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November 26, 1997

RECEIVED BY U.S. FISH
AND WILDLIFE SERVICE
GRIZZLY BEAR RECOVERY
COORDINATORS OFFICE.

Dr. Christopher Servheen
U.S. Fish and Wildlife Service Project Leader
Bitterroot Grizzly Bear EIS
P.O. Box 5127
Missoula, MT 59806

NOV 26 1997

Transmitted Via FAX: 406/329-3212

Dear Dr. Servheen:

I am writing on behalf of the United Paperworkers International Union to submit the following comments for the record on the draft EIS, *Grizzly Bear Recovery in the Bitterroot Ecosystem*. Approximately 2,000 of our members and their families live and work in or near the affected ecosystem, and your choice of a recovery plan could have a profound effect on their lives and livelihoods.

We believe the Citizen Management Concept put forward as Alternative One, and selected by you as FWS's Preferred Alternative is an important step forward in species preservation. The fact that your agency looks favorably upon a plan crafted by our members and other concerned citizens in the area shows that compromises that will both restore species and take full account of the *human* ecology of an endangered species issue are within the realm of the possible.

1 The UPIU recommends, therefore, that FWS choose Alternative One in the draft EIS, with the additional recommendations put forward by the Citizens Task Force in its comments of October 22.

Alternative One offers the best assurance of both restoring the species and protecting the lives and jobs of the people who live in the Bitterroot Ecosystem. Land use would not be significantly altered and economic activity including timber harvesting in the area could continue.

The restored grizzly bear population in the ecosystem would be declared an Experimental Nonessential Population and managed by a Citizen Management Committee (CMC) made up of local citizens. Therefore Alternative One will allow flexibility in dealing with human/bear conflict that would not exist were the local bear



population to enjoy the full protection of ESA as envisioned under both Alternatives Two and Four.

1 Management of the restored grizzly bear population by the CMC, provided it is sufficiently empowered, will allow local residents to have input into, and thereby build confidence in, the process of grizzly-bear restoration. It is simply a fact that, if local residents do not accept the bear, restoration efforts are likely to fail.

For these reasons, and because the CMC plan holds out hope of a possible model for avoiding the extreme alienation and long knock-down, drag-out battles that have poisoned many other endangered species issues, the UPIU believes that Alternative One, if adopted as recommended above, has the best chance of resolving the debate about grizzly bears in the Bitterroots in a way that is beneficial for all concerned.

Thank you very much for this opportunity to comment.

Sincerely,



Keith D. Romig, Jr., Ph.D.

UPIU Environmental Policy Advisor