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Nez Perce-Clearwater National Forests
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Please accept these comments submitted on behalf of the Flathead-Lolo-Bitterroot Citizen Task Force, a 501(c)(3) public interest organization based in Missoula, Montana. We incorporate by reference the comments submitted by the Friends of the Clearwater.

We have a direct interest in National Forest planning and the future of the Nez Perce-Clearwater National Forests. Our organizational mission includes protection of the National Forests and fish and wildlife habitat including roadless areas and connectivity habitat between the major wildland ecosystems in the Northern Rockies. Missoula is the closest urban area to the wildlands on the Nez Perce-Clearwater National Forests and Montana residents use these forests at high levels. Moreover, the Nez Perce-Clearwater National Forests contain several roadless areas shared with Montana and the Lolo and Bitterroot National Forests that have been proposed for Wilderness and are part of an essential linkage for grizzly bears.

The EIS ignores the comments we sent on February 27, 2018 asking for it to include an alternative based on several key points. For example, the EIS failed to include an alternative that calls for all 1.5 million acres of roadless area to be recommended for Wilderness. It fails to include the numeric, measureable and mandatory aquatic and riparian protection strategies encompassed within INFISH/PACFISH and fails to analyze active road decommissioning and reclamation aimed at reducing total forest roads by at least 20%. It drops previous standards for fisheries and old growth protection.

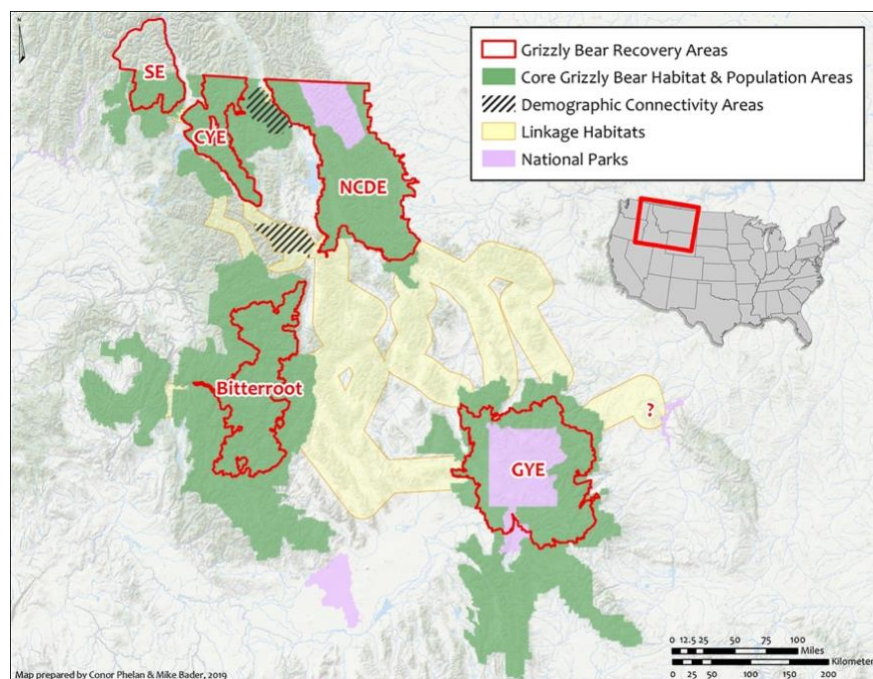
The Nez Perce-Clearwater National Forests have affirmative legal obligations under the Endangered Species Act to provide for grizzly bear recovery. Grizzly recovery in the greater Salmon-Selway-Bitterroot is necessary to long-term grizzly bear viability throughout the Northern Rockies, including the NCDE and greater Yellowstone regions.

The U.S. Fish & Wildlife Service has adopted a natural recovery strategy for the Salmon-Selway-Bitterroot, relying on natural in-migration from other areas in the Northern Rockies. Therefore, the Nez Perce-Clearwater National Forests have an obligation to identify and protect habitat linkages between the Forests and the rest of the Northern Rockies. The EIS fails in this regard, despite linkages being the official policy of the Interagency Grizzly Bear Committee of which the Forest Service is a member, and the U.S. Fish & Wildlife Service Grizzly Bear Recovery Plan.

Moreover, a panel of five scientists with expertise on grizzly bears totaling more than 150 years authored a compendium of professional statements (Drs. Allendorf, Metzgar, Mattson, Horejsi and Craighead 2019) which conclude that the current recovery areas will not support enough grizzly bears to constitute a population with viability over several hundred years. This compendium is submitted along with these comments. A video with highlights of their live presentations can be viewed through the link below and we submit this film as part of our comment.

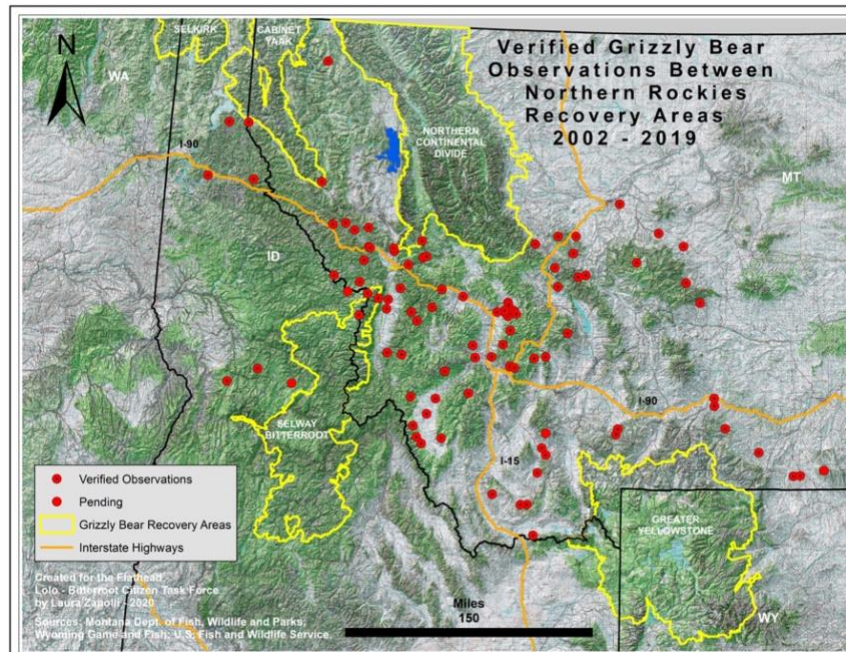
https://www.youtube.com/watch?v=vmt5JdcILZk&feature=emb_share&fbclid=IwAR3HVICNAFgD-T7rftmjOWsYa7AGoCbkoDUH34UqrytDMB2Ppdu-EZRMXMU

These scientists all agree the only way to recover grizzly bears in the Northern Rockies is to link the five isolated recovery areas with linkages of protected habitat with sufficient security to allow occupation by both male and female grizzly bears as shown below. Recovery of grizzly bears requires reestablishment of a third major breeding population in the Selway-Bitterroot region in Idaho to provide core habitat and regional linkage between the other Recovery Areas.



Recent verified observations of grizzly bears in and adjacent to the Nez Perce-Clearwater National Forests is significant new information requiring the preparation of a Supplemental Environmental Impact Statement (SEIS). An SEIS is required because as noted above, the EIS as currently written does not contain sufficient analysis of potential effects of the alternatives on grizzly bear habitat, grizzly bear survival and eventual recovery. Many aspects of the status of the grizzly bear remain unknown as the Forest Service cannot manage what it has not measured. There was no comprehensive analysis of vegetation and other food sources important to grizzly bears in the Bitterroot Recovery Area and within key habitat linkages; no assessment of the importance of roadless areas to grizzly bear recovery and the impact on recovery that would result from the proposed reduction of roadless areas under the various alternatives; no measurement of potential climate change effects on these resources; incomplete measurement of road and motorized trail densities and their impacts on grizzly bear habitat and mortality risk; no assessment of the increase in visitors and backcountry recreational use.

The letter from the U.S. Fish & Wildlife Service (January 21, 2020) acknowledging grizzly bear occupancy of lands within and near the Bitterroot Recovery Area including the Nez Perce-Clearwater National Forests, informed the Forests they have Sec. 7 consultation obligations under the Endangered Species Act. However, the area where these formal consultations are required cannot be arbitrarily limited to small areas around verified observations. The consultations must be applied forest-wide.



The observations shown on the map are only the ones verified using stringent requirements of a photo or video with date and time stamp, hair sample or other physical evidence. Many “likely” observations are not included and staff are not available to follow up on tracks, diggings, buried carcasses and so forth. Thus, the verified sample is certain to be a sub-set of

total observations and the grizzly bears who were or remain undetected. There has been no comprehensive survey effort that would warrant exclusion of lands from likely occupancy and the formal consultation requirements as well as detailed analysis, standards and discussion within the EIS. Thus, an SEIS is required.

It is also well-known that grizzly bear expansion has outpaced management response. The Nez Perce-Clearwater National Forests are way behind in providing storage for food attractants at campgrounds, picnic areas, boat launches and other facilities. A comprehensive inventory and assessment is required and an action plan developed to remediate deficiencies. These must be included in the SEIS.

Sincerely,

Patty Ames, President
Flathead-Lolo-Bitterroot Citizen Task Force

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