kill that bear. Otherwise killing of bears in the experimental Bitterroot population is illegal and would be prosecuted under federal law. Also, an additional alternative to reintroduce grizzly bears as fully threatened to the BE has been added to the FEIS (Alternative 4A).

**8. Need to Revise Current Analysis, and Need for Research.**— Comments toward revising current analysis and suggested research topics were wide ranging and diverse. Several themes appeared: the economic analysis did not represent real dollars, the cost of the proposal was underestimated, and the losses to wildlife and livestock were underestimated. Other issues mentioned in lesser degrees were: what is the maximum number of bears that would be in the BE, genetic isolation from other bear populations, habitat suitability of the BE, the effect of a growing human population within the recovery zone, and logging in the Cove Mallard roadless area.

“The Grizzly Bear Recovery in the Bitterroot Ecosystem fails to note the off-highway vehicle use is also expected to have moderate growth to the year 2010. Last year, our off-highway motorbike/ATV registrations grew 18%. Our program recommends that the Fish and Wildlife Service use our new 1997 Idaho Comprehensive Outdoor Recreation and Tourism Plan for more up to date information in the final report.”

“In estimating predation on livestock and ungulates, it is indicated that a recovered population would kill up to 504 ungulates per year...Though not stated, in reading your rationale, one would have to assume these levels would not actually be attained until recovery was fully achieved, or approximately 100 years. It may help to clarify this aspect of the proposal.”

“...it's important for the service to take advantage of opportunities in 1998 to gather additional information on habitat quality, especially south of the Salmon River. We also urge the Service to incorporate the data on habitat quality in this area that have been developed by Dr. David Mattson.”

*Response.*— The EIS Team revised the analyses in the DEIS and conducted further research for inclusion in the FEIS. The economic analysis was revised and clarified (Chapter 4 and Appendix 17). A research project was contracted to an independent scientist to evaluate the habitat capability of the BE for grizzly bears, and to evaluate the contribution of a Bitterroot population to grizzly bear conservation in the lower 48 States (Appendix 21).

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**9. Additional Analysis Needed.**— Many individuals suggested additional analysis was needed. Those comments fall into the major categories; economic analysis, habitat analysis, human safety, delisting, relationship with other wildlife species, source bears. Other concerns raised less frequently included the effects of recovery activity on wilderness and wilderness values from motorized intrusions. Several people questioned the validity of the survey and economic analysis done by the USFWS stating they do not know of anyone contacted for such studies. People wanted a better explanation of how expected human injury/mortality and livestock losses were developed. People requested more information on how the Citizens Management Committee would operate, whether their actions would be subject to NEPA, and how internal conflicts would be resolved. Several people called for more analysis on the effects of recovery on recreation and hunting opportunities within the recovery area. One person felt the DEIS did not account for inflation and the real cost of goods and services over time with regards to the projected budgets. Another individual claimed the Grizzly bear DEIS needed to be integrated with the Upper Columbia River Basin DEIS.

“The DEIS is quite deficient on quantification of food supplies, indicating only that the appropriate vegetation types and known Grizzly Bear food plants are present in the BE. Vegetation types...should not be so used to predict wildlife habitat quality—only the possibility that a species might be present...the fact that Grizzly Bear foods are present says nothing about abundance and nutritional value, two topics for which the DEIS offers no information...”

“...The final EIS must include a comprehensive analysis of what effect grizzly bear recovery in the GSBE will have on other threatened and endangered species such as salmon and steelhead. In other words, a multiple species ecosystem approach should be taken that does not benefit one species while at the same time it increases the imperilment of other species.”

*Response.*— Dr. Mark Boyce completed a habitat-based population assessment of the BE, and it is included as Appendix 21(A, B) in the FEIS. This assessment indicates the habitat in the BE is capable of supporting a population of 308-321 grizzly bears. This number is 10-15% higher than the USFWS recovery goal estimate because further evaluation of the habitats in the southern portion of the Ecosystem indicate that even though the forb and berry production in these dry habitats is relatively low, the southern half of the Bitterroot Ecosystem contains substantial stands of whitebark pine as well as populations of elk and deer that can provide food for grizzly bears. Further, the remoteness of the area and the paucity of roads will help to ensure that a viable population of grizzly bears can persist in the Bitterroot Ecosystem of Idaho and Montana. Appendix 21D presents data on presence of a variety of grizzly bear foods in the BE. In summary, Appendix 21 provides the best scientific information available to indicate the habitats in the BE are capable of supporting a viable population of grizzly bears. Appendix 9B is the National Marine Fisheries Service Biological Opinion on the impacts to listed salmon and steelhead from the proposed recovery of grizzly bears in the BE. Finally, all the analyses in the FEIS, including the data used have been updated from the DEIS.

### MANAGEMENT STRATEGIES

**1. Strategies to Control Nuisance Grizzlies (Moving/Killing/Behavioral Conditioning).**— Comments on this issue were divided between those who want to see grizzly bears shot for harassing livestock and those who do not want to remove such bears. No one suggested any new techniques for handling bear conflicts. Several people were concerned about the additional burdens that nuisance bears would put on their livelihood. It was not clear to the public that the IGBC Nuisance Bear Guidelines exist and how these would effect bear management in the BE. Some people felt nuisance bears wouldn't be an issue if they were not

transplanted in the first place. Others commented on the appropriate time for a member of the public to shoot a bear. Some felt it should be allowed to protect one's property while others believed the only time to shoot a bear should be in defense of human life.

“If bears should get on anybody's property and damage it in any way, they should be shot and killed.”

“I think shooting a bear is only justified when your life is in danger.”

*Response.*— The IGBC Nuisance Bear Guidelines and their role in grizzly bear management have been clarified in the FEIS (Appendix 15). Alternative 1 also provides some additional management strategies for nuisance bears.

**2. *Illegal Killing of Grizzly Bears; Humane Treatment of Grizzlies; Effects to Grizzlies (Genetics, Disease, Colonization, Bear Safety, Adequate Food).***— These issues were analyzed together because the comments overlapped greatly. Few people commented on illegal killing directly. Some felt if grizzly bears were placed in the BE that the local people would shoot these bears advocating a “shoot, shovel and shut up” policy. Others emphasized the need for full protection under the ESA to reduce human mortality. Some people believed a grizzly bear should be able to be shot in defense of personal property. A few comments related to the treatment of the bears themselves. People felt the capture, handling and relocating of bears is cruel and inhumane.

A number of people thought the habitat base is not present in the Bitterroot Ecosystem to support a healthy grizzly bear population. Comments indicated concerns there are few berries, and reduced whitebark pine stands and salmon runs, and thus the bears would have no food. These people thought the bears would move to the valley floors in search of food and would run into conflicts with the local residents. Many people were concerned about the genetic isolation of a recovered bear population in the BE. They emphasized the importance of corridors to promote interchange between populations of bears.

“I am concerned the efforts to destroy bears by some of the public may negatively affect the recovery...”

“If whitebark pine is on the decline because of blister rust, and there are not as many fish as there once were, and huckleberries are an unreliable source of food for grizzlies, depending on the year, what is to keep the bears in their ‘Recovery Zone’ instead of in people's apple orchards.”

*Response.*— Bears in the experimental population in the Bitterroot would be fully protected against illegal killing under federal law under the ESA. Grizzly bears could only be killed in the Bitterroot in self defense or defense of others (as in all fully listed populations), or, in the special circumstance on private land where a depredating bear was unable to be captured by state or federal management officials, a permit could be issued to that landowner to kill that bear. Otherwise killing of bears in the experimental Bitterroot population is illegal and would be prosecuted under federal law. Capture and relocation of grizzly bears would be performed in a controlled fashion to reduce stress and impact to the bears. Habitat capability and presence of bear foods has been proven adequate to support a viable population of grizzly bears in the BE (Appendix 21).

**3. *Regulated Public Take of Grizzly Bears.***— Comments on this issue ranged from both ends of the spectrum. Some people felt it is imperative they have the ability to control a depredating bear immediately. People felt they would not be able to protect their life, a family member, friend, or livestock without criminal

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prosecution. Others felt that with too much freedom, locals that are fearful of the bear would kill them indiscriminately. Several people commented that excessive human-induced mortality is part of the reason the grizzly is gone from the Bitterroots. Several people advocated a hunting season on grizzly bears to make them afraid of humans. Some of the questions raised on this issue are already addressed in the IGBC Nuisance Bear Guidelines.

“I now (9 years) live near Gibbonsville ID on Hwy. 93 within the BE as it is drawn. I will protect my property (in your words-livestock in my words) even though you tell me I should call USFWS while a GB kills them.”

“I don't think the bears should be killed because of livestock being attacked. However, a compensation fund, from USFWS or a private organization like defenders of wildlife would help ease the minds of farmers and ranchers.”

*Response.*— Grizzly bears could only be killed in the Bitterroot in self defense or defense of others (as in all fully listed populations), or in the special circumstance on private land where a depredating bear was unable to be captured by state or federal management officials, a permit could be issued to that landowner to kill that bear. Otherwise killing of bears in the experimental Bitterroot population is illegal and would be prosecuted under federal law. It is possible that private organizations would develop a compensation fund similar to the fund established by the Defenders of Wildlife to compensate ranchers for livestock lost to gray wolf depredation.

**4. Compensation for Livestock Killed by Grizzlies.**— Most of the few comments on this issue supported the idea of compensating private stock owners for their losses caused by bears. One person felt that “someone grazing cattle on public land should not be paid for cows taken by a bear.” Several people suggested a compensation program similar to the one for the wolf reintroduction, and that the USFWS needs to be fiscally accountable for the program. They raised the question of who would pay if the funds were not donated to the groups who support compensation now, such as the Defenders of Wildlife.

“I do feel that, if such a fund is established, it should be included in the overall budget for reintroduction rather than depending on private donations as was done for wolf reintroduction.”

*Response.*— The USFWS does not have the authority to compensate ranchers for livestock lost to grizzly bear depredation. Any such compensation would have to come from other sources.

**5. Recovery Areas (Grizzlies traveling into Experimental Area); Recovery Areas (What are the actual boundaries of recovery areas); Recovery Areas (Where people want grizzlies); Recovery Time.**— The above issues have been combined into this summary because of their similar nature. Few people commented on bears traveling into an experimental area. Some people felt the recovery area needs to be increased to protect more habitat and increase the probability of grizzly bear recovery. Several people had questions about bears leaving the experimental area and how these bears would be managed if they conflict with humans.

A significant number of comments pertained to the size of the Recovery Zone. The majority of the people felt that the area needs to be increased and that the “boundaries of the recovery area are socially defined rather than biologically defined.” Many people felt that the size of the current proposed area would limit the probability of grizzly bear recovery. People did not like the recovery area for Alternative 1 and supported the area suggestions in Alternative 4. Only three comments stated that the recovery area is too

large and should be reduced.

People were divided about having bears in the Bitterroot Ecosystem. Some were adamantly opposed while others were just as strongly supportive of the reintroduction effort. Some people were concerned that there would be bears in their back yard. Others felt it would return the ecosystem to its natural order.

With respect to the time frame outlined for grizzly bear recovery, a small number of people commented. Most felt the ten year evaluation period for the project is too short. People noted that grizzlies have a low reproductive rate and it may take some time for the population to grow. Some people felt that the projected recovery time of 100 years is too long and would be a waste of tax dollars.

“We must maintain bear recovery ecosystems whose boundaries are defined based on habitat necessary to sustain a viable bear population, rather than by a political boardroom act.”

“The best grizzly habitat is found in the north end of the ecosystem, outside the wilderness is unprotected roadless areas in the upper Clearwater and St. Joe drainages and in the isolated back country of the River of No Return Wilderness.”

*Response.*— A large experimental area was established for Alternative 1 and 1A to promote management flexibility for grizzly bears that may travel outside the recovery area. The USFWS attempted to explain that local communities within the experimental area would benefit by increased management flexibility for bears under nonessential experimental status. Bears outside the experimental area boundaries would be treated as fully threatened and management options would be more restrictive towards protection of the bear. This idea was not clear to local people, who continually requested a smaller experimental area. Under Alternative 1, grizzly bears outside the recovery area (in the experimental area) would be accommodated by the CMC, and would not be disturbed unless they demonstrated a real and imminent threat to human safety or livestock. Further, results of recent habitat studies in the BE indicate the habitat is capable of supporting a viable population of grizzly bears (under Alternatives 1, 1A, 4, 4A). These reports are included in Appendix 21.

**6. Bear Sources.**— A voluminous number of people commented on where reintroduced grizzly bears will come from. By far the most commonly voiced concern was the relocation of grizzly bears from the Northern Continental Divide Ecosystem (NCDE) and Yellowstone Ecosystem (YE) populations where they are listed as Threatened to the Bitterroot Ecosystem, where they may be listed as a nonessential experimental population. People thought relocated bears would no longer be protected as a threatened species. A second concern commenters had was that the removal of these bears from their respective ecosystems would delay meeting the ecosystem's recovery objectives. Based on these assertions, several people felt that the proposed transplanting would be illegal. Many people suggested a “scientific committee” should determine where there would be non-threatened populations which could provide a source of bears. Two people suggested “crossfostering” grizzly bear cubs with female black bears in an effort to get bears into the Bitterroot Ecosystem. A small number supported taking one or two bears from the YE and the NCDE each year. A Scout Leader was concerned about placing “park” bears in Idaho, he felt that these bears are unafraid of humans, and therefore would pose additional risk to him and his troops. Idaho Fish and Game was concerned that the Bitterroot ecosystem would become “a depository for problem bears”.

“We have not even obtained agreement from the Canadians indicating they are willing to provide us with bears. Given the current mortality limits in the YE and the NCDE, we are not sure we can safely provide these bears locally, without adversely impacting recovery efforts in these areas, and inflicting future set backs in grizzly bear recovery and delisting efforts.”

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“...no bears should be taken from any threatened populations including Yellowstone, and Glacier/Northern Continental Divide ecosystems for introduction into Idaho.”

*Response.*— The use of listed members of a species to create an experimental population of that species in a currently unoccupied area is what was intended by Congress in the amendments adding the 10(j) experimental population opportunity. There will be no significant detrimental effects to the health of source populations because mortality limits in the Grizzly Bear Recovery Plan and the British Columbia grizzly bear management criteria will be met during implementation of any reintroduction. No bears will be removed from any ecosystem in the U.S. if the mortality limits for that ecosystem have been reached or are even close to being reached. In addition, the USFWS will agree to make the decision to remove bears from any ecosystem in Montana or Wyoming only in consultation with the Fish and Game Department of that state. The USFWS has no intentions to allow the removal of grizzly bears from any ecosystems in the U.S. to impede recovery of those source populations. The USFWS will work in concert with the Fish and Game Departments of those states to judge these possible impacts to assure that this is the case.

Contribution of bears from either the YE or NCDE will be based on the current mortality levels for that ecosystem. Mortality data are updated annually and any removal of bears from either ecosystem will be predicated on achievement of the mortality limits. Since these data are updated each year, it is necessary to recalculate mortality levels for both the NCDE and YE prior to making a decision on the origin of any relocated bears. The specific number of grizzly bears that can be obtained from the NCDE or YE is unknown at this time. The female contribution will be designed to minimize impacts on the source population and no female grizzly bears will be removed from within the NCDE or YE recovery zone boundary or from within 10 miles outside the boundary. The male contribution can be a higher number because population increase is affected little by removal of subadult males. Since no bears will be removed from the YE or NCDE if the mortality limits will be exceeded, and no female bears will be removed from within the recovery zone or within 10 miles of the recovery zone boundary of either ecosystem, then the effects on recovery of any removals of bears from the NCDE or YE will be nonexistent. See Chapter 4, Alternative 1 for the analysis of impacts to source populations.

Any bears removed from Canadian populations would be removed under the management constraints on Canadian grizzly bear management which limit human-caused mortalities. We fully support those constraints. Further, no “nuisance” or “problem” grizzly bears will be reintroduced into the BE.

**7. Grizzly Recovery in other Areas of the Country.**— A variety of comments related to how management of grizzly bears in other areas would affect management in the Bitterroot Ecosystem (BE). One theme among these comments was how delisting in other areas would relate to bear management in the BE. People did not want the BE reintroduction effort to divert USFWS time and money from the delisting process in the Yellowstone Ecosystem and the Northern Continental Divide Ecosystem.

“Recovery successes such as delisting of the bear in the Yellowstone ecosystem are needed to foster public acceptance of endangered species recovery, including the Bitterroot grizzly.”

*Response.*— The USFWS agrees that adequate financial support is necessary to allow management and monitoring of bears. Funding for grizzly bear recovery in the BE will be solely independent from funding for grizzly bear recovery in other ecosystems. Implementation of recovery activities would only occur if additional funds become available above and beyond recovery efforts in existing ecosystems. Wording has been added to stress that the USFWS should evaluate costs of recovery on an ongoing basis. The CMC will also be responsible for evaluating management costs and requesting additional funding to meet monitoring

and management needs as required.

**8. Monitoring / Evaluation.**— Comments on this issue pertained to people's concerns about how monitoring would occur throughout the reintroduction effort, and then how monitoring would help in project evaluation. Several people objected to placing radio collars on bears because, “bears are a symbol of wilderness”. Several also did not believe the DEIS clearly stated the criteria to use in determining the “success or failure” of the reintroduction. Technical letter 836 from the Nez Perce Tribe suggested specific criteria to evaluate the project.

“We feel that specific indicators of recovery progress, developed by the scientific advising committee provided to the Citizen management Committee would be useful in making subsequent management decisions.”

*Response.*— Additional monitoring items have been added to Alternative 1 to aid in evaluation of recovery success or failure. Most suggestions of the Nez Perce Tribe were added to the FEIS.

**9. Capture and Release Methods.**— The main concern people had about handling bears was how the bears would be affected. People questioned whether the trapping and relocation operation would somehow change the bear and it's outlook on humans. Others wanted a more detailed description of which bears would be relocated and where they would be released.

“The draft EIS is not specific in providing the plan for placing grizzly bears in the Bitterroot Ecosystem. Where, specifically will the bears be collected? Where will the bears be released? How will the bears be transported?”

“...there is an Idaho State law that reads that no person shall import into this state or release in the wild any species of wildlife except by a permit issued by the director of the Idaho Department of Fish and Game. To the best of my knowledge this has never been done and will probably not be done.”

*Response.*— Appendix 6 provides information on techniques for transplanting grizzly bears. Since it is unknown at this time which source populations will be able to provide grizzly bears for a Bitterroot reintroduction, it is difficult to prepare a detailed plan for trapping and transplanting. If the decision is made to reintroduce grizzly bears, they would likely be placed in a remote area of the Selway-Bitterroot Wilderness.

**10. Protect Grizzlies; Habitat Protection/Security/Restoration; Effects on Grizzlies from Human Incursions.**— These issues were analyzed together because the comments overlapped greatly. The vast majority of people who made comments regarding the habitat and security of grizzly bears favored Alternative 4 because they felt it would provide the best chance of successful reintroduction. A large percentage of these people also commented in opposition to Alternative 1, saying it would not provide the habitat and security grizzlies need. Respondents who felt habitat security was a priority felt road removal and protection of roadless areas within the recovery zone should be a priority. People were concerned that a road density standard was not established for the Bitterroot Ecosystem in the DEIS, some suggested that road densities be maintained at less than .25 miles/sq. mi. Many felt management standards in place for other fish and wildlife would not be adequate for grizzly bear recovery. A large number of people commented specifically on the effects that roads, logging, and mineral extraction have on grizzly bears. Very few commenters expressed that logging and other extractive activities would not affect the grizzly.

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“I think all grizzly bears deserve the full legal protection as a threatened species under the Endangered Species Act.”

“ How can unprotected habitat be factored into recovery plans, especially when no formal Section 7 consultation will be required with the preferred alternative? The mission of the US Fish & Wildlife Service is to conserve, protect, and enhance fish and wildlife and their habitats...The preferred alternative does nothing to validate this mission statement.”

*Response.*— Research conducted by Dr. Mark Boyce and John Waller to evaluate habitat capability of the BE used road density as calculated using a moving windows technique as one data layer in their model. Modeling results indicate the Selway-Bitterroot and Frank Church Wilderness Areas could support 234-257 grizzly bears and the non-wilderness portion of the Bitterroot Evaluation Area (described by Davis and Butterfield 1991) in the North Fork of the Clearwater River drainage could support an additional 74 bears. There are areas with road densities greater than 1 mile per square mile where bears would have a greater risk of mortality. But the Recovery Area and Recovery Zones in the various alternatives all provide ample roadless habitat to protect a core grizzly bear population.

**11. Citizen Management Committee.**— While many applauded this Committee as a positive step forward in front-end coalition building, more respondents were concerned that the committee would be made up of individuals who would put political and economic interests ahead of the bear's well being. Several comments reflected a concern on the balance of membership for Idaho and Montana. Also, respondents feared the committee would lack the scientific expertise needed to make good decisions. Many respondents believed the CMC would be biased toward local interests versus national.

### *Supportive of CMC:*

Numerous respondents who supported Alternative One primarily cited the CMC as the basis of their support. Many said they supported the CMC because they believed people living in the area should be involved in the decisions that affect their lives. They also liked that it would broaden public involvement and serve as a model for reducing conflict and bringing diverse interests together. Many said the CMC is the strength of the proposed action. Several cited a survey of residents that reported 62% support grizzly recovery if the CMC is established.

Numerous respondents said they supported Alternative 1 because of the various interest groups involved in its development. Several respondents supported the CMC with full authority to act for the Secretary of Interior. They also supported changes recommended by Governor Marc Racicot (Montana) that would strengthen protection of the CMC concept.

“This alternative allows local people and scientific experts to cooperatively decide on how grizzly bears will be restored and managed. Without this alternative, it is doubtful that grizzly reintroduction could proceed. Adoption of this alternative would also provide an exciting opportunity to determine whether such shared management can be successful.”

“This plan would provide for a committee of local citizens to manage the reintroduction and strike a balance between protecting the grizzly bear and maintaining the needs of communities surrounding the recovery area.”

### *Opposed to CMC:*

There were numerous critics of the Alternative 1 Citizen Management Committee. Several respondents stated the CMC proposal is illegal because the Secretary of Interior is not legally able to delegate

*Issues from DEIS Comments and USFWS Responses:(Management Strategies)*

decision-making authority to this group. Conversely, many opposed the concept because they didn't feel the CMC would be given enough decision-making authority. There was considerable mistrust by many that as soon as bears were reintroduced the Secretary of Interior would reassume the authority granted to the CMC in the special rule. Numerous individuals called for more clarity in the delegation of authority to the CMC as well as what actions the CMC is likely to take. A few respondents were concerned this project would promote single-species management that would overlap into land management decisions within the whole recovery area and adjacent lands. Supporters of Alternative Four believed grizzlies in the Bitterroot Ecosystem should be managed by a Scientific Committee and existing management agencies, and not by the CMC as proposed under Alternative 1. They were concerned about political influence in selection of the CMC, management of such an important species by nonprofessionals, and by the unfair delegation of management of a national resource to local citizens and their interests.

“...the CMC is a bad idea...No requirements for experience managing or even having any knowledge of grizzlies. Selection of members only from communities from within and adjacent to the recovery and experimental population areas (precludes the selection of most of the citizens of the U.S. and most qualified grizzly bear biologists). Likelihood that most CMC members would place the interests of logging, mining, and ranching above promoting recovery of a health population of grizzly bears in the BE.”

“The CMC is a political expedient. The political makeup of the CMC is assured by allowing the govns. of Idaho and Montana to appoint members to this committee, with NO requisites for training, expertise, or knowledge of the grizzly and its biological needs. Also by stating that only people from areas adjacent to the recovery area can sit on the CMC, the majority of the experts in the field of grizzly biology, population genetics, habitat, etc., will be excluded.”

*Response.*— The concept of management flexibility is related both to the decisions made and to who is making those decisions. An analogy is travel from one city to another. Several routes, speeds, and dates of departure are possible, but the destination is the same. We believe that when a person is making his or her own decisions, they generally feel more comfortable than when such decisions are made by others. This is the concept that is the foundation of the CMC. If local people are making the decisions that will lead to recovery, they will feel more involved and more in control and therefor more comfortable than if those decisions were being made by others. The CMC will be making the decisions that will lead to grizzly bear recovery in the Bitterroot ecosystem. As an example of management differences, the CMC may choose to implement a hunter education program in response to illegal killing of bears with eventual recommendations to limit hunting in certain areas if the education program is unsuccessful in stopping illegal killing. The USFWS, if it were managing the situation, might choose to suggest immediate limits on hunting. Different possible approaches to the same problem are evidence of management flexibility. The objective of both actions is the same. How they achieve the same result may be different. The creation of a CMC to manage a listed species is possible because of the experimental approach of reintroduction under section 10(j) of the Endangered Species Act, with its increased flexibility. Such local management by citizens is not possible under fully listed status.

Several clarifications/changes were made to the CMC structure and function. These changes were in response to the following DEIS public comment issues: how the Committee will be selected; need for scientific expertise on the Committee; need for clarification regarding mission, operations, and authority of the Committee; need for further insulation of the Committee from political influence; and need for a process to resolve conflicts between the Secretary and Committee. (See Chapter 2, Alternative 1).

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**12. Bear Mortality Quotas.**— Most respondents were concerned about the effects to the allowable human-induced bear mortality quotas for the YE and NCDE from removal of bears for relocation to the Bitterroot Ecosystem. The state of Montana felt that transplanted bears should not be counted against mortality quotas or impede the delisting procedure for the YE and NCDE. Private interests on the other hand felt that bears removed from either the NCDE or YE should count against mortality quotas, and therefore the USFWS should not remove bears from either of these two ecosystems because of potential harm to these recovering populations.

“The EIS is deficient in that it does not address in any way the implications of this (removal of bears) on delisting. The State of Montana will vigorously oppose an EIS that does not comprehensively and scientifically address the full range of delisting issues presented by the yearly or cumulative impacts... and will oppose any alternative that would slow delisting in the NCDE and the Yellowstone ecosystem.”

**Response.**— The FEIS includes further analysis of the impacts to source populations from removal of grizzly bears (Chapter 4, “Impacts on Source Populations”). Losses of bears from populations through human-caused actions are regulated and limited to assure the health of these populations. Mortality limits are in effect in both the NCDE and YE. Only grizzly bear mortalities that occur within designated recovery zones or within a 10-mile buffer area around the recovery zone boundary are used in the calculation to determine if a population has exceeded mortality limits established by the Recovery Plan. Thus, bears removed from areas more than 10 miles outside recovery zone boundaries in the NCDE and YE would not be counted as mortalities.

Contribution of bears from either the YE or NCDE will be based on the current mortality levels for that ecosystem. Mortality data are updated annually and any removal of bears from either ecosystem will be predicated on achievement of the mortality limits. The specific number of grizzly bears that can be obtained from the NCDE or YE is unknown at this time. The female contribution will be designed to minimize impacts on the source population and no female grizzly bears will be removed from within the NCDE or YE recovery zone boundary or from within 10 miles outside the boundary. The male contribution can be a higher number because population increase is affected little by removal of subadult males. Since no bears will be removed from the YE or NCDE if the mortality limits will be exceeded, and no female bears will be removed from within the recovery zone or within 10 miles of the recovery zone boundary of either ecosystem, then the effects on recovery of any removals of bears from the NCDE or YE will be nonexistent. The USFWS has no intentions to allow the removal of grizzly bears from any ecosystems in the U.S. to impede recovery of those source populations.

### **LAWS, RESTRICTIONS, RIGHTS, AUTHORITY**

**1. Federal, State, Local and Tribal Authority.**— Most of the comments on this particular issue stemmed from people who live in the area and are fearful of the government coming in and taking away the rights they have from the states of Idaho and Montana. People felt that the grizzly bear will bring more regulations on their lives. They felt the USFWS has no legal right to reintroduce bears into the Bitterroot Ecosystem since the state government is opposed to the plan. Several claimed Idaho has a right to “self determination under the constitution of the United States.” Some people questioned the legality of the Secretary of Interior designating authority to a Citizens Management Committee. Many believed the USFWS should retain management responsibilities for reintroducing grizzly bears. Some people felt the federal government is arrogant because it is not listening to local concerns. These people cited local and state laws being violated by the reintroduction process. Numerous people asked if the USFWS would be the responsible party for any deaths caused by reintroduced grizzly bears. Still others were concerned this is an unfunded mandate and

that the states would be stuck with the tab for bear reintroduction costs.

A few comments were supportive of the federal government being in charge of reintroduction. They were voiced by individuals who believe this is a national issue and should be handled by the Secretary of Interior. Some did not believe the management should be left up to the states and especially to the Citizen Management Committee with local people on it.

“I don't think the federal government should have the right to overstep the jurisdiction of the citizens of the State of Idaho. Our governor, Phil Batt, the Idaho State Fish and Game, and the majority of the citizens of Idaho are opposed to the introduction of the grizzly bear to our state.”

“The Secretary of Interior must remain ultimately responsible for all final actions of this experimental program...should not diminish the overall responsibility of the applicable agencies to adequately oversee this process.”

*Response.*— Throughout the planning and NEPA processes for this proposal, the public has been invited to participate and comment. Citizens of Idaho and Montana have had increased opportunity to be involved through participation in 14 public hearings. Members of the EIS team have given numerous presentations to governors, county commissioners, local governments and civic groups, federal agencies, and state agencies in Idaho and Montana. As a result of this extensive dialogue, the USFWS has modified the EIS substantially to accommodate the significant issues and ideas brought to us from the public. The USFWS is by no means imposing its will on a state. The USFWS is the primary agency responsible for recovery and conservation of threatened species, including grizzly bears, in the lower 48 states under the Endangered Species Act in 1975. The USFWS is mandated by Congress to conserve listed species and the ecosystems upon which they depend. The Grizzly Bear Recovery Plan called for evaluation of the Bitterroot Ecosystem as a potential recovery area, and that resulted in the preparation of this EIS.

**2. Restrictions on the Use of Public Lands; Effects of Grizzlies on Public Access.**— These two issues are discussed together because they are so closely related. Numerous individuals commented on how grizzly bears would effect their access and use of public lands. Most of these comments were divisive.

*Opposed to Land Use Restrictions:*

Many respondents, particularly residents of Idaho and Montana, indicated they do not want any restrictions placed on the use of public lands. A primary point of contention for many was the threat of road closures that would restrict their access to public lands. Many believed this is an attempt to “lock up” public lands. They questioned the statements made in Alternative 1 that no trail or road closures are expected solely for grizzly bears. They were concerned about the effects to the local economy, restrictions on multiple-use activities, and the effects on recreation uses on public lands. Some commented their right of personal freedom would be restricted.

“The CMC would be responsible for recommending changes in land-use standards and guidelines as necessary for grizzly bear management. Will the public have any input into these recommendations or changes in management plans? If these plans need to be incorporated into the various Forest Plans for implementation that would provide an avenue for public review. The process should be verified in the final EIS.”

*Positive or Neutral Responses on Land Use Restrictions:*

Some respondents were positive or neutral about grizzly bear recovery efforts and believe people and bears

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can coexist. They viewed some of those opposed to the recovery effort as self-serving, and reacting to perceived threats to their self-interests.

“Ranchers would be forced to share at least a portion of the PUBLIC LANDS which they now consider their own land to do with as they wish. Other resource users would also be required to share. That is a difficult prospect for many people. Selfish habits, such as the ones they’ve spent decades cultivating, die hard.”

*Response.*— The FEIS has been modified to state that trail use restrictions for public safety are expected to be rare, and that such restrictions, if they did occur, would be short-term in response to a rare instance such as a grizzly bear feeding next to a trail on a carrion source. We have added the additional statement that the CMC should develop a trail restriction policy to enhance public safety. Further, the CMC is required to make decisions and take actions that minimize social and economic effects; and as such, the CMC would work to minimize any restrictions on public access and use of public lands. Grizzly bears and humans can co-exist as is evidenced in areas like the Flathead Valley of Montana, the Bob Marshall Wilderness, and Yellowstone and Glacier Parks and surrounding ecosystems.

**3. *Private Property Rights.***— Many people felt the grizzly bear is a tool the federal government is using to “steal private property rights” and to “establish more government control.” Comments on this issue indicated the public views the proposed reintroduction as a threat to their private property. Some suggested that the federal government should compensate landowners for the land value losses once grizzly bears are present. Commenters felt there would be land use restrictions imposed by grizzly bear management even though the DEIS says there would not be. Some people accused the government of lying when it says no land use is expected to be altered; they state that the Final EIS should be more truthful about this issue. Several respondents emphasized the USFWS must cooperate with private landowners to recover listed species such as the grizzly bear since private lands do provide habitat for wildlife species. A few respondents voice their concern with how this effort will affect their access to irrigation dams in the reintroduction area.

“The grizzly bear is your vehicle to steal private property rights under the disguise of the Endangered Species Act, and to establish more government control.”

*Response.*— The preferred alternative proposes to allow local citizens to manage the reintroduced grizzly bear population, so that impacts of grizzly bear recovery would be more in their control.

**4. *Law Enforcement.***— Only four comments were received on this issue, one is included below:

“Be advised, that this office (Custer County Prosecutor) will prosecute anyone and every one who introduces or conspires to introduce any wildlife into Custer County without a permit as provided by law.”

*Response.*— The ESA is federal law, and this supercedes state law.

**5. *Interagency Grizzly Bear Committee Guidelines.***— Only three comments were made on this topic.

“...support the role of agency personnel in dealing with bears whose interactions with humans are problematic...such actions emphasize bear protection within the experimental, non-essential designation...Recommendation: Agencies should be allowed to follow current guidelines, as allowed in other ecosystems under full threatened status, until new guidelines are proposed and accepted by the management

committee.”

*Response.*— The IGBC Nuisance Bear Guidelines will be followed under Alternatives 1, 1A, 4 and 4A.

**6. Compliance with Forest Plans.**— People addressing this issue felt the DEIS failed to consider possible conflicts with forest plans. Concerns from both sides of the issue were expressed, some questioned the need to manage lands for “a population of grizzly bears that does not exist.” Others felt the existing forest plans do not provide sufficient standards and guidelines for grizzly bear recovery.

“Existing Forest Plans are not sufficient for grizzly standards and guidelines. New standards and guidelines, specific to grizzly bears, must be established using specific data for bears.”

*Response.*— Under Alternative 1, the CMC would develop recommendations on existing management plans and policies of land and game management agencies, as necessary, for the management of grizzly bears in the Experimental Area. An example could be a recommendation on improved sanitation to minimize attractions to bears at recreation sites. The CMC may make recommendations to land and game management agencies regarding changes to plans and policies, but the final decision on implementation of those recommendations would be made by those agencies. If the CMC recommendations require significant changes to existing plans and policy, and the agencies tentatively agree to accept those recommendations, then the requirements of NEPA may apply. Land management agencies would have to follow the appropriate public processes such as NEPA, if necessary, or public comment such as with possible Forest Plan amendments should the management agencies choose to implement any CMC recommendations. Such management plans and policies will be in accordance with applicable State and Federal laws. Under Alternatives 4 and 4A, the USFWS would consult under Section 7 on Forest Plans and projects.

**7. Wilderness Act.**— Two of four comments received on the Wilderness Act are included below:

“Not only is reintroduction good for the species, but it is consistent with the intent of the Wilderness Act.”

“(Wilderness Act states) these lands 'shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment'. I feel that this proposed reintroduction has a potential to impair the enjoyment of many of the users.”

*Response.*— Restoration of a native species is consistent with the intent of the Wilderness Act. Some users may avoid the wilderness areas, while others may increase their use if grizzly bears are restored.

**8. Local Control.**— Within this issue, many felt grizzly bear management in the BE should rest upon the local citizens not people from other states or people who will not be directly impacted by grizzly recovery. Since the people of western Montana and central Idaho would be most affected by reintroduction, they felt they should have direct say in the bear's management; many supported the idea of a “Citizens Management Committee.” Still others felt the grizzly bear should not be reintroduced to their “back door” unless there is a majority of local support. Many commenters felt the Federal Government is not listening to them. Conversely, some respondents contended that since grizzly bear recovery is a national issue then management should be at a national level; and the bear should be managed by a broad based “scientific committee.”

“I do think it is a national issue. In my line of work, I meet a lot of hunters that come from all over, not just

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Idaho and Montana. They come from, believe it or not, New York and California, from Connecticut. So it is of the national concern and I encourage you to adopt Alternative four.”

“No matter how much people in other states may want to see grizzly bears in Idaho, Idahoans should have the right to make that decision...Turn this question around for a minute. This isn't just an Idaho issue...I don't think that I have the right as an Idahoan to insist that California accept introduction of the grizzly to the Central Valley just because I think there is food and habitat to support it there.”

*Response.*— While the CMC concept does not “guarantee” balanced decision-making which will consider the impact of the CMC’s decisions on the local communities, we can think of no better way to balance the recovery of the grizzly with the needs and interests of local people than to have local people on the decision-making committee itself. Management by a national committee would prove inefficient and costly.

**9. Best Available Science.**— Numerous people were concerned the Citizen Management Committee (CMC) would not use the best available science because members would not have a biological background and would have a bias against grizzly bear recovery. Many felt that the CMC should be replaced with a different type of committee with more ecology and genetics training. This committee, appointed by the National Academy of Sciences, would determine where bears could come from as well as make management decisions related to recovery in the Bitterroot Ecosystem (BE). Many of the commenters expressed support for alternative four saying it is based on the needs of the grizzly bear and not on politics. A few people contended the idea of reintroduction into the BE is based on poor science, and therefore should not be attempted.

“(management) should be implemented by oversight management by a Scientific Committee having scientists from the private sector plus some input from U.S. Fish and Wildlife Service, the Nez Perce Tribe and state wildlife management agencies in Idaho and Montana all with some ecological comprehension.”

“I favor a joint scientific and citizen management committee. This would guarantee all aspects of grizzly bear recovery and management be considered and provide an educational opportunity for strengthening this type of partnership.”

*Response.*— FEIS Alternative 1 directs the CMC to use the best available scientific and commercial data in making grizzly bear management decisions. Also, in response to public comment on the Draft EIS, two scientific advisors have been added to the CMC (see Chapter 2, Alternative 1). Two scientific advisors would be appointed by the Secretary to the CMC as non-voting members to attend all meetings of the CMC and to provide scientific expertise in support of CMC management recommendations. These scientific advisors would not be employed by Federal agencies involved in grizzly bear recovery. The Secretary of Interior is to contact the Wildlife Society Chapters in Idaho and Montana and the Universities of Idaho and Montana for nominations and he/she would select one wildlife scientist representing each state, and appoint them as advisors.

**10. Grizzly Bear Recovery Plan.**— A few respondents addressed the Recovery Plan specifically and how it relates to the DEIS. A discussion of linkage zones is in the Recovery plan but they are not addressed in the DEIS. Several people mentioned this fact. The other general theme is how the CMC will implement the Recovery Plan that has already been developed for the Bitterroot Ecosystem.

“The actual recovery plan should be further outlined in the FEIS and refined by the Fish and Wildlife Service

*Issues from DEIS Comments and USFWS Responses:(Ecosystem Management)*

for later publication and peer review, before it is turned over to a management committee for implementation. The management committee should be responsible for achieving the goals of the recovery plan, not for development of a recovery plan.”

*Response.*— The CMC is responsible for implementation of the Recovery Plan. The DEIS and FEIS are based on information in the Bitterroot Chapter of the Grizzly Bear Recovery Plan.

## **ECOSYSTEM MANAGEMENT**

**1. Grizzly Bear As a Missing Component of the Ecosystem.**— The vast majority of comments on this issue claimed the grizzly bear is a missing component of the Bitterroot Ecosystem (BE). People felt the grizzly bear would enhance their wilderness experience by restoring the top predator of the food chain. People claimed the grizzly is an indicator species that would improve the health of the ecosystem once the bear is reintroduced. Some felt it is mankind's responsibility to return the grizzly to the BE because man caused its eradication. However, several people stated the grizzly is not native to the BE. Others felt that the BE doesn't need the grizzly bear to function properly, and to make the land like it was “circa 1847 is utter nonsense.”

“...the griz belongs in central Idaho, as it does in several other ecosystems across the West. It is an integral part of the ecosystem, and is part of our wildlife heritage.”

“I hate to disillusion people, we don't have black bears in our back yard. These bears and the lions and the tigers and everything else, have people in their front yards.”

“Returning grizzlies to the country they once occupied will restore the ecological balance to the largest piece of roadless land in the lower forty-eight states.”

*Response.*— The grizzly bear is native to the Bitterroot Ecosystem. Appendix 4 discusses the historical evidence and current status of grizzly bears in the BE. The USFWS, with support of the Interagency Grizzly Bear Committee, proposes to recover the grizzly bear and restore this component of the BE by reestablishing the species within this portion of its historical range. The recovery of grizzly bears in the BE will allow the return of this prominent native omnivore now missing from this large block of Rocky Mountain wilderness.

**2. Is Grizzly Bear Native to the Bitterroot Ecosystem?**— On one hand the public was adamant that a population of grizzlies exists in the Bitterroot Ecosystem. Yet, people from the same general area questioned whether grizzlies are even native to the BE. The spectrum of comments received reflects this discrepancy within the public. Respondents frequently used these arguments to disagree with the idea of reintroduction. People said if there are already grizzlies there, they should be allowed to grow at their own rate. Bears, therefore, cannot be reintroduced as experimental nonessential. On the other hand, if grizzlies are not indigenous to the BE, the habitat to support a population must not be there for a self-sustaining grizzly bear population. Reintroduction would be a waste of resources.

“There exists reliable evidence that a small population of grizzlies exist in the Salmon-Selway. This invalidates any attempt to institute the non-essential, experimental population status...Kunkel and Servheen 'cautioned that their efforts did not confirm the absence of bears in the BE because of the small area surveyed and low camera density(1/110 sq. mi.) used (3-15). The Melquist analysis (1985) of 88 reports of grizzlies in the Salmon-Selway found that 14 (16%) were 'Probable' and 37 (42%) 'highly possible'. The USF&WS cannot continue to ignore these results and maintain its credibility.”

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“I do not want the Grizzly Bear introduced in Idaho. This was not a historic Grizzly area, as California was. When Lewis and Clark came through central Idaho they did not find very much game, and no mention of Grizzly Bears was made in their journals in this area.”

*Response.*— Appendix 4 provides documentation that proves grizzly bears are native to the BE. No grizzly bear researchers have provided any documentation whatsoever of any grizzly bears in the Bitterroot experimental area. See letter from Wayne Melquist of Idaho Fish and Game (Appendix 23).

**3. What is a Viable Grizzly Bear Population?**— Most comments questioned whether the recovery goal of 280 bears would produce a self-sustaining grizzly bear population. Some felt that more bears will be needed in the Bitterroot Ecosystem to establish a healthy bear population and to increase the long term survival probability. Several respondents felt that grizzly bear recovery in the BE is not needed for the long term survival of the bear in the lower 48 States.

“...(the) recovery population goal should be refined and solidified from the current statement that establishes 'a tentative recovery goal of approximately 280 grizzly bears...' While we understand this effort is an 'experiment' there is no basis to believe that an isolated population of 280 is legitimate size to be considered 'recovered'...”

*Response.*— A viable population is one that has an acceptable probability of survival. Given real world issues, the probability of survival for a population has nothing to do with theoretical genetic issues (no wild population of any animal has ever been documented to go extinct because of genetic problems) and everything to do with the quality and effort of management to address the needs of that population in a responsive and dynamic manner. We believe that the estimates of viability will have to continuously be upgraded based on the best available science and data and that the population will have to be carefully monitored in the future as recovery proceeds to assure that management meets the needs of the bears. The management of a grizzly bear population in the Bitterroot would be an adaptive process over time, an all reintroduction alternatives rely on the continued application of the best available science in management of the recovering population. Also, see response to Issue #5, “Range Requirements of Grizzly Bears” below.

**4. Population Corridor Linkages.**— Numerous comments were received on this issue particularly relating to travel corridors and linkages. Many people called for linkage zones to be incorporated into the FEIS because linking the Bitterroot Ecosystem to other ecosystems such as the Cabinet/Yaak and the Northern Continental Divide Ecosystem would improve genetic diversity and improve the overall health of grizzly bear populations in the lower 48 states. People were critical of Alternative 1 because it would prohibit linkage zones between the experimental-nonessential population and other bears; on the other hand, alternative four supporters favor corridor management. Only a handful of comments were against establishing linkage zones.

“...for grizzly bears to survive in the lower 48 states, each additional population with potential linkage to other populations increase the probability for survival (1-5). Alternative 1 provides for NO linkage corridors, and in fact precludes them by designating the Bitterroot population as experimental, non-essential, a population which by definition must be geographically isolated from all other populations.”

“I support a grizzly bear plan that develops migration corridors between Idaho's grizzly habitat and other populations to ensure genetic health and diversity of all Northern Rockies populations.”

*Response.*— The USFWS intends to complete a linkage zone analysis that will detail the possible linkage

areas between the existing ecosystems and between the Bitterroot and existing ecosystems. The linkage zone analysis is a GIS-computer modeling effort that looks at the levels of human impact and activity in the intervening areas between ecosystems and identifies the best linkage areas based on this human activity. This linkage zone analysis is a separate Recovery Plan Task and will be completed regardless of which alternative is selected for the Bitterroot. Maintenance of linkage zones is maintenance of the opportunity for grizzly bears and other wildlife species to move between the existing large blocks of public lands in order to maintain demographic and genetic health. The identification of linkage zones does not mean grizzly bears will use such zones. In contrast to wolves, grizzly bears do not disperse much.

Given that the nearest grizzly population to the Bitterroot experimental area is approximately 40 miles away in the Cabinet Mountains, and that data from more than 550 different radio-collared grizzly bears since 1975 shows no movement between any ecosystems, it is highly unlikely that such movement would occur into the Bitterroot from an area currently occupied by grizzly bears in the foreseeable future. In the long-term, the opportunity for bears to move between these ecosystems will improve the health of these populations. In the near term, restoration of a grizzly bear population in the Bitterroot will require placement of bears rather than waiting for eventual dispersal into this area, due to the limited distances of movements of bears outside of existing range to date. The preferred alternative does not preclude movement between systems. It is promoted because the likelihood of natural movement into the Bitterroot in the near term is highly improbable.

**5. Range Requirements of Grizzly Bears.**— The comments on this issue focused on the habitat base within the Bitterroot Ecosystem. People felt the preferred alternative doesn't provide enough habitat to support a grizzly bear population. To address this issue, some felt the recovery area should be enlarged to encompass the entire "Greater Salmon Selway Bitterroot Ecosystem." Others felt if the habitat is insufficient, then reintroduction should not proceed. People were concerned that inadequate spring range in the recovery area, would cause bears to move into the valley bottoms where they could conflict with human activities.

"Bears need fall and spring range that would include foothills and private land. With only two months of summer in the wilderness, there is not forage for them to survive."

"...recovery area should be expanded to include essential grizzly bear habitat...one quarter of the Selway-Bitterroot ecosystem...alone will not supply enough food and space for grizzlies to survive."

*Response.*— The habitat-based population viability assessment that was completed between draft and final EIS indicates there is sufficient habitat, food resources, and seasonal habitats in the Alternative 1 recovery area and adjacent public lands to the north, to support a viable population of grizzly bears. It is included as FEIS Appendix 21(A, B). This assessment analyzes the habitat suitability for grizzly bears in the Selway-Bitterroot and Frank Church-River of No Return Wilderness Areas and non-wilderness public lands to the north on the Clearwater National Forest. The entire Frank Church Wilderness was analyzed, including areas south of the Salmon River. Study results indicate the habitat in the BE is capable of supporting a population of 308-321 grizzly bears. This number is 10-15% higher than the USFWS recovery goal estimate because further evaluation of the habitats in the southern portion of the analysis area indicate that even though the forb and berry production in these dry habitats is relatively low, the southern half of the analysis area contains substantial stands of whitebark pine as well as populations of elk and deer that can provide food for grizzly bears. Further, Appendix 21D presents data on presence of a variety of grizzly bear foods in the BE. The study by Craighead Wildlife-Wildlands Institute evaluates distribution and abundance of habitats and vegetation suitable for grizzly bears in the Bitterroot Ecosystem. In summary, Appendix 21 provides the best

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scientific information available to indicate the habitats in the BE are capable of supporting a viable population of grizzly bears.

**6. Effects to Grizzlies (Genetics, Disease, Colonization, Bear Safety, Adequate Food).—** People were concerned the grizzly bear in the lower 48 states would suffer a genetic bottleneck. Many supported the reintroduction of the grizzly bear into the BE and managing corridors between ecosystems to help alleviate the threat of inbreeding. They felt an additional population of bears would increase the genetic diversity and increase the long term probability of survival of the grizzly bear. For these reasons respondents opposed alternative one which “isolate” the BE while they supported alternative four because it encourages the development of linkage corridors.

Related to this issue, some felt grizzly bears should not be reintroduced into the BE because there is not enough habitat to support a population. Many stated that natural food sources for the bear (salmon, whitebark pine masts, and huckleberries) do not exist in the BE, and bears would come into conflict with humans in their search for food.

“...there is an argument that salmon are necessary or were necessary for the bear...there is plenty of bears from the Yellowstone clear through the Bob Marshall into Glacier and on up through the Northwest Territories that exist very nicely in the absence of the anadromous fish. The evidence on this is that in the absence of animal protein, you simply have a smaller bear.”

“Reintroducing grizzlies to this wilderness will provide good opportunities for genetic interchange between different groups of the bears, thus improving recovery efforts.”

*Response.*— Recent DNA analysis of the Yellowstone population of grizzly bears has not shown much loss of genetic diversity. Reintroduction of grizzly bears into the Bitterroots would involve individuals from 2 or 3 source populations. This genetic mixing would assure a high degree of genetic variability which should promote population vigor. The health of donor populations is important as well as the genetic diversity of the donor animals. Under the preferred alternative, we will work with scientists to further evaluate these issues in coordination with the CMC. See the response to Issue #4, “Population Linkage Corridors” for information regarding linkages between grizzly bear populations and their affects on genetic diversity.

Appendix 9B provides some background information on salmon as a food source for grizzly bears. Grizzly bear are omnivores, with a diet composed of 90% vegetation and insect matter. “Interior” populations exist without salmon as a food source, and the BE is capable of supporting a viable population without salmon as a food item.

**7. Habitat Security, and Effects on Grizzlies from Human Incursions Outside the Wilderness.**— Many people felt the preferred alternative does little to protect habitat needed by grizzly bears. People felt resource extraction activities will continue as in the past and this will have a negative impact on a recovering population of grizzly bears. People felt road building has to be stopped and road densities standards need to be established in the recovery area to protect habitat for the bear. Alternative 1 does nothing to address these issues in their mind and therefore this alternative should be rejected. On the other hand, people supported Alternative 4 because it protects habitat from extraction industries. People who felt habitat security is important also thought road removal and protection of roadless areas within the recovery zone were paramount. People were concerned the DEIS does not establish a road density standard for the BE, and some suggested road densities be maintained at less than .25 miles/sq. mi. Many felt current management standards for other fish and wildlife would not be adequate for grizzly bear recovery.

*Issues from DEIS Comments and USFWS Responses:(Ecosystem Management)*

“Alternative 1 fails to consider critical habitat and simply introduces grizzlies to a habitat that will not sustain them. It also allows for the continued degradation of the ecosystem by continued logging and road building in roadless areas.”

“Alternative 4 adequately addresses habitat needs by restoring grizzly habitat (by ripping out logging roads and limiting road densities), protecting the land from further commercial extraction, and encompassing the entire Salmon-Selway-Bitterroot Ecosystem to provide the maximum amount of habitat possible.”

*Response.*— The habitat in the recovery area and experimental area of Alternative 1 is adequate to restore a viable population of grizzly bears. A habitat-based population viability analysis conducted by Dr. Mark Boyce for the FEIS indicates the habitat in the BE is capable of supporting a population of 308-321 grizzly bears. This multi-variate analysis considered the impacts of current road densities in the analysis area on habitat security for grizzly bears, and concluded the area is capable of supporting 308-321 grizzly bears (Appendix 21A, B). Further, under Alternative 1, the CMC must make decisions and take actions that lead to recovery of grizzly bears in the BE. They would be tasked with assessing the adequacy of land management standards and guidelines for grizzly bear recovery, and making recommendations to land management agencies for revisions necessary to recover the Bitterroot population. Numerous checks and balances have been added to the CMC process, to include public participation in their decision-making process, two scientific advisors to provide scientific expertise in support of CMC decisions, and a Scientific Review Panel to review CMC progress and make recommendations as to whether their decisions and actions are leading to recovery. If the Secretary of Interior determines CMC actions are not leading to recovery, he/she can resume management responsibility for the Bitterroot population.

The habitat restoration program (including closure of roads on lands managed by the USDA Forest Service) as proposed in Alternative 4 is not within the authority of USFWS to implement, nor is it within the scope of this document.

**8. Ecosystem Protection.**— Many comments stated habitat protection in roadless areas is important for a healthy ecosystem. People felt road building and extractive industries should be restricted to help recovery of the grizzly bear. Many expressed their belief if the ecosystem is managed for the grizzly bear it would improve habitat of the ecosystem for other wildlife species as well. Here again numerous people voiced their support for Alternative 4 and their disapproval for Alternative 1. See Issue 7 above for additional comments related to this issue.

“Such closures would also benefit big game and fisheries. Protecting an entire ecosystem, not just a certain species, will help the wild species thrive. It is the only alternative that address sustainability in the region.”

“Protecting grizzly bears also means protecting an entire ecosystem...The destruction of central Idaho by logging will destroy valuable social resources and disrupt the ecological balance of the entire region.”

*Response.*— Restoration of grizzly bears in the Bitterroot Ecosystem would replace a missing component, and in this way would improve the health of the ecosystem.

## **EFFECTS OF GRIZZLIES**

**1. Effects of Grizzlies on Human Health and Safety.**— Comments on the issue of human safety were of two distinct and opposing schools of thought. One line of thinking was grizzlies would be certain to attack humans. The opposing view was grizzlies would pose less of a threat than some people believe, and in

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comparison to other dangers people live with on a daily basis, grizzly dangers would be less risky. Comments on this issue were also directed at the various alternatives.

Supporters of Alternative 1 minimized the actual threat to humans from reintroduced grizzly bears because they thought bear numbers would be few and they would be in remote areas with plenty of forage. They also thought Alternative 1 offers adequate protective measures for humans. Those opposed to Alternative 1 felt the alternative does not permit enough protection for humans that recreate or work in the recovery area. Supporters of Alternative 2 wanted a more gradual recovery of grizzly bears in the BE, because they thought reintroduction would cause an accelerated population increase and result in more human conflicts. Numerous comments supported Alternative 3 because of concerns for human health and safety, and were not tolerant of any human injuries from grizzly. Most were from local residents who live or work near the BE, and were concerned about encountering a bear on public or private land. Alternative 4 supporters felt the chance of grizzly/human encounters would be minimal due to the vastness of the recovery area. They felt the grizzly bear is a missing component of the wilderness, and were willing to accept an increased risk to their safety when in the wilderness. Most thought they could easily minimize any risks by planning and practicing safe camping techniques.

*Not a Risk:* The first group of comments favor reintroduction and indicate grizzly reintroduction would not pose a significant risk to human health or safety.

“It’s true that the presence of grizzlies in the Bitterroots would add an element of risk to outdoor adventures—but it’s important to realize just how minute a risk that would be.”

“Those of us who worked with grizzlies as I did in the Bob Marshall know that we can get along with them. As has been pointed out repeatedly, 99 percent of the time they seek to get away from us.”

*Bears Pose a Threat to Human Safety:* Most comments received on this issue, were from people who were concerned with the human safety issue. The comments below reflect the fear people have regarding grizzly bears.

“We enjoy the outdoors and this will seriously affect our daily life. Enjoying our fruit orchard, stopping outside to gather firewood, getting the mail, any normal activity, we will have to check for bears.”

“I’m a member of the Sierra Club and I’m against any introduction of grizzly bears into the Selway-Bitterroot Wilderness or in any part of the State of Idaho...The reason settlers eliminated the grizzly bear from this part of the world is because this bear doesn’t have any aversion to humans and would kill for no apparent reason and this is true today. They are unstable and unpredictable.”

*Response.*— Grizzly bears could be killed in the Bitterroot in self defense or defense of others (as in all fully listed populations). Risk of injury related to grizzly bears would increase with reintroduction, but rates of injury would be extremely low possibly in the range of 1:100 million visitor days. See Appendix 11 for more information on Risks to Human Safety. The DEIS and FEIS do not “minimize potential threats to public safety that may be caused by grizzly bears”. Threats to public safety potentially posed by grizzly bears are discussed in detail in the DEIS and FEIS using data from similar areas in Montana, Idaho, and Wyoming.

Further, the following clarifications/ additions were made to the preferred alternative in response to the issue concerning human health and safety. If a grizzly bear enters the Bitterroot Valley exclusion area, (those private lands lying within the Bitterroot Experimental Population Area outside the Bitterroot National Forest boundary south of U.S. Highway 12 to Lost Trail Pass) state and federal wildlife management

agencies would attempt to capture it and notify the public immediately of its presence, and the public would be updated until the bear is caught. Further, any grizzly bear that occupies inhabited human settlement areas on private land within the Experimental Area that in the judgement of the management agencies or CMC presents a clear threat to human safety or where there is indication that it may become habituated to humans, could be relocated by management agencies in cooperation with the landowner if a suitable relocation site is available. This is to prevent conflicts and possible bear-human injury or the death of bears, and to promote and enhance public safety.

**2. *Effects of Grizzlies on Livestock and Pets.***— Comments that related to Alternative 1 indicated the supporters of the alternative think there would be a low probability of conflict with the livestock industry because there are no grazing allotments in the wilderness portion of the recovery area north of the Salmon River. Those opposed to Alternative 1 felt that either; Alternative 1 would place the welfare of the subsidized livestock industry over that of the threatened grizzly bear, or that there would be too much economic risk to ranchers and the USFWS would not be able to respond to depredation incidents in a timely manner. Comments that related to Alternative 3 were largely supportive because the respondents were concerned about grizzly bear depredation and impacts to the livestock industry. They viewed this alternative as an answer to their concerns. A few opposed Alternative 4 because it does not provide enough protection to livestock owners.

There was concern expressed by local ranchers that their livelihood and lifestyle would be seriously impacted, and they would not be willing to tolerate this impact. They thought the DEIS underestimated the impacts to the livestock industry. There were also many commenters who thought the loss of a few livestock would be well worth it, compared to the importance of recovering grizzly bears in their native habitat. People felt the bear should be given priority over non-native domestic animals. Other commenters thought the grizzly bears and the livestock industry could coexist, and offered examples where this has been successful. A common concern of people who feared grizzly reintroduction would negatively impact their livelihood and safety, was the recovery area would not provide adequate food for bears, and they would follow game populations into the valley bottoms where there would be conflicts with human habitation.

“Low probability of conflict with industry. The vast majority of the BE is designated wilderness - there are no public grazing allotments north of the Salmon River.”

“Most of my neighbors are cattle ranchers. Introduction of the bears will seriously threaten their livelihood. They may lose calves to the bears and their grazing rights will be curtailed because of the bears.”

*Response.*— FEIS Alternative 1 includes provisions for livestock owners to harass grizzly bears pursuing livestock and to kill depredating bears after obtaining a permit from authorized agencies (See Chapter 2, Alternative 1). Livestock grazing, although presently either not occurring or at very low densities within the Alternative 1 Recovery Area, is not expected to be impacted. However, within the Experimental Population Area boundaries, grazing occurs predominantly in the southern portion of the Bitterroot Ecosystem. Consequently, at recovered grizzly population levels and current livestock stocking rates, impacts to livestock would be expected to be similar to levels occurring in portions of the Northern Continental Divide Ecosystem and the Yellowstone Ecosystem. In 50-110+ years (the estimated time to recovery assuming a 2- 4% growth rate) grizzly bears would likely be present within the southern portion of the Bitterroot Ecosystem. Projections indicate that at a grizzly bear population level of 280 bears in the recovery area, yearly livestock losses to depredation by bears could range from 4-8 cattle and 5-44 sheep. Management activities would try to preempt livestock problems. The Citizen Management Committee would try to make all uses compatible

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with recovery. If there are significant conflicts between grizzly bears and livestock within the Experimental Area, these could be resolved in favor of the livestock by capture or elimination of the bear depending on the circumstances.

**3. *Effects of Grizzlies on Big Game Species.***— Respondents supported Alternatives 2 and 3 because they felt the reintroduction of grizzly bears would decimate the game populations in the recovery area. Some comments referred to the recent decline of elk herds in central Idaho, and stated grizzly bears would only exacerbate the problem. Some respondents made the point that grizzlies are omnivores and a large percentage of their diet (in excess of 90%) is vegetation and insect matter, and they are not carnivorous like wolves. These people disputed the concerns of hunters that the grizzlies would kill all of their game. They also felt game populations would adjust to the minimal amount of increased predation from grizzly bears. Others felt there are enough predators already in the ecosystem, and it cannot support another predator. They contended hunters are managing the game populations and there isn't much surplus. Most commenters thought current game populations can't withstand a loss of the DEIS estimate of 504 to 720 ungulates per year to grizzly predation. They asserted hunter opportunity is more important to them, and that they would rather have healthy game populations to hunt than have grizzly bears. Some commented they depend on game meat to feed their families. There were a few commenters that thought the grizzly bear would seriously impact the recruitment of young ungulates (especially elk calves), and that would cause further declines in the game populations.

“It's nonsense for fish and game to work at building up the wildlife herds in Idaho and then turn around and bring in grizzly bears. ...Also we've all suffered in trying to build up salmon, which I believe is one thing grizzly bears feed on.”

“Hunters worries that grizzly bears are going to kill off big game are totally false. Grizzlies do not rely exclusively on big game and would kill very few larger animals.”

*Response.*— Grizzly bears are omnivores, but feed primarily on vegetation. Studies indicate that a grizzly bear diet consists of about 90% vegetable and insect matter. Studies also indicate that because of their eating habits and short periods of predation (usually only during ungulate calving season), 280 grizzly bears may eat as many elk as would 20 adult cougars over a one year period. A population of 280 bears would be expected to prey upon 504 ungulates per year across the Bitterroot Ecosystem. The loss of 504 ungulates to a recovered grizzly bear population would represent approximately 0.38% of estimated pre-harvest populations of ungulates in the Bitterroot area. It should not be necessary to adjust hunting seasons to compensate for grizzly bear predation on ungulates. In central Idaho, baiting of black bears and pursuing black bears with hounds in wilderness areas could be evaluated by the CMC to assure that these activities do not hinder grizzly bear recovery.

**4. *Effects of Grizzlies on Hunting Opportunities.***— Supporters of Alternative 1 viewed the potential to hunt grizzly bears in the future as one benefit of a successful reintroduction of grizzly bears. They also suggested the prohibition of bait and hound hunting of black bears in Idaho as a modification to the alternative. Those in favor of Alternative 3 thought grizzly reintroduction would cause serious declines in big game populations, and reduce or eliminate hunting opportunities. Those in favor of Alternative 4 strongly supported this alternative because it proposes to eliminate baiting and hound hunting of black bears, in order to protect grizzly bears from illegal killing. They also felt protection of roadless areas would benefit game populations and increase hunter opportunity.

*Issues from DEIS Comments and USFWS Responses:(Effects of Grizzly Bears)*

Respondents had differing views regarding the potential effects of grizzly bear reintroduction on outfitters and guides. Many comments suggested a goal of the recovery effort in the BE should be to ultimately manage for a huntable population of grizzly bears. They discussed the importance of hunting (especially grizzly bear) in the Montana culture. Some commenters were supportive of the elimination of bait and hound hunting for black bears in Idaho, and others were concerned that the Special Rule doesn't assure the maintenance of these hunting methods for black bear. Some commented on the potential negative economic effects to local economies from reduced game populations due to grizzly bear depredation. Some respondents discussed the considerable effort in professional management of game populations to provide hunter opportunity, and felt grizzly reintroduction would negate or complicate these efforts by reducing game and fish populations. Other concerns included; potential access restrictions which would impact hunting and recreation opportunities, and safety of hunters in "grizzly country."

"Black bear hunting should not be allowed in any part of the recovery area...too many instances of misidentification by hunters.

"We don't need grizzly bears in the woods. They eat our already low amounts of deer, elks, and other game."

"The Montana Wildlife Federation would like grizzly bear populations to reach a level where they could be treated like other big game species and excess numbers controlled through hunting."

*Response.*— The loss of 504 ungulates to a recovered grizzly bear population would represent approximately one-eleventh of one percent (0.38%) of estimated pre-harvest populations of ungulates in the PAA. Grizzly bear predation is not expected to result in measurable or observable changes in ungulate populations. Potential long-term impacts to black bear population dynamics is unclear, but felt to be minimal. Overall impacts of a recovered population of grizzly bears on other wildlife populations are expected to be minimal. It should not be necessary to adjust hunting seasons to compensate for grizzly bear predation on other wildlife. Hunter access to public lands is not expected to be impacted under the preferred alternative.

**5. Effects of Grizzlies on Other Predators.**— Some commenters specifically referred to the effects of black bears from grizzly reintroduction. They questioned the effects of the proposed ban on baiting and hound hunting of black bears to black bear populations and their fear of humans. The majority of comments questioned the general effects that grizzly bears would have on other predators already present in the ecosystem. They felt the DEIS did not adequately address the relationships between grizzly bears and other predators, and questioned the suitability of the habitat in the BE to support an additional predator. A few comments regarded the recent gray wolf transplant into central Idaho. People thought monitoring and research of the impacts of the gray wolves should be conducted before grizzly bears are added to the ecosystem.

"What will happen to the Bitterroot's many black bears once bear baiting, hound hunting, and eventually all bear hunting are banned in the proposed Bitterroot Grizzly Bear Recovery Area."

"It fails to properly address the complex relationships that exist between bears and other predatory animals like wolves, mountain lions, and black bears. The EIS states: "How predators impact each other and their prey is not very well understood..., so how can the simple assumption that grizzly bears, wolves, mountain lions, and other predators have and do coexist in other ecosystems be applied in this instance...the question that must be addressed in this instance is whether or not this ecosystem contains all the required habitat attributes, systems, and qualities as other ecosystems that support this mix of predators...We would also like to point out that the

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Idaho wolf recovery effort has only been in place in this area for two years, might it not be more advisable to establish the success of that effort before we put grizzly bears into the mix.”

*Response.*— Any restrictions on black bear hunters or other hunting opportunities to reduce the likelihood of mistaken identity kills or to address other potential conflicts could be recommended by the CMC, but would have to be acceptable and implemented by the IDFG and MDFWP. For information on impacts of grizzly bear reintroduction on other BE predators, see FEIS Chapter 4, pages 4-14 to 4-17, and 4-35 to 4-36.

**6. Effects of Grizzlies on Outfitters and Guides.**— Some people thought there would be no effect because so few grizzlies wouldn't interfere with outfitter expeditions, and others thought outfitters would see a positive benefit from clients paying to see a grizzly in the wild. They noted in other areas occupied by grizzly bears, people hire outfitters to take them camping and to see a grizzly bear in the wild. They thought this would happen in the BE, and would benefit the outfitter/guide industry. Others thought there would be a negative impact from access restrictions, and reduced business due to depleted game populations and fearful clients. A few outfitters were concerned about safety for them and their clients in bear occupied backcountry areas when game meat is present. Two respondents thought the DEIS did not adequately address the potential conflict and impacts to outfitters and guides. One person argued such a small population of bears would have no impact to outfitters, and suggested industry is making an issue of nothing. A few others saw a benefit from reintroduction in that outfitters would be forced to keep clean camps. One commentor thought grizzly bear recovery is more important than protecting outfitters' jobs, and felt if a conflict occurred, the bears should take precedence.

Most respondents were concerned about the economic impacts to outfitters and guides and local economies from various potential impacts associated with grizzly reintroduction in the BE. They felt the DEIS did not adequately address these impacts. Questions were raised about sanitation requirements...if bear proof containers would be mandated, who would pay for and install them, and maintain them in the numerous backcountry campsites. Outfitters commented they would have to purchase a lot of new equipment to meet safety requirements, and this would be an economic hardship that was not been addressed in the DEIS. Commenters listed numerous impacts such as trail closures, depletion of game herds from grizzly bear and wolf predation, and area closures for bears that could have negative impacts to outfitters and guides. One comment specifically addressed impacts to boating outfitters and how they would be impacted by sanitation requirements.

“IOGA (Idaho Outfitters and Guides Association) wonders what new restrictions would be placed on boating outfitters who move from river campsite to campsite during their guided excursions that feature dutch oven cuisine...will present aluminum and wood boxes used by boating outfitters be sufficient for storing and maintaining food on guided trips? Or does the USFWS plan to deposit government approved bear proof containers in the over 200 campsites associated with these river systems.”

“No doubt there will be additional costs associated with operating a hunting or pack trip business within the recovery area due to the necessity to obtain bear proof containers and other associated changes in operations. Where in the DEIS is this economic impact measured?”

*Response.*— Users of these public lands must apply common sense in hunting and recreation, and appropriate standards of storage of garbage and other attractants to minimize bear-human encounters. Such sanitation standards by users of public lands will benefit many other wildlife species and maintain the values of public lands, as well as benefitting grizzly bears. Management of water based recreation would be guided by the

CMC. Recreationists in areas occupied by grizzly bears do use bear resistant containers for storing bear attractants such as food. River recreation outfitting successfully takes place in other grizzly occupied habitat such as on the Flathead River in the Glacier National Park vicinity. Although a rare event, sometimes a trail or use area is closed to human use when occupied by a sow grizzly with her cubs. Economic impacts to outfitters and guides are discussed in the economics analysis in Chapter 4.

**7. *Effects of Grizzlies on Recreational Opportunities.***— A few people specifically addressed alternatives with respect to impacts on recreation. Comments regarding Alternative 1 mentioned the impacts to recreation activities from issues related to human safety. Most were opposed to Alternative 1 because they thought it would negatively impact access and recreation opportunities. People favored Alternative 2 because they don't want any negative impacts to recreation. Many comments favored Alternative 3 because people were concerned for public safety during backcountry recreation, and they don't want to change their current recreation activities for grizzly bears. Commenters supported Alternative 4 because people want to recover grizzly bears in the BE and want to see them in the wild, or just know they are there. They said they would be willing to deal with any inconveniences from grizzly bear presence.

Many respondents thought impacts to recreation activities in the Bitterroot Ecosystem would be minimal to nonexistent if bears are reintroduced. They thought such a small number of bears placed deep in the Selway-Bitterroot Wilderness would not disperse eastward into the Bitterroot Valley, and if one wanders that way, it would not cause trail closures. Most people commented they would be willing to adjust their habits in the backcountry, and to learn proper camping techniques in order to coexist with grizzly bears. One person commented grizzly bear reintroduction would greatly increase tourism and benefit local economies.

Some respondents thought grizzly bear reintroduction would significantly impact the nature of existing recreation uses in the BE, and thought the DEIS did not address the qualitative impacts to recreation experiences in the BE from things like sanitation orders, restrictions on trails, limited access, etc. They also felt the DEIS did not address the economic impacts to individuals from having to comply with sanitation orders. Many comments reflected a general concern for public safety during recreation activities in the BE if grizzly bears are reintroduced. Some people indicated they recreate in the BE because they don't want to have to worry about grizzly bears and their safety, and they want a wilderness area to recreate in that does not have grizzly bears. A number of comments made by river rafters relayed their concern that sanitation requirements in the recovery area would seriously impact their enjoyment of the river.

“With just a few simple steps, people can take precautions necessary to avoid conflicts with bears in the backcountry.”

“Here in California we receive \$80 billion per year based on international and national visitation to our state and national parks and forests. ...Tourism is sustainable and grizzly viewing (ex. Yellowstone) is an asset!! All wildlife, whether bison, wolves, or grizzlies bring in tourist money.”

“Tourism is the third largest industry in Idaho and plays an important role in Idaho County. This industry would be seriously, adversely impacted when hunters, campers, hikers, mountain bike riders, and berry pickers realize they could very likely encounter a grizzly bear. Most would find other places for outdoor recreation.”

Response.— There could be rare instances in which a grizzly bear is frequenting an area used by recreationists or other forest users where the safety of the people or the bear is at risk. In such cases, temporary closures of the area may be instituted until the safety risk is past. In the Northern Continental Divide Ecosystem, where a minimum population of about 325 grizzly bears currently exists, only one trail was closed on national forest lands because of grizzly bears in the last 10 years. This closure was a result

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of concerns for human safety when a bear was seen feeding on an elk carcass along a trail. During the peak of the visitor use season in Glacier National Park, fewer than 5% of trails are closed at any time as a result of safety concerns. Because of the difference between national park and national forest management, closures in the Bitterroot Ecosystem (which is mainly National Forest land) would be extremely rare and probably be similar to the Northern Continental Divide Ecosystem. Also, under the preferred alternative (Alternative 1), trail and road closures are not expected solely for grizzly bears at this time. And any trail, road, or area closure would be based on recommendations of the CMC, and their charge would be to minimize social and economic impacts from the management of the reintroduced population.

**8. *Effects of Grizzlies on Other Endangered Species.***— One commentor asserted the DEIS did not consider the impacts to ESA listed anadromous fish from the reintroduction of grizzly bears. They were opposed to Alternative 1 and thought bears should not be reintroduced given the current National Marine Fisheries Service directives to protect these listed fish. A few people supported Alternative 3 because they were concerned about impacts of grizzly bears on other listed species. Supporters of Alternative 4 thought this alternative would protect other listed species by protecting and restoring large habitat areas in the BE.

Most comments related concern for the potential negative impacts grizzly bears would have on listed salmon and steelhead in central Idaho. They felt the federal government is spending much effort and money to recover depleted anadromous stocks, and the grizzly bear is known to forage on these fish. There also was concern for the potential negative impact to gray wolves in central Idaho from grizzly reintroduction. Others questioned the NEPA process and thought the biological assessment of impacts from grizzly reintroduction to other listed species should be done after the final EIS is written and an alternative selected. One person suggested the USFWS should take a multiple-species approach to managing listed species in the BE, and not just focus on one species at a time.

“No reasonable consideration is provided in the DEIS to potential conflicts with salmon and steelhead recovery programs also being conducted within the area affected by the Proposed Action. In light of National Marine Fisheries Service (NMFS) decisions to issue “no incidental take” directives to many land management and land use projects and proposals affecting the recovery area and nearby land, it can be presumed that the NMFS “zero risk” approach to listed salmon and steelhead must be taken seriously...Any consideration of grizzly bear reintroduction should be ended until this apparent conflict is resolved.”

“Restoration efforts provided for by Alternative 4 would have multiple species benefits, rolling up roads in northern Idaho would have many watershed benefits, which would in turn benefit native salmonids.”

*Response.*— Appendix 9A contains the USFWS Internal Section 7 Consultation on impacts to other threatened and endangered species from reintroduction of grizzly bears. Appendix 9B contains the National Marine Fisheries Service Biological Opinion of impacts to listed salmon and steelhead from the proposal. Both documents conclude there would be no significant adverse impacts to other listed species from reintroduction of grizzly bears into the BE.

**9. *Effects of Grizzlies on Other Animals.***— There was some concern the reintroduction of grizzlies would cause population declines for a number of other wildlife species in the BE. Respondents felt the grizzly bear is a fierce predator, and would especially cause declines in game populations. Many commenters mentioned the grizzly bear is an indicator or umbrella species for other flora and fauna in the ecosystem. They felt if the ecosystem is healthy enough to support grizzlies (either through protection or habitat restoration) it would support all other species. Many supported Alternative 4 because of the habitat protection it proposes.

Other respondents were concerned about the impact to black bear populations in the BE from the reintroduction of the grizzly bear. One person thought there would be only minimal displacement of black bears by grizzlies, while others thought grizzlies would outcompete black bears for food and habitat, and would displace them to fringe habitats. One person was concerned specifically about grizzly bear depredation on spawning cutthroat trout.

“We do not need more predators to kill our elk, deer, livestock, salmon, steelhead, etc.”

“An important benefit of maintaining and restoring grizzly bear populations in the GSSE is that if protection of grizzly bear habitat is fully accomplished, the myriad of those other animal species finding important habitat in these federal lands will be served also.”

*Response.*— We believe our analysis of impacts of grizzly bears on other wildlife is accurate. Impacts of grizzly bears on other wildlife species will in some cases be compensatory, and some additive. See Chapter 4, pages 4-14 to 4-17.

## **ECONOMIC / SOCIAL**

**1. Spiritual / Cultural / Social.**— Comments stated the grizzly bear is part of our national heritage and therefore should be conserved for future generations. The presence of grizzly bears in the Bitterroot Ecosystem would improve the experience of some recreationists who visit the wilderness. Many people believed the grizzly bear would make the wilderness more complete. Some claimed the grizzly bear would degrade their experience in the Selway/Bitterroot area by increasing the risks to their personal safety, the safety of livestock and animals. Some people felt the government should not play ‘god’ and leave the bears to recover on their own accord. A representative of the Shoshone-Bannock people stated the grizzly bear ‘is part of the circle of life’. One individual spoke to the social significance of hunting and how it pertains to reintroducing the grizzly bear. Several individuals spoke of the importance grizzly bear reintroduction for future generations of humans. Some stated they felt it was important to replace the grizzly as a missing and natural component of the ecosystem; still others wanted to preserve the ecosystem as it is without the grizzly bear.

“The grizzly is a potent symbol of the American West...”

“More emphasis needs to be given to humans than animal species or habitat concerns.”

“Without bear, the landscape is poorer, as Camas and Bitterroot have declined, in the absence of the grizzly so too does wilderness. It's troubling to think that my grandchildren may not have the opportunity to encounter wild grizzlies.”

*Response.*— Many people commented on their values and how their spiritual, cultural, or social lives might be affected by the presence of grizzly bears. Native Americans, in particular, emphasized the importance of the grizzly bear to their traditional beliefs and culture. The USFWS recognizes many people have very strong values and emotions, both positive and negative, associated with grizzly bears. The actual presence of grizzly bears in the BE will affect the strength and intensity of these values but only with time, individual experience, and association with wild grizzly bears are these values likely to be significantly changed or affected by grizzly bear recovery.

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**2. Enjoyment of Grizzly - Watching/Knowing It's There.**— Some commenters felt there is an intrinsic value in having grizzlies in the Bitterroots. People do not necessarily need to see a grizzly bear; simply knowing the bear is in the area is good enough for some. Several said the idea of recreating in an area with grizzlies improves their quality of life as well as the lives of future generations. Some people disliked the DEIS putting a price tag on the bear and making it a commodity”; they felt this detracts from the wildness of the grizzly bear. One person felt bears have no intrinsic value. Comments similar to this issue are contained in the write-up for the issue, “Grizzly bear as a missing component of the ecosystem”.

“Furthermore, I know that many visitors to the Rocky mountain outdoors regard the presence of grizzlies and wolves as a special attraction, and are willing to seek out these experiences, and pay extra for them.”

“I have never seen a grizzly bear in the wild...at 83, I probably never will, but I still want to know they are out there.”

*Response.*— The USFWS understands and respects the right of people to form and hold their own personal opinion about how they might enjoy or not enjoy the presence of wild grizzly bears.

**3. Cost of the Program to Taxpayers.**— The majority of people who commented on the program were concerned with the high cost. They felt grizzly bear recovery is not a priority to them, and therefore any monies spent on bears is too much. They said it is a waste of tax dollars and a “fleecing of America.” Some people did not like the idea of spending tax dollars on grizzly bear recovery and made suggestions regarding their priority for tax dollar expenditures: deer and elk management, trail maintenance in National Forests, helping homeless people, education, unemployment, and balancing the Federal budget. Numerous comments were received about the economic analysis in the DEIS. Since there are no “real dollars” seen in the impacted local communities, people felt the DEIS was misleading to say that grizzly bears have a 40 to 60 million dollar value.

Some people made the general comment that they approved of their tax dollars being spent on grizzly recovery in the BE. Many people who were in favor of grizzly bear recovery supported Alternative 2 because it promoted the grizzly bear while not costing the taxpayer as much as the other alternatives. Many were concerned with the cost of alternative three; it would still “spend the money but remove any bears that might happen to be there”. Proponents of Alternative 4 felt tax dollars would be saved by eliminating below cost timber sales and associated road construction in the recovery area.

Some people were concerned about the long range funding outlined in the DEIS. They felt the estimated cost of reintroduction was underestimated and no long-term funding source was identified. Some feared the federal government would “drop” the recovery responsibility on the states of Idaho and Montana without adequate funding.

“The cost of introducing species into areas where they are not existing could better be spent in other areas of wildlife management, habitat improvement for existing species and feeding the starving human population in our country and the world. A million plus dollars per animal is excessive when you open your eyes to the world around you.”

“The cost implementation for all alternatives is completely erroneous. The cost of the wolf reintroduction program was well over four million dollars. The estimate of less than two million dollars for alternative 1 is unrealistic. The Draft EIS should include a complete and detailed budget of all costs involved in this program.”

*Response.*— We agree that adequate financial support is necessary to allow management and monitoring of bears. Wording has been added to stress that the USFWS should evaluate costs of recovery on an ongoing basis. The CMC would also be responsible for evaluating management costs and requesting additional funding to meet monitoring and management needs as required. The economic analysis in Chapter 4 has been revised and rewritten so as to be more understandable to the reader.

## **MISCELLANEOUS**

**1. *Need for Education.***— Respondents from all sides of the reintroduction issue saw a need for a comprehensive public information and education program. A frequent suggestion was to increase education on how to install sanitation equipment. Several felt a public education effort needs to be instituted prior to start-up in the local areas to increase public awareness. Interestingly, they believed the “other side” is the one that needs educating in order to swing them around to the “right” viewpoint. Those who favored reintroduction of the grizzly bear claimed education would help reduce the fear factor, help people understand the risks versus unfounded fears, and help alleviate misinformation regarding grizzly bears and their place in the ecosystem. Those against reintroduction of the grizzly bear claimed education would help others realize the idea is poor because they claimed the grizzly is not threatened and endangered. They called for more public education on bear safety and defending self, family, livestock, and property.

“The public information and education outreach program should extend beyond the one year ‘phase in.’ Provisions should be made to continue education programs and to adjust special sanitation equipment needs. An ongoing education program should be incorporated into state hunter safety programs, schools wildlife clubs and other community groups.”

“I think public education will be your best avenue, people always fear change and the unknown.”

“Sanitation equipment should be installed & education provided before bears have an opportunity to become dependent on human food.”

*Response.*— A proactive information and education outreach program has been added to FEIS Alternatives 1, 1A, and 4A.

**2. *Political Influence.***— The respondents who discussed this issue as it relates to grizzly bear recovery expressed widely divergent views. Many respondents at both ends of the spectrum conveyed their exasperation with the political system and the role it has played in determining the outcome of reintroduction. Several people in favor of grizzly bear reintroduction thought state politicians and local groups have hindered the reintroduction effort. Others also disparaged having politics instead of science be the guiding force in reintroduction efforts.

Many respondents reiterated their view that the political process has not worked to their advantage. Several individuals were concerned with the role the Secretary of Interior would play in the “political decisions” played out with the Citizen Management Committee. Most did not trust the Secretary to delegate responsibility to a group of citizens. A few people expressed their fears of “hidden agendas” by pro-grizzly advocates to “lock up the land”. Many respondents resented people or groups outside the local area having undue influence on bringing grizzly bears into an area in which they live. Several respondents mentioned they believe the Endangered Species Act is being misinterpreted. Numerous residents of Idaho stated they are amazed reintroduction of the grizzly bears is being “pushed ahead” when there is so much opposition politically from the elected officials within the state.

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“Much of the science about grizzlies is being ignored in favor of politics. Instead of knowledgeable wildlife biologists managing for grizzlies, a citizens committee will be in charge of management. Nominees of the Governors of Montana and Idaho will dominate this committee. How can one expect a citizen's committee of that political flavor to provide any reasonable recovery option?”

“I do not support a citizens committee on grizzly bears introduction, because as soon as the committee comes up with a decision on the grizzly bears it probably would be changed by the Secretary of Interior, Mr. Babbitt, or the people he works for.”

*Response.*— FEIS Alternative 1 has been modified to include a panel to reduce political impacts to the work of the Citizen Management Committee. A Scientific Review Panel of 3 would be appointed by the Governors of Idaho and Montana and the Secretary to review decisions and/or actions of the CMC and make recommendations as to whether they are leading to recovery. The CMC would have the opportunity to correct problems based on the Review Panel recommendations before the Secretary is notified. The Secretary of Interior must also confer with the Governors of Idaho and Montana before resuming management responsibility. This will serve to insulate the CMC from direct political pressure and influence. To assure scientific input in CMC decisions, two scientific advisors will be appointed to serve the CMC and to attend all meetings.