

Tom Vilsack
US Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250
agsec@usda.gov

May 20, 2021

Dear Secretary Vilsack:

We are undersigned experts and organizations concerned about the future of the grizzly bear, currently listed as threatened under the Endangered Species Act. We are writing to urge that you direct the Forest Service to amend select Land Management Plans that we detail below in order to better protect grizzly bears and facilitate their recovery since the majority of grizzly habitat in the lower 48 states is found on national forests.

Grizzly bear biologist Dr. David Mattson's recent report, The [Grizzly Bear Promised Land](#),¹ outlines the minimum number of individuals required to maintain a viable population of grizzly bears. Science suggests that grizzly bears, with their low reproductive rates typical of many large mammals, need 2,500-9,000 individuals in a connected population in the contiguous United States for the species to achieve long-term viability.

A key factor for grizzly recovery lies within Idaho as it connects the populations in the Greater Yellowstone to those in the Selkirk Mountains, the Cabinet-Yaak, and the Northern Continental Divide.² Indeed, the Bitterroot Recovery Zone³ on national forest land in Idaho and northwest Montana is crucial because its large size and relatively intact habitat have potential to support a thriving grizzly bear population. In fact, grizzlies are already beginning to reinhabit this area. Dr. Mattson's report affirms incorporating Idaho wildlands into grizzly recovery landscapes would add habitat and would better connect population strongholds for genetic interchange and variation which is crucial to long-term viability.

The recent grizzly sightings in the Bitterroot Recovery Ecosystem and the vulnerability of grizzlies as they range more widely in search of food in a changing climate raise important issues for national forest management. There are important steps the USDA could do to further grizzly recovery in the Northern Rockies.

One crucial action is to initiate a process to amend all land management plans with suitable grizzly bear habitat⁴ with several key components. Critical to such a multi-plan amendment is

¹ Found also at <https://www.mostlynaturalgrizzlies.org/selway-bitterroot>.

² The only recovery area out of the northern Rockies Region is the North Cascades, though connectivity to the grizzlies in the northern Rockies would be important for that population as well.

³ Only a portion of the grizzly habitat in the ecosystem.

⁴ Idaho Panhandle, Kootenai, Colville, Flathead, Lolo, Nez Perce-Clearwater, Bitterroot, Helena-Lewis and Clark, Beaverhead-Deerlodge, Salmon-Challis, Payette, Boise (a small portion within the Bitterroot Recovery Zone in the

identifying key large habitat linkage areas for protection as grizzly bear habitat. Three essential components in the multi-plan amendment that should be applied to suitable grizzly bear habitat as well as linkage areas are:

- Standards that establish limits on motorized and mechanized route density and set secure habitat thresholds within linkage areas.⁵
- Standards that include food security co-existence measures, specifically ones that address both front country and backcountry camping and restrict black bear baiting, which can be lethal to grizzlies.
- Standards that include livestock-grizzly co-existence measures, specifically one that allows for voluntary permit retirement that would apply Animal Unit Months (AUMs) associated with permits lost, relinquished, or canceled to watershed protection and wildlife (grizzly bear) habitat.

While the multiplan amendment is being completed, USDA should consider implementing interim measures to reduce road density and improve grizzly bear co-existence until finalization of the multiplan amendment.

Thank you for taking the time to consider implementing a multi-plan amendment to further grizzly bear protection and recovery and we look forward to your reply.

Sincerely,

Mike Garrity
Alliance for the Wild Rockies

Arlene Montgomery
Friends of the Wild Swan

Thomas Wheeler
EPIC (Environmental Protection
Information Center)

Joseph Scalia III, Ph.D.
Gallatin Yellowstone Wilderness Alliance

Patty Ames
Flathead-Lolo-Bitterroot Citizen Task Force

Louisa Willcox
Grizzly Times

Gary Macfarlane
Friends of the Clearwater

Brian Peck
Independent Wildlife Consultant

Michele Dieterich
Friends of the Bitterroot

John G Carter
Kiesha's Preserve

Frank Church-River of No Return Wilderness), Caribou-Targhee, Custer-Gallatin, Bridger-Teton, and the Shoshone National Forests.

⁵ Currently, only the Custer-Gallatin National Forest Plan attempts to identify “key linkages,” but the final draft plan still lacks the necessary protective standards within these areas.

Paul Sieracki
MS Geospatial Analyst / Wildlife Biologist

Rene Voss
Natural Resources Attorney

Julian Matthews
Nimiipuu Protecting the Environment

Steven Krichbaum
Ph.D. Zoology - Conservation Biology

Christine Canaly
San Luis Valley Ecosystem Council

Lori Andresen
Save Our Sky Blue Waters

Doug Peacock
Save the Yellowstone Grizzly

Amy Anderson
Selkirk Conservation Alliance

Ara Marderosian
Sequoia ForestKeeper®

Andy Mahler
Shagbark
Keith Hammer

Swan View Coalition, Inc.

Susan Jane Brown
Western Environmental Law Center

Erik Molvar
Western Watersheds Project

Linda Dworak DVM, PhD
Wild Covenants, former Environmental
Scientist MT DOT

Adam Rissien
WildEarth Guardians

Kevin Proescholdt
Wilderness Watch

Katie Fite
Wildlands Defense

Kristin Combs
Wyoming Wildlife Advocates, Executive
Director

Rick Bass
Yaak Valley Forest Council

Jason L. Christensen
Yellowstone to Uintas Connection

Cc: Chris French, Acting Under Secretary for Natural Resources and Environment, chris.french@usda.gov
Vicki Christiansen, Chief Forester, U.S. Forest Service victoria.christiansen@usda.gov
Leanne Martin, Regional Forester, Northern Region, U.S. Forest Service, leanne.marten@usda.gov
Noreen Walsh, Regional Director, Mountain-Prairie Region, U.S. Fish & Wildlife Service,
Noreen_Walsh@fws.gov
Matt Hogan, Deputy Regional Director, Mountain-Prairie Region, U.S. Fish & Wildlife Service,
Matt_Hogan@fws.gov
Hilary Cooley, Grizzly Bear Recovery Coordinator, U.S. Fish & Wildlife Service, hilary_cooley@fws.gov