Scoping Comments for the Bitterroot Ecosystem Grizzly Bear Recovery EIS

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Summary of the Previous Recovery Effort

I helped develop the Bitterroot Recovery Plan Chapter and the Draft EIS as the primary cooperator representing Idaho Dept. Fish and Game from 1988 through the completion of the EIS in 2000. I oversaw the IDFG statewide wolf and grizzly recovery efforts from 2002 until 2009 and continued to participate with the Bitterroot Subcommittee. In retirement, I still provide outreach to the public on my book and give presentations on the Bitterroot recovery efforts, a continuation of my 35-year effort at Bitterroot grizzly bear recovery. Recently, I provided the Idaho Conservation League with insight and direction for their Bitterroot recovery input and position statement, and participated as their guest speaker on their Bitterroot grizzly webinar.

During that initial recovery effort, we recognized a new approach to endangered species recovery. The EIS proposed reintroducing grizzly bears within the Wilderness as an Experimental Nonessential population, with management authority designated to a Citizens Management Committee (CMC). The states of Idaho and Montana were to have day-to-day bear management responsibilities with guidelines from the CMC. The proposal was innovative in three main ways:

1) *A CMC was proposed*. A citizen's *advisory* committee was not uncommon, it was working in the Cabinet Yaak Ecosystem. However, a Citizen's *Management* Committee had never been tried. The FWS and partners designed a CMC with a selection protocol and directives for the CMC to recover grizzly bears as the primary goal. The premise for the CMC was to provide local interests and citizens with management authority and responsibility rather than the usual oversight and management by state and federal agencies.
2) *Reintroductions under ESA Sec. 10(j) as a Nonessential Experimental population*. Similar to the way wolves had been successfully reintroduced, the USFWS believed grizzly bears could also be recovered with more flexible rules provided with a nonessential experimental population.
3) *Reintroductions in Wilderness only.* As part of the recovery proposal, the USFWS proposed to reintroduce up to 25 grizzly bears over a 5-year period. However, reintroductions and primary grizzly recovery effort were to occur only within the designated Wildernesses of the Selway-Bitterroot, and Frank Church River of No-Return. This was a primary requirement of the timber industry representatives in the ROOTS group designed to reduce or eliminate the potential impacts of grizzly bear management on timber harvest.

Where the proposal failed was the lack of support by the public, agencies, politicians, and most importantly I believe, within the majority of the environmental community. The public supporters of the

proposal were in a coalition of environmental and timber groups, namely the Defenders of Wildlife, and the National Wildlife Federation, and a group of pragmatic timber industry representatives. Together they developed what was called the ROOTS (Resource Organization on Timber Supply) proposal, which with some adjustments eventually became the preferred alternative. The proposal was a different way of doing things, more of a compromise than an all-or-nothing approach that the coalition of Conservation Biologists preferred.

The Conservation Biology coalition was composed of scientists and other environmental groups. They preferred the fully threatened status with a larger recovery area and improved linkage corridors from adjacent recovery areas. Versions of both of these proposals were included in the draft and the final EIS. Along with those we had a no action alternative, which was basically a natural recovery, and a no bear alternative, which the FWS determined was really not recovery and therefore not legal.

The war for grizzlies had many fronts. Initially, the politicians were willing to listen to the coalition of the ROOTS proposal, stating that they were intrigued with the compromise approach. As a result, the agencies thought the proposal had legs and supported it. Local timber and other groups initially signed on, with the stipulation that they didn't want any grizzly bears but "If grizzlies were to be introduced, this was the best alternative". However, the other environmental/conservation groups never fully coalesced behind the ROOTS proposal. Once the environmentalists and scientists organized and presented an alternative called the "Conservation Biology Alternative" (CBA), the ground was set for conflict among the supporters of bear recovery. Consequently, the Clinton administration who supported T&E recovery as evidenced by the reintroduction of wolves in 1995, was at a loss as to which alternative to support. They eventually fell in line with the FWS and Dr. Chris Servheen's (the USFWS recovery coordinator) strong support and alignment with the ROOTS proposal. This did not sit well with the CBA biologists and activists. One of the ROOTS organizers stated that if the bear biologists couldn't agree on the path forward, then what chance would there be for everyone else to agree? Eventually, the support eroded even among the state and federal agencies who initially supported the ROOTS proposal. A new governor in Idaho, Dirk Kempthorne, along with the majority of the legislature, were adamantly opposed to grizzly bear reintroductions. Consequently, the Fish and Game commission eventually opposed reintroductions and supported a natural recovery - the no action alternative. The USFWS preferred alternative became a version of the ROOTS alternative, and the Clinton administration signed the record of decision (ROD) shortly after the election in November 2000. The USFWS had bent over backwards to listen to all the complaints and suggestions and incorporated the concerns from the local publics and politicians. In effect they were saying "see, we hear you, we can do this with little impact to your lives – grizzly bears don't have to be a big deal".

Then came the Bush Administration's support for Idaho and Montana politicians' and governor Kempthorne's opposition, and in June of 2001, Secretary Norton changed the NOI to one of natural recovery. The new NOI was posted in the federal register, and of the thousands of comments received, 98% of them were opposed to the natural recovery proposal and mostly supported the CBA alternative, or to a lesser degree, the ROOTS alternative. But a new or different ROD was never signed. Consequently, today the ROOTS alternative is still the only rule in the books.

This, of course, is all well known by the USFWS and is well documented, including in my book, *Journey of the Bitterroot Grizzly Bear*. However, I thought I would review it for the reader as someone who

witnessed it first hand, and also to provide an Idaho background to readers not versed in the history of the recovery effort. *Those who don't know history are doomed to repeat it*.

Remember this: If alternative 1 had been implemented in 2000 or earlier, we would now have a population of grizzly bears in the Bitterroots.

Scoping comments

Currently, there is an ongoing push from states to delist grizzly bears in the NCDE and the YE. Idaho has gone a step further and wants them delisted everywhere, including in the Bitterroots where there currently is not a recovered population, or any resident population at all that we are aware of. We are only aware of multiple grizzly bears in and around the recovery area, at least one male that denned in the BE, but no females with young. Consequently, because of the state actions, it appears there are "inadequate regulatory mechanisms" in place to secure the success of recovery unless they remain listed. This is a ludicrous stand by the states who proclaim they are good stewards of the resources, but are failing to show intent to manage a recovering population. Because of the lack of desire to protect grizzly bears outside of NCDE and YE, they should not be trusted to manage grizzly bears as a delisted species. I worked for 30 plus years to recover grizzly bears so the state of Idaho could manage them. I have changed my mind. Under current political pressures from the legislature and governor, IDFG no longer has the independent ability to properly manage grizzly bears the way they know how, and more importantly the way they should.

I think there has been a lack of effort on the Idaho side to confirm grizzly bear activity within the Bitterroot Ecosystem (BE). For proof, one only needs to look at the USFWS map of verified observations that seem to end at the Idaho/Montana borders along the eastern front. Almost all the observations end at the line (Figure 1). A grizzly bear will not identify a political boundary, but humans, biologists, and politicians do. This is also evidenced by the lack of support by Idaho to the USFWS to conduct the DNA research in Idaho. Also, the only thing Idaho seems to be doing is following up on hunter reported observations or perhaps hunter trail cam photos when reported to them. In addition, IDFG claims the hundreds of trail cams being placed by IDFG to count wolves and elk should be sufficient to identify any grizzly bears roaming the forests.

In theory, this sounds good. However, grizzly bears are different beasts than wolves, and their behavior is also different. Research shows grizzly bears tend to avoid roads (camera locations) to avoid conflict, and in fact subadult males have a 50% survival rate with road densities above 1.5 mi/sq mile. The fact there are so few grizzly bears in the Bitterroot confirms there is low chance of random camera encounters without bait. If Idaho really was interested in identifying grizzly bears, they would support the USFWS to conduct DNA research here. IDFG cooperated with the USFWS to conduct grizzly camera studies in the Bitterroots in the early 1990s, and again in 2008-2009, and should be once continuing research with the USFWS now that bear movements in the area are common.

Black bear bait stations appear to attract grizzly bears as well as black bears. Many of the verifications to date show grizzly bears on trail cams at black bear bait stations. However, those hunters placing trail cams at their bait stations may be reluctant to report grizzly bear observations and photos for fear of

having their hunting area closed down, or inundated with grizzly bear enthusiasts. Case in point: in 2019, when I was writing my book on the Bitterroot recovery effort, a Montana bear biologist had heard from an Idaho outfitter that he had photos of grizzly bears in Idaho over bait well before radiocollared bear 927 was in the area (which he also photographed over bait). I contacted the outfitter to see if I could obtain a photo for my book. He told me that he did not want to provide me the photo, because he was sure my thoughts on grizzly recovery and his were 180 degrees different. I am sure this belief and attitude is held by the majority of bear hunters and outfitters in northcentral Idaho – they fear the state or feds might shut down bear baiting because of grizzly bears. Another outfitter, who actually was responsible for killing a grizzly bear in upper Kelly Creek also refused to discuss grizzly bear activity with me for my book. I also heard from many hunters when I was working for the state. When we looked at photos and asked questions to identify a grizzly vs. a black bear sighting, they often stated "I saw a grizzly bear and if the Fish and Game doesn't believe me, then screw them, I'm not reporting them anymore". Potential grizzly bear observations are going unreported due to either lack of support for recovery, or lack of respect and trust of state and government officials. Human nature hasn't changed.

So, what is the big deal about knowing if we have grizzly bears as residents in the BE?

For one thing, the last director of IDFG, the governor, some current state and IDFG staff and many others are adamant that central Idaho should not be a recovery area, and state matter-of-factly that "if it was good grizzly bear habitat, then grizzly bears would stay". Also, if the USFWS were to once again propose establishing an Experimental Nonessential population, legally they could not assign that designation where a population of grizzly bears currently exists (population definition includes breeding females). So, knowing if bears reside in the recovery area would be important knowledge for recovery efforts on both sides of that issue. Based on our current knowledge, the USFWS has agreed that no population or even resident grizzly bears currently exist within the Bitterroot Ecosystem. However, that may be in error.

In June 2019, a grizzly bear was photographed on a black bear bait station near White Bird, Idaho, way outside of expected grizzly recolonization areas. At about the same time, a different grizzly was photographed 20 miles away near Newsome Creek, also on a bait site. I believe that because the first bear was photographed in June so far from the Selkirks from where it originated (as verified by DNA), while snow was still prevalent in many of the likely travel corridors, that the grizzly could have been a resident of the Bitterroot Ecosystem and had denned close by during the winter of 2018-19. Fast forward to April, 2020, and a grizzly bear track was verified by IDFG in the snow near Snowhaven ski hill near Grangeville, just a few miles from where the grizzly was photographed in June the previous summer**.** ***It is almost a given that bear had denned at least once if not twice in Idaho, hence a "resident" of central Idaho.*** In April, 2020, a few days after hearing about the tracks, I visited the site where the tracks had been found and began looking for bear sign. I saw dozens of bear hunters cruising the road in 4 wheelers with bait, hounds, and rifles. If a grizzly bear had been in the vicinity, his chances of survival were greatly diminished. My guess is that people knew the bear was there due to the extensive media coverage, and perhaps it was not very welcomed. If they killed the bear by accident or on purpose, they likely would never have reported it. To my knowledge, that bear has not resurfaced since then.

The question is, what have we done to prepare central Idaho for natural grizzly bear recovery? What have we done to assure grizzly bear survival in Idaho under the default "natural recovery" situation that

followed the failed implementation of the FEIS preferred alternative in 2000? The states and federal agencies have worked under a natural recovery scenario for nearly 24 years, but what still needs to be done to secure the recovery of grizzly bears in the Bitterroots?

Actions needed for grizzly bear recovery in central Idaho

Of the 5 factors for listing or delisting a species, I believe we have issues with the following:

1. Threatened destruction, modification, or curtailment of species' habitat.
    a. Increased timber production and roading planned in the Clearwater/Nez Perce forests
    b. Increased human development surrounding the recovery area within travel corridors
2. Inadequate existing regulatory mechanisms.
    a. The states are not willing partners in recovery of the BE as evidenced by their petition to delist all grizzly bears in Idaho and immediately implement a hunting season
    b. Game regulations that do not protect grizzly bears such as baiting, snaring, no required ID training, and a lack of desire to emphasize that grizzly bears may be present in areas where they have previously been verified, thus potentially allowing a taking under sec 9 of the ESA
3. Other natural or manmade factors affecting its continued existence.
    a. The lack of underpasses and overpasses and protected corridors for grizzly bear travel particularly along I-90 preclude or diminish potential for natural recovery and potentially cause a mortality
    b. Lack of support for grizzly bear recovery by the political establishment

The 2000 ROD for a 10j population, citizen's management committee, wilderness-only alternative was tried and failed to garner sufficient support to be a successful recovery alternative in 2000. Public, agency, and political support in Idaho has not changed even 24 years later. If anything, it has become more antipredator. Because a new EIS is needed prior to implementation of the old ROD or a new one, we need to consider alternatives that may have a better chance of public and agency support, as well as grizzly bear recovery. Public and political feelings about grizzly bears have not changed in Idaho enough to create a groundswell of support for the old ROD, or perhaps any recovery alternative. However, that in itself will not prevent bears from continuing to move in and around the central Idaho wilderness and designated recovery areas, and perhaps establishing a population over the long-term should they be allowed to survive. Grizzly bears and the courts will continue to demand we do something.

Following are some ideas for recovery:

1. During the first recovery effort that in effect ended in 2000, many public and agency staff believed that a natural recovery effort might gain more support. Many publics seemed to believe that bears that made their way to central Idaho past the gauntlet of human and wildlife caused mortality without conflict deserved to be here, and we could learn to live with them. Of course, for many agencies, the idea was a relief because leadership did not have to make immediate decisions and could, in effect, kick the can down the road to new leadership. For the general public that meant many years in the future to worry about grizzly bear activity in their

backyard. Fast forward to 2019, and grizzly bear activity has been verified in and around the initial recovery area boundaries in Idaho signifying that decisions about recovery could not continue to be put off way into the future. *Natural recovery with enhancements for movement and survival could work well for recovery.*

2. Grizzly bear males tend to be the sex most likely to disperse and pioneer new habitat and home-ranges. Grizzly females tend to establish home ranges adjacent to their mother for protection and a portion of the established home range. Therefore, female migration tends to be slower and more methodical. Wayne Kasworm (USFWS) postulated in the 2000 EIS it would take more than 50 (now 25) years for females to arrive in central Idaho from the Cabinet/Yaak population given this behavior. Perhaps a female may travel with a sibling into new habitat such as the Lolo bears did last year. They were relocated to the Sapphire mountains to preemptively avoid conflicts and the bears eventually moved back north. Or perhaps females move on their own after some conflict or habitat changes within her home range, such as the bear called Ethyl. Whatever causes females to migrate, it typically is much slower than for males. When males migrate, they are not only looking for open and available habitat, they are also looking for other bears, particularly females. Young males often migrate to avoid conflicts with older males and to establish their own home range. They are looking for females that are available for breeding. If none are in the new habitat they have pioneered, they will likely return to their old haunts once they reach reproductive age. So, when people say "if bears liked the Bitterroots they would stay there", they are pontificating that the habitat is not suitable, and are not considering the behavioral biology of grizzly bear males and females.
3. If a population is to be established under natural recovery, a couple of "anchor females" could enhance recovery. As stated previously, males are looking for females. Grizzly bears traveling and migrating leave spore, rub posts, urine, and other scents along the way, thus creating a travel route that can be followed by succeeding bears. Other bears will follow those scents realizing that a grizzly has been there. Although bear relocations have a low chance of success overall with bears that have established home ranges, younger bears without home range fidelity have a higher likelihood of success. This is perhaps even more important for females. I believe a couple of young females should be released into north central Idaho in prime habitat to attract males to the area. Female spore and urine could be left along known and safe travel corridors, including safe underpasses along I-90, or along drainages (e.g. Fish Creek, Blodgett, etc.) leading from the Bitterroot valley into the Bitterroot recovery area, thus flagging a trail to central Idaho.
4. There has been very little done to secure grizzly bear survival once they arrive in central Idaho. The needed changes to state management are not a secret, but are difficult for some to agree to. I proposed these needed enhancements to Idaho's wildlife management for decades while working for them, and they feed directly into the "adequate regulatory mechanisms" requirements under the ESA. Instead of concern for grizzly bears, the opposite has been espoused by the state. Unfortunately, they have doubled down on bear baiting, wolf snaring, and trapping, and avoiding mandatory bear identification efforts for bear hunters and baiters in most of Idaho. Where current populations exist in the Selkirks and near Yellowstone, some rules exist to reduce mortality of grizzly bears, e.g. no baiting. In some other areas, rules provide some effort to reduce catch of non-target species. IDFG wants people to trust their

management but continue to show the public they don't much care about grizzly bear survival in central Idaho and outside of occupied habitat they are currently attempting to delist.

But the disdain for recovered populations does not just lie within the Bitterroots. It only took a short time for the states to support a grizzly bear hunting season the last time they were delisted in the Yellowstone Ecosystem. If the state of Idaho wants people to believe that they truly care about grizzly bears and to trust their management, the absolute worst thing they can do is propose a hunting season immediately upon delisting. The best thing they can do is refrain from hunting for a minimum 5-year post delisting period, and then only provide a permit where there are livestock or high conflict issues due to population pressures. A hunter could take a bear in a control action instead of the USDA Wildlife Services or IDFG.

I believe the politicians and some anti-predator groups in the state of Idaho are pressuring the Idaho Fish and Game commission to not fulfill their obligations under state law to preserve, protect, perpetuate, and manage <u>all</u> wildlife for the benefit of the people of Idaho, and to partner with the USFWS on all TE recovery efforts. The Idaho predator control board spends hundreds of thousands of dollars annually to control wolf populations with little or no positive results for livestock or big game. The state only seems to be interested in delisting current populations of grizzly bears, and continue to oppose grizzly bear reestablishment in central Idaho. Unless the state becomes a willing partner, delisting will likely never happen.

Thus, any proposal for enhanced corridor and recovery effort would have to be made with promises from IDFG for enhanced effort to protect grizzly bears in central Idaho, or it needs to be done without them similar to how wolves were initially managed. I believe the state and grizzly bears would be much better off if IDFG is allowed to manage grizzly bears as a valued species, rather than being managed by the courts or legislature. But they need to begin by not treating large carnivores only as vermin that impact livestock and ungulate populations.

After all these years, grizzly bears have decided to move back to the Bitterroots on their own. The least we can do is help them survive once they get here, quit fearing them and the perceived baggage that surrounds their management, and just let them be bears. Bears are very flexible and adaptive, apparently more so than we are-- and we are supposed to be the smart ones.

5. **Issues (inadequate regulatory mechanisms) that need to be addressed to protect bears in and near the Bitterroot and other Ecosystems:**
    a. Protect grizzly bears by reducing impact of incidental catch by wolf traps and snares by closing snaring during bear active seasons e.g. March 1 -Dec 15. Do not allow snaring for wolves around carcasses.
    b. Require passing mandatory grizzly bear ID courses for all bear tag holders including sportsmen pack holders. This will instill caution as well as knowledge that bear ID is difficult, and that grizzly bears may be in the area you hunt. Combined, these may reduce mistaken identity mortality.

c. Include grizzly bear ID signing at trailhead and roads in all of recovery area and adjacent big game units, and advertise/warn that grizzly bears may be encountered.
d. Increase the number of big game units in the big game regulations that have the caution: "grizzly bears may be encountered", to include those units that have had verified sightings, as well as adjacent units including GMUs 14, 15, 16, 16A, 21, 21A, 28, 30, 30A, and others as more information comes in and grizzly bear activity has been verified. A quick look at the verified sightings in Montana will help identify units in Idaho that may have grizzly bears adjacent to them.
e. Consider emergency closures for black bear hunting in areas with grizzly bear females and cubs until a minimum viable population is established. The death of a single female grizzly bear during early recovery is tantamount to recovery failure.
f. Eliminate or restrict bear baiting in known corridors and expected and occupied grizzly bear areas to protect bears and hunters.
g. Require food storage orders in corridors, likely grizzly bear areas, or where they have been confirmed in recent past.
h. Provide bear resistant containers for recreationists, and require them of outfitters.
i. Confirm that state agencies agree to provide assistance for grizzly bear management and will support grizzly bear recovery in the Bitterroots. They need to do this by reducing as much as possible potential impacts to grizzly bear movements within travel corridors between occupied habitat. They need to remove threats to bear survival such as wolf snaring, hound hunting, baiting, etc.. If they cannot commit to these simple and logical changes to rules, then they should not be trusted to manage a delisted population of grizzly bears. The courts will make note of the rules in place to protect grizzly bears. The USFWS should consider contracting with the Nez Perce and other native tribes interested and capable of assistance for grizzly bear recovery in the Bitterroot ecosystem within the aboriginal and treaty rights area of central Idaho. Also, consider establishing a FWS presence for bear management in Idaho.

6. Issues (threats to habitat and other manmade factors) that need to be addressed to enhance natural movement to the BE:

a. Identify used and likely travel corridors across/under major highways, and enhance underpasses by cooperating with Idaho and Montana transportation departments.
b. Enhance DNA monitoring along travel corridors from north Idaho and western Montana to central Idaho, as well as within the BE evaluation and recovery area.
c. Enhance outreach to provide responsible "living with bears" information and outreach to better understand bear biology, behavior, and management.
d. Identify known road density maximums for grizzly bears, and address these in the recovery area by implementing seasonal closures as well as road recovery and restoration in bear corridors, and where grizzly bears are active.
e. Provide timber harvest guidelines and Sec. 7 consultation to enhance quality bear and ungulate habitat, use prescribed burns and other habitat restoration and enhancement efforts for grizzly bears.

f. Consider providing natural bear movement enticements in addition to protecting corridors such as: 1) augmenting the migratory grizzly population by introducing an "anchor" female or two, and 2) providing a "scent trail" by placing natural or artificial scents, spore, urine, hair/gland, etc. of female and male grizzly bears through safe corridors to encourage movement into central Idaho from known populations.
g. Provide supplemental natural foods for migratory or resident bears while a population is being established and especially if a female is relocated into the recovery area. Foods such as roadkill elk and deer, salmon and steelhead carcasses obtained from hatcheries, etc. would be ideal. These foods are not to replace other naturally occurring foods, but they would be designed to provide bears with additional enticement to stay following a relocation or extended migration. It takes a while for a bear to learn a new home range and where and when foods are available. These are often learned from the mother during the 3-year period with her prior to dispersal. A bear from a different ecosystem or ecoregion will take time to learn and adapt to a new one and new foods. A grizzly bear is primarily concerned about gaining weight and survival, and secondarily about mating. Providing these opportunities in central Idaho to help initiate a population will enhance recovery efforts.

7. Issues to be addressed to appease local and political concerns:

a. The number one issue that is always raised by the public is fear. Fear of injury, fear of impacts to recreation, fear of impacts to commerce and natural resource extraction. Fear is mostly a result of the unknown and the fact that grizzly bears on rare occasion cause injury. In a dense and recovered population similar to the NCDE and the YE, injuries are very rare. They are most common (but still rare) when human behavior is unpredictable. This needs to be a topic for the public to understand. Human injuries inflicted by bears within parks are most often the result of surprise encounters in low-use trails or in off-trail situations. When bears are surprised at close quarters, they at times can act defensively as they attempt to alleviate a threat to themselves or their young (Nadeau M.S. thesis, Univ. Montana, Missoula, 1987). Outside the parks, injuries are often the result of hunters or recreationists inadvertently surprising a bear on a carcass or bedded down in dense timber or brush. These are often short encounters that may result in serious injury but seldom result in death to the hunter or hiker. Bears almost never injure people along roads or heavy use areas where human behavior is predictable (case in point, bear 399). Injury is rare even when humans have created an attractant and caused the bear to become food-conditioned. Even food conditioned bears rarely if ever attack humans, but avoiding causing this behavior is safest for bears and humans.

However, any chance of injury or death is often claimed to be too much of a risk for some individuals, and thus creates opposition to reintroductions and recovery. There is no easy solution for overcoming these fears or how publics and politicians react to them. The only way I have found that works is for an individual to have a positive emotional experience concerning bears. Humans, like animals, can habituate to a threat if after

repeated encounters they don't have a negative experience. Creating positive emotions that are based in fact and information or experience is the best way to change one's mind, because for most people emotions are what formed an opinion to begin with (think about how often you've read or seen gory stories on grizzly bear attacks). Statistics on bear injury rates will seldom help when an individual is thinking about grizzly bear encounters, for the same reason people buy lottery tickets—they don't understand statistics and probability. In my book "*Journey*", I deal with this issue by providing a sympathetic character for the reader to care about -- BB the Bitterroot bear. Once the reader understands the trials and tribulations of a young grizzly bear learning how to survive the gauntlet of threats and eke out a living on his way to adulthood, the reader is carried away from fear and moved toward understanding and greater appreciation, if not total acceptance of grizzly bears. My public presentations are factual and address people's fears head-on by acknowledging fear is normal, relaying personal experiences with grizzly bears, and providing alternative thoughts and narratives with a few book excerpts to evoke positive emotions. I believe outreach like this is the only clear way to affect how people think about grizzly bears. The only other way is experience. Once people have experience around grizzly bears, they begin to lose their fear of them, and begin to respect and adapt to them.

b. Address some lingering habitat concerns by using Idaho ecological region mapping and identifying soil, moisture, and vegetative qualities that are most amenable to grizzly bear habitation. There has never been a black bear study in the recovery area that would identify seasonal use patterns and bear food preferences throughout the recovery area. We have mostly used habitat studies and availability of bear foods via satellite imagery and resource selection modeling which is a very good start and probably adequate for now. They all show adequate bear foods for grizzly bear recovery. However, determining how black bears use an area can sometimes be helpful in determining what foods are available for grizzly bears during different seasons, and is a good way to ground-truth the models. This might provide a good master's thesis.

c. Create a citizens advisory committee to establish dialogue with local citizens prior to recovery efforts, similar to other ecosystems.

d. For some people, addressing fears of government regulations will allow for more reasonable discussions. Forcing new rules like baiting and snaring restrictions upon a hunting public that is used to the current system, is likely to be problematic. However, addressing the facts about why this needs to be done, the fact that some rules may only be localized and temporary, and that the public is a partner in recovery by providing protections for the bear through an advisory committee, may prove helpful.

e. Can we improve public support for recovery perhaps by incentivizing public observation reporting? Maybe the state/feds or conservation groups could establish incentive with a reward for reporting. An online report form with an option to download photos and willingness to verify site would lead to a reward. Perhaps "adoption" of bears where

locals will get paid for keeping bears alive by employing range riders and using non-lethal techniques for bear aversion. Assure that ranchers will be reimbursed for their verified losses. Environmental groups can assist in this endeavor.

f. Providing strong and unified support from the conservation groups will be important, as will any support we can gather from the natural resource industry. Using government supported outreach efforts that are science based will help, but they have to be media-savvy, and include members of the public, environmental, and industry supporters. Unfortunately, 99% of the outreach that actually connects with people is about grizzly bear maulings because it reinforces their innate fear. A short peruse through books available about grizzly bears on Amazon will prove this. Books and articles about maulings or observations and musings about grizzly bears that are location-based and highly biased toward the writer's views are what is mostly available and sell the best. Unfortunately, gore sells. This has to be acknowledged and diverted but not dismissed.

In summary, there probably is little here that hasn't previously been discussed among the current team of USFWS professionals and the recovery team. I have great faith in Dr. Hilary Cooley and her EIS team as they try to find a path forward through this quagmire. I hope that the Bitterroot Ecosystem Subcommittee and the IGBC has courage to move this effort forward. I have respect for current and former staff of all agencies who have previously or are currently working on this effort, but I have little faith in our current political system. It is possible that despite our best efforts, politics will still rule the day, cow agency staff, and the courts will have to intercede. And who knows what the next presidential election will bring. At least you can leave it all on the field knowing you gave it your best effort and did what was right. Dr. Jim Peek, Professor Emeritus, Dept. of Wildlife Science, University of Idaho, wrote in reviewing my book: "*But the issue of what a wildlife biologist stands for is raised in this book. I have the opinion that wildlife biologists have the moral obligation to stand up for the conservation, restoration, and proper management of the wildlife resource: all of it*". I wish the best for you and this effort to move grizzly bear restoration in the Bitterroot forward. Good luck!

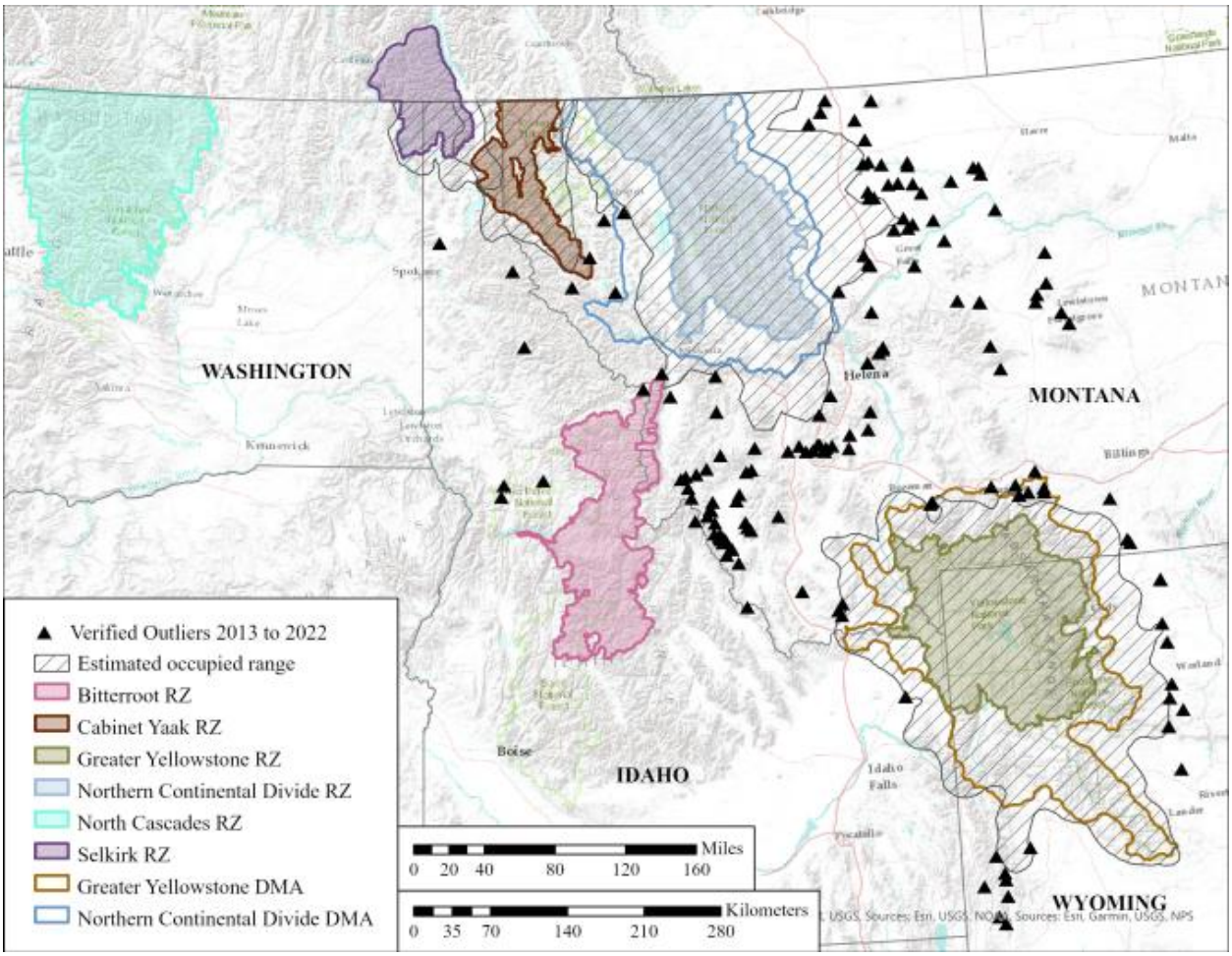
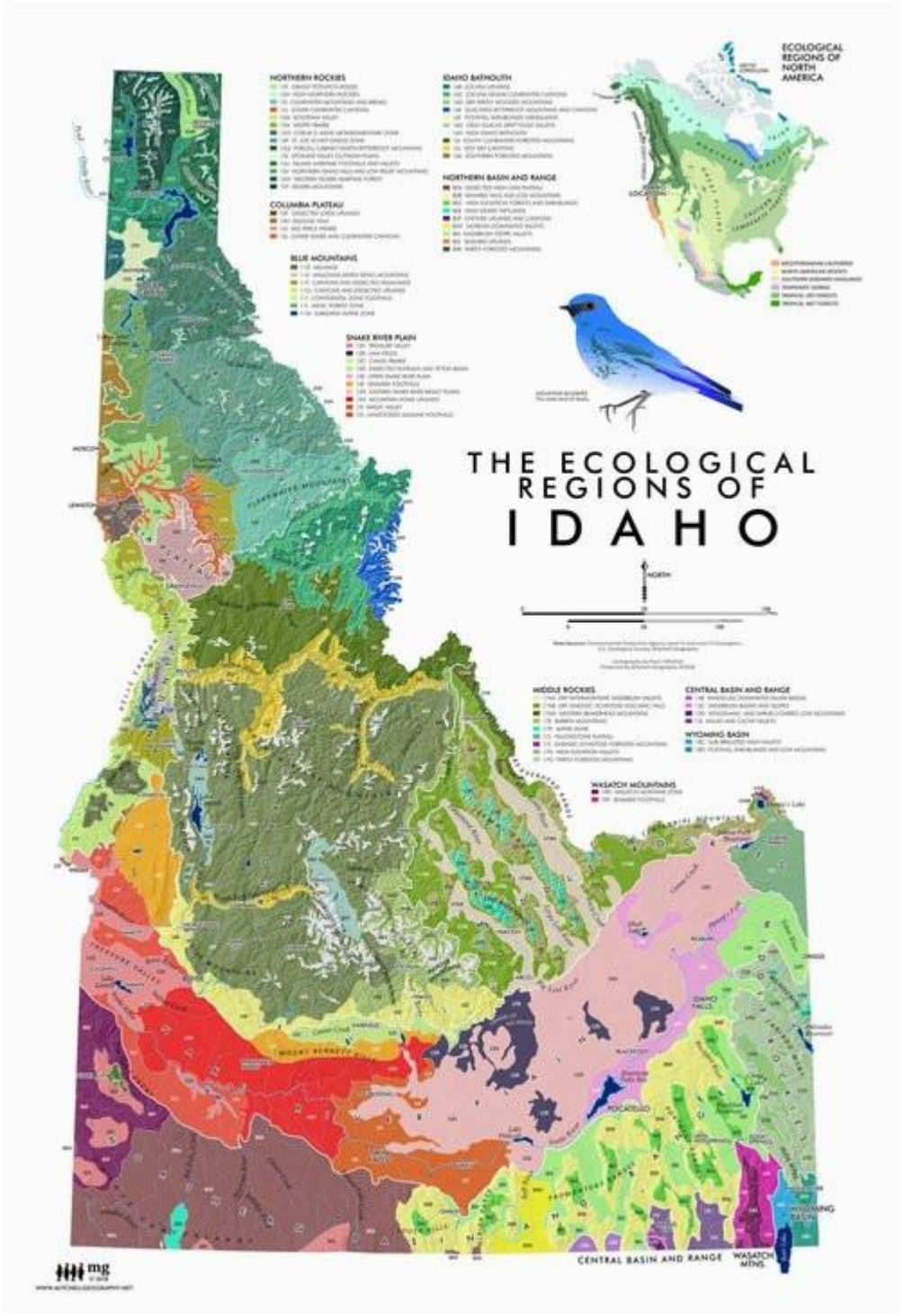


Figure 1. Verified grizzly bear observations outside of known occupied habitat. Note the observations seem to mostly stop at the Idaho border even though they are immediately adjacent to it on the Montana side. This is a testament to the lack of effort and desire by the state to avoid a narrative and proof of grizzly bear activity in the Bitterroot Ecosystem.


THE ECOLOGICAL REGIONS OF IDAHO
ECOLOGICAL REGIONS OF NORTH AMERICA
NORTHERN ROCKIES
IDAHO BATHOLITH
NORTHERN BASIN AND RANGE
COLUMBIA PLATEAU
BLUE MOUNTAINS
SNAKE RIVER PLAIN
MIDDLE ROCKIES
CENTRAL BASIN AND RANGE
WYOMING BASIN
WASATCH MOUNTAINS
NORTH
POCATELLO
IDAHO FALLS
CENTRAL BASIN AND RANGE
WASATCH MTNS.

DRAFT 2

Ecoregions of Montana

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