Dear Supervisor Probert:

We are writing you about an article entitled “Bitterroot Grizzlies Catch Forest Service at a Tough Time,” which appeared in The Missoulian on Wednesday, November 6, in which you are quoted regarding grizzly recovery in what is termed the Bitterroot Ecosystem. While the article contained some errors, which are detailed below, what is disappointing is the stated reluctance by the Forest Service to protect grizzlies and their habitat, as required by law, in the Nez Perce and Clearwater National Forests.

According to a study by the World Wildlife Fund,¹ the best concentration of high-quality grizzly habitat is in the Clearwater Basin. The map below, taken from that study, illustrates this point. The Clearwater Basin is wetter than the drier Salmon River system to the south, and it contains excellent grizzly habitat.² Indeed, the Idaho Department of Fish and Game documented reports of grizzlies in the Clearwater Basin in the 1980s. There was a confirmed grizzly in the Clearwater, and he was illegally killed by a hunter in 2007.

---


We need to protect grizzlies and their habitat because grizzlies have dispersed into the Clearwater. Indeed, the Endangered Species Act requires such action. The Bitterroot Ecosystem, of which the Clearwater Basin is a major part, has been a recovery area since grizzlies were listed in the lower 48 states. The article in *The Missoulian* quoted you as stating, “I’m trying to not add additional controversy where it’s not warranted at this time.” We sincerely hope you aren’t—but fear you very much are—attempting to turn a blind eye to this issue. The truth is protection has been warranted for many years. Grizzly bears have moved into the area. The article failed to mention the grizzly noted above, illegally killed by a black-bear hunter in 2007. That bear was five or six years old. The age of the bear suggests that he may have been a resident of the Clearwater and not merely a transient visitor. The Forest Service and other agencies should have had measures to protect grizzlies in place and should have implemented before that tragedy occurred.

Based on initial information that the Nez Perce-Clearwater National Forest has released about this forest-plan revision, you seem likely to even further reduce Forest Service protection of grizzly bears in the Clearwater. You were also quoted in *The Missoulian* as saying:

“We’re going to have a really difficult time moving forward with our forest plan revision that has some additional highly protected areas. We have an advisory vote on the ballot today asking whether the Forest Service should recommend any more wilderness or wild and scenic rivers in Idaho County. We could be adding too many things on.”

Draft alternatives you have circulated for a revised forest plan do not include one alternative that protects all of the roadless areas as recommended wilderness. Yet, there is an alternative that protects no roadless area as recommended wilderness. One alternative even allows motorized and mechanized uses in areas the agency recommends as wilderness. Even the most protective forest-plan alternative is roughly equivalent to the existing plans in terms of backcountry protection, yet it would quadruple logging levels over what has occurred during the past two decades.

Your statements and actions to date suggest that you do not prioritize grizzly recovery and habitat protection in spite of legal mandates to do so. The extant Clearwater and Nez Perce National Forests’ plans, which are over thirty years old, require the Forest Service to cooperate fully in grizzly recovery. Grizzlies are also listed as a management-indicator species for both forests in the 1987 forest plans. For example,

- “Manage habitat to contribute to recovery of each threatened and endangered

---

3 Grizzlies who are naturally expanding their range into the Clearwater Basin don’t lose their Endangered Species Act protections.
4 That bear’s carcass is now on display at your office.
5 The existing condition includes the Clearwater National Forest lawsuit-settlement agreement, protections in the Nez Perce Forest Plan, and the limited protection offered by the Idaho Roadless Rule.
species occurring on the Forest, including the grizzly bear, gray wolf, and bald eagle.” Clearwater Forest Plan at II-2.

- “Cooperate with future recovery efforts on behalf of the gray wolf, bald eagle, and grizzly bear.” Clearwater Forest Plan at II-24. This is a mandatory standard.
- “The Forest will cooperate in the recovery of species listed in accordance with the Endangered Species Act.” Nez Perce National Forest Plan at II-6 as amended by amendment 3.

Indeed, your comments suggest reluctance to cooperate with future recovery efforts for the grizzly bear and are at odds with the forest-plan excerpts above.

The statement about the Idaho County advisory vote reflects a view that .0049 percent of the US population should determine management of the Nez Perce and Clearwater National Forests. These are National Forests, not Idaho County forests. Do you work for Idaho County or for the citizens of all of the United States?

The Nez Perce Forest Plan EIS explains the importance of the unroaded habitat:

> Because of their currently unroaded condition and proximity to existing wilderness, approximately 334,730 acres of roadless lands offer the greatest potential of any of the nonclassified lands for contributing to the recovery and conservation of both the grizzly bear and the wolf. These roadless areas are Mallard, East and West Meadow Creek, Rackliff-Gedney, and Gospel-Hump. To the extent that these lands are roaded, it will become increasingly more difficult to manage for recovery of these species.

Nez Perce Forest Plan FEIS at II-36. Scientific information and studies document negative impacts of motorized access on grizzly survival. This led the Forest Service, albeit under citizen pressure, to adopt practices to limit road and motorized access to grizzly habitat, known as Amendment 19, in the Flathead National Forest.\(^6\) This is somewhat analogous to the management standards to protect elk habitat in the Clearwater and Nez Perce National Forests’ Forest Plans.

Although not attributed as a direct quote to you, the article states, “About three-quarters of the Nez Perce-Clearwater National Forest’s 4 million acres is roadless or wilderness, leaving little space for industrial or motorized users. That makes the possibility of more wildlife-related restrictions a politically sensitive matter, she said.” That statement is

\(^6\) Amendment 19 established road density and motorized access density standards in various bear management units on the Flathead National Forest. Amendment 19 also protected bull trout and other fish by requiring that all stream-aligned culverts be removed from roads and reclaimed or decommissioned to lower total road densities. It also limited the allowable sale quantity (ASQ) to an average of fifty-four million board feet annually.
inaccurate, as most roadless areas are not closed to motorized use\textsuperscript{7} or to logging. In other words, the Forest Service has failed to protect grizzly and other wildlife habitat in roadless areas from the ravages of vehicle use or industrialization.

In conclusion, your statements reflect hostility towards protecting grizzly habitat and recovering the species in the best grizzly habitat in the Rockies from Yellowstone National Park to Jasper National Park. While natural recovery was thought unlikely in the Final Environmental Impact Statement on Grizzly Recovery in the Bitterroot Ecosystem, it now appears that natural recovery could very well occur if allowed to happen.\textsuperscript{8} The ESA requires that recovery occur in the Bitterroot Ecosystem, and the Nez Perce and Clearwater National Forests are the best habitat within that ecosystem.

We look forward to a change in direction that will protect grizzly habitat as required by law. This change in direction would include close coordination with other agencies to provide protected connective habitat so grizzlies can return to the Bitterroot Ecosystem. We also look forward to a complete change in direction in the proposed forest plan towards a path that protects important roadless habitat from development, and from motorized and mechanized use.

Sincerely,

Gary Macfarlane
Friends of the Clearwater
PO Box 9241
Moscow, ID 83843
gary@freindsoftheclearwater.org
(send any reply to the above address)

Ron Mitchell,
Idaho Sporting Congress, Inc.

Brain Peck
Independent Wildlife Consultant

Deirdre Bainbridge
SEWAC/Shoot’em With A Camera, LLC.

\textsuperscript{7} These areas in the Clearwater National Forest were opened to motorized use under a travel plan that a federal court has since set aside as unlawful and has yet to be replaced. You also have not completed the Nez Perce National Forest Travel Plan.

\textsuperscript{8} Even Chris Servheen, the former Fish and Wildlife Service Grizzly Bear Recovery Coordinator admitted in 2012, “Sooner or later I think we will document another grizzly in the Bitterroot.”
Sarah McMillan,  
WildEarth Guardians  

Arlene Montgomery,  
Friends of the Wild Swan  

Chuck Irestone  
Save the Yellowstone Grizzly  

Louisa Willcox  
Grizzly Times  

Josh Osher  
Western Watersheds Project  

Mike Garrity  
Alliance for the Wild Rockies  

Rick Bass  
Yaak Valley Forest Council  

Larry Campbell  
Friends of the Bitterroot  

Keith Hammer  
Swanview Coalition  

George Nickas  
Wilderness Watch  

Mike Bader  
Flathead-Lolo-Bitterroot Citizen Task Force  

George Wuerthner  
Mountain Bikers for Wilderness  

Denise Boggs  
Conservation Congress  

Ara Marderosian  
Sierra ForestKeeper  

Matthew Koehler  
WildWest Institute
Lori Andresen
Save Our Sky Blue Waters

Matt Peters
Heartwood

Dennis Brueggermann
Kootenai Environmental Alliance

cc: Hillary Cooley, US Fish and Wildlife Service grizzly recovery coordinator