June 16, 1997

Dr. Chris Servheen
Interagency Grizzly Bear Coordinator
U.S. Fish & Wildlife Service
NS 312 University of Montana
Missoula, MT 59812

Dear Dr. Servheen:

We provide the following summary of some of the main points we will be discussing at the June 17 Bozeman recovery plan meeting on grizzly bear habitat needs. We write these comments in view of the urgent need for habitat protection for the grizzly and the very real risk of losing the remaining populations in the lower 48 due to habitat loss. Time is of the essence; and action can and should proceed with current information.

There are compelling reasons for the U.S. Fish & Wildlife Service to adopt a conservative approach in managing the Yellowstone grizzlies. Grizzlies in the lower 48 states have been isolated in small habitat islands, occupying now 2% of their former range. These remnant, postage-stamp populations are at great risk of extinction. The grizzlies of California, Mexico and the southern Rockies made their unsuccessful last stand in small isolated habitat islands, not unlike Yellowstone.

1. The grizzly's primary habitat is wilderness: that is, areas of low human presence. The national forests outside Yellowstone Park include expanses of roadless, wild country, and high-quality, grizzly habitat, which are unprotected and vulnerable to development. For grizzlies to survive into the future, as much roadless land as possible should be protected in Greater Yellowstone.

2. The current recovery zones are too small to recover the grizzly. Further, as presently drawn, the recovery zones do not include high-quality, secure habitat where the grizzly could again colonize. Remaining roadless areas in the Greater Yellowstone outside the current recovery zone should be protected as roadless, including lands in possible linkages between Yellowstone and other ecosystems.

3. The revised recovery plan should minimize adverse human-bear interactions, for the sake of both bears and people. Much is known about the effects on grizzlies and grizzly survival from road building and other kinds of developments. And much more could be learned from analysis of data that have already been gathered. In the revised grizzly bear recovery plan, roads and other developments should be minimized and managed so as to avoid negative impacts of humans on grizzly habitat through limits on road and trail densities and other measures.

4. Habitat must be managed and restored, so the population can grow and flourish. There is universal agreement among scientists that, to assess the status of a rare species, one must know its population size, and population growth rate. Grizzly habitat recovery criteria (i.e. critical road density limits) must be set to ensure that the population size will be adequate for recovery, and that the population will be stable or increase to healthy levels.

5. In Yellowstone, there is a variety of important, seasonal grizzly bear foods which require special protection. These include whitebark pine nuts, ungulates (especially winter-killed elk and bison), cutworm moths and spawning cutthroat trout. Grizzly recovery depends upon maintaining stable or increasing abundances of these foods and assuring secure access (i.e. little human disturbance). Recovery will also require ensuring that grizzlies can forage at the appropriate times with minimal interference from humans.

6. New ways of monitoring and measuring the quality of grizzly bear habitat over time are available, relatively inexpensive and of critical importance. Monitoring demographic features of the population alone is not adequate, because of the uncertainty associated with these measures, and the time lag between habitat destruction and when population declines can be detected. Monitoring habitat is possible through the use of key indicators, such as roads and road densities, human populations and settlement patterns, as well as critical foods, such as whitebark pine and cutworm moths.

In sum, years of research on Yellowstone and other grizzly ecosystems have provided clear pathways to address habitat issues in the revised plan. We do not need to wait for new information to be collected before moving forward.

We look forward to continuing today's dialogue with you in pursuit of habitat protections that will truly recover the grizzly. We offer our assistance in the revision of the recovery plan, and would be happy to meet with you to discuss these issues and our separate comments in more detail.

Sincerely,

Dr. Barrie Gilbert, Utah State University

Dr. Lance Craighead, Bozeman, MT

Dr. Craig Pease, University of Texas

Troy Merrill, U.S. Fish & Wildlife Coop Unit, Univ. of Idaho.