

October 20, 2021

Matthew Anderson. Forest Supervisor Bitterroot National Forest
1801 North 1st Street
Hamilton, MT 59840
CC: Jodi Bush USFWS

Supervisor Anderson,

This letter is in response to persistent grizzly bear sightings on the Bitterroot National Forest (BNF) and adjacent lands going back to 2004, including four in 2021 (one at St Mary's Lookout and three in the East Fork). We urge you to initiate and complete a forest-wide amendment for grizzly bears that adopts numerical motorized access standards at least as protective as did Amendment 19 from the original Flathead Forest Plan, and establishes Bear Management Units (BMUs) on the Forest. The Endangered Species Act applies not just to the entire population of the grizzly bear, but to individuals as well, wherever they go. The current Forest Plan fails to protect these individuals.

In the recent ruling on the Flathead Forest Plan (Attachment 1), forests must consider the direct, indirect, and cumulative effects of proposed actions on the entire population of grizzly bears in the lower 48. The recent five-year review (Attachment 2) published by United States Fish and Wildlife Service (FWS) emphasizes the importance of connectivity to grizzly bear recovery. "The uncertainty associated with the stressors of human-bear conflicts, human population growth, and potential **reductions in connectivity** further represent a possible reduction in overall viability of the grizzly bear in the lower-48 States in the foreseeable future." (Attachment 2 at 21, emphasis added).

The current BNF Forest Plan does not recognize the presence of grizzly bears on the Forest or its role in connectivity to the Bitterroot Recovery Area and its eventual recovery. It does not include BMUs or secure core habitat and road density standards.

In regards to the Bitterroot Ecosystem (BE), the review states, "Approximately 98 percent of the BE recovery zone is designated Wilderness, but the condition of large intact blocks of land is moderate because **motorized access standards have not been developed for the recovery zone or for adjacent areas to the north and east**, where female occupancy is necessary for natural recolonization of the BE." And, "Despite its relative isolation from other ecosystems, recent sightings suggest that **inter-ecosystem connectivity is possible**, although currently very low for the BE" (Attachment 2 at 9, emphasis added).

In contrast to the Bitterroot Ecosystem, habitat for bears in the other Recovery Areas is delineated by forest plans into BMUs where total and open road densities are limited in order to reduce human caused bear mortality and increase habitat security. Recent sightings, recent court decisions, and an emphasis on connectivity in the five-year status review call for BNF to now consider its role as a linkage zone and recognize its importance in the reentry of the grizzly bear into the Bitterroot Recovery Area.

If BNF does not wish to go the route of Amendment, it is still obligated to initiate re-consultation with FWS on the impacts of the Forest Plan on grizzly bears in light of the new information. The Lolo National Forest is currently updating their grizzly bear consultation of 2017 due to grizzly bear presence on the Forest and a recent court decision (Attachment 3). BNF should do the same."

We look forward to hearing your response on this matter.

Thanks for your time and consideration.

Jim Miller,
President
Friends of the Bitterroot

Jeff Juel

Montana Policy Advisor
Friends of the Clearwater

Patty Ames
Flathead Lolo Bitterroot

Task Force