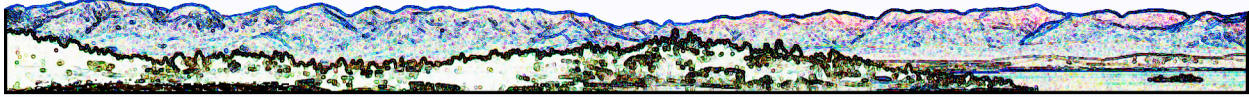


# Swan View Coalition

*Nature and Human Nature on the Same Path*



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July 31, 2013

NCDE Conservation Strategy  
USFWS  
University Hall, Room 309  
Missoula, MT 59812

Re: Comments on NCDE Conservation Strategy  
Submitted as PDF to [NCDECS@fws.gov](mailto:NCDECS@fws.gov)

Dear Dr. Servheen and others at FWS;

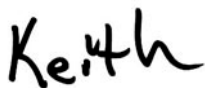
Please enter this, our second letter on the Draft NCDE Grizzly Bear Conservation Strategy (hereafter "CS"), into the public record.

Yesterday we submitted our detailed comments on the CS. We have since been able to review the comments being submitted by Natural Resources Defense Council.

We hereby incorporate by reference into our earlier comments those being submitted by NRDC, with the following clarifications made to avoid any confusion:

1. As discussed in our letter, we believe science and the precautionary principle dictate at least 5,000 bears be included in a well-connected metapopulation in the Lower 48 States, rather than 2,500-3,000.
2. As discussed in our letter, the development of habitat-based recovery criteria (HBRC) must precede a draft CS, not just the final. Otherwise, public review of a draft CS is hamstrung by the absence of HBRC upon which recovery is being based.
3. While our letter notes the need to develop HBRC that contends with habitat quality and bear foods, NRDC's letter provides a more detailed analysis in this regard and numerous others that we fully support.

Sincerely,



Keith J. Hammer  
Chair