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To: Dr. Christopher Servheen
Fax #: 406-329-3212
Re: Comments on DEIS
Date: December 1, 1997
Pages: 3, including this cover sheet.

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Included in this fax are comments of the Grizzly Bear Legislative Oversight Committee on the DEIS concerning recovery of the grizzly bear in the Bitterroot Ecosystem. Thank you.

From the desk of...

Cindy Skidoway

Legislative Grizzly Bear Oversight Committee
1055 N 1700 E
Terracon, ID 83450

208-663-4585
Fax: 208-663-4428

Dr. Christopher Servheen
US. Fish & Wildlife Service
Bitterroot Grizzly Bear EIS
Box 5127
Missoula, Montana 59806

The Idaho Grizzly Bear Management Oversight Committee offers the following comments on the DEIS concerning recovery of the grizzly bear in the Bitterroot Ecosystem.

1. The language concerning the citizens management committee referred to in the preferred alternative needs to be strengthened and clarified to ensure its authority and legality. We recognize that Secretaries of Interior change periodically and are not necessarily bound by the actions or philosophies of their predecessors. The committee must be insulated from political pressure to enable them to effectively manage conflicts with humans. If the management committee is to be effective it must have access to the best scientific advice to address difficult situations which will arise. Some management decisions will inevitably be unpopular with one segment of the interested public or other, and pressures to over-ride committee decisions must be resisted if this approach to management is to ultimately succeed. It is essential that the citizens management committee operate effectively.

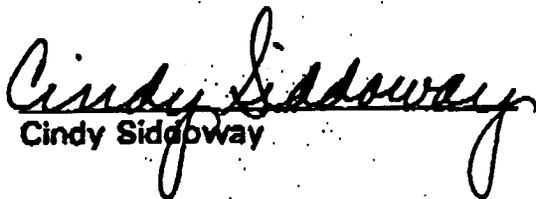
2. Experience with reintroduction of wolves indicates recovery may occur more rapidly than originally predicted, which has exceeded abilities of managers to address problems as effectively as would be desirable. The expansion of grizzly bear populations into previously unoccupied areas within the Yellowstone Ecosystem has also produced problems that have proven difficult to anticipate and manage. Adequate support for management of the recovery is essential and should be detailed more thoroughly in this document.

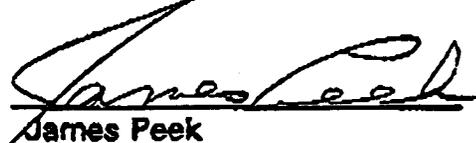
3. The recovery should be with bears that do not jeopardize the Yellowstone and Northern Continental Divide recovery programs, or other donor populations. However, the Bitterroot Ecosystem should not become a place to relocate bears that are trouble-makers in other areas.

4. The recovery area boundaries were established on socioeconomic grounds as much as on their suitability for bears. The southern portions of the Frank Church River-of-No-Return Wilderness and surrounding areas are near heavily used recreation areas in the Stanley Basin and livestock allotments. Given that boundaries have been adjusted from what was originally proposed for a variety of reasons, it seems appropriate to move the southern boundary to exclude the wilderness area east of the Middle Fork of the Salmon River and south of Big Creek, a major tributary to the Middle Fork. This still provides for a recovery area south of the Salmon River while reducing potential major conflicts with recreation and grazing.

5. We question the value of the economic analyses which are based on assumptions of questionable merit, such as an existence value. Such values

- 5 | are not equated with the costs of the projected lost jobs. Clarification of the economics is needed.
- 6 | 6. There is a distinction when dealing with livestock depredation on private land as compared to public land. Livestock appear to have priority on private lands while bears have priority on public lands. Also, requiring a permit to "harass" a bear that is attacking livestock on public land may preclude a guard dog from protecting a band at the time of the incident. These issues should be clarified.
- 7 | 7. The potential for a restored grizzly population to pose conflicts with recovery of anadromous fish and bull trout needs to be addressed.
- 8 | 8. The final EIS should incorporate all evaluations of grizzly bear habitat in central Idaho, which will include those of David Mattson and Troy Merrill.
- 9 | 9. The state wildlife agencies pick up expensive "unfunded mandates" while being involved in grizzly bear management, which should be recognized and addressed in the final document. This is especially critical in view of the diminishing revenues that are currently being provided for wildlife management at the state level. Provisions for providing federal support to the states for their involvement in the recovery are needed.
- 10 | 10. The biological reality is that we do not know definitely whether we can establish a sustaining population of grizzly bears in the Bitterroot Ecosystem or not. There is extensive uncertainty about whether sufficient numbers of appropriate bears can be successfully established, about the ability of the area to support bears, whether local fears and resentments as well as conflicts with humans and their property can be adequately contained. The citizens management committee may be the best way to address these problems. The recovery program is essentially an experiment, the results of which will not be known until well into the next century after the recovery program is initiated and bears are reintroduced. It is essential that adequate funding be provided for this program, which includes support for state obligations. Given the uncertainty, and substantial public interest and apprehension, provisions for a comprehensive public information and education program should be incorporated into the final document.


Cindy Sidaway


James Peek

Co-Chairs
Idaho Grizzly Bear Management Oversight Committee
30 Nov 97