

Tom Vilsack
US Secretary of Agriculture
U.S. Department of Agriculture
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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,

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Friends of the Bitterroot

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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.

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