

STATE OF MONTANA



DEPARTMENT OF FISH AND GAME

529
Helena, Montana 59601
July 2, 1975

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Gentlemen:

Enclosed for your information and review is an addendum to the statewide big game hunting season impact statement. This addendum addresses itself specifically to the hunting of grizzly bear.

If your name is a recent addition to our mailing list you will also find enclosed the 1972 impact statement for your use in evaluating the proposed action.

If you have comments or corrections to make, please have those comments to us not later than August 4, 1975.

We would like to thank you for taking the time to review this statement and comment.

Sincerely,

James A. Posewitz
James A. Posewitz, Administrator
Environment and Information Division

JAP/sd

Enc

Adison Cowie
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Gary ...
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MONTANA DEPARTMENT OF FISH AND GAME

DRAFT ENVIRONMENTAL STATEMENT

ADDENDUM NUMBER ONE TO

PROJECT NO. FG-22

ANNUAL STATEWIDE HARVEST OF BIG GAME ANIMALS

Prepared in Accordance with
Environmental Impact Statement Requirements,
State and Federal

July 2, 1975

ENVIRONMENTAL IMPACT STATEMENT
ON THE SPORT HUNTING OF THE GRIZZLY BEAR
Addendum to 1972 EIS on Statewide Big Game Hunting Seasons

by

The Montana Department of Fish and Game

I. Purpose

Several wild and free-ranging grizzly bear (Ursus arctos horribilis) populations exist in Montana. They present an unusual challenge to resource managers because they are at the same time a "threatened" species under the proposed rules of the federal Endangered Species Act (1973), a Montana big game animal, a predator of livestock, and a possible threat to human beings.

Their habitat in Montana is managed by the U. S. Forest Service, the National Park Service, the Blackfeet and Flathead Indian tribes, the Montana Department of Natural Resources and Conservation, and various large private land holders.

The animals, however, are managed by the Montana Department of Fish and Game, the two Indian tribes, and the National Park Service. For those animals under state jurisdiction, the intent of the Montana Department of Fish and Game is to ensure the survival of viable grizzly bear populations, to manage them for their greatest value to the people and visitors in Montana, to reduce conflict between bears and livestock interests, and to minimize their danger to man.

II. Description of Proposed Action

The grizzly bear is among the big game species authorized by the State Legislature for the Montana Fish and Game Commission to manage for the welfare of the species. Management of viable populations includes an annual harvest of big game animals (Mont. EIS, 1972).

The Montana Fish and Game Commission's grizzly bear policy is, in part, "...to perpetuate and manage this unique wildlife species in suitable habitat of the state for the people of Montana" (and the nation). With good evidence that viable populations are present in Montana, and that grizzlies are a species requiring special consideration, "hunting seasons and regulations shall be based upon management experience and research findings concerning this bear."

Grizzly seasons are concurrent with other big game species, principally elk, in certain hunting districts of the state, but with specific grizzly regulations. A double license is required (for both hunting and possessing of a grizzly), and the hunting license may not be purchased after July 1. Additional regulations require reporting of the kill, presenting the hide and head for tagging, and temporarily relinquishing the head to the state for studies. Information obtained in this manner, along with other field data, provide management guidelines for the following year.

In 1975 the season on grizzly bears will be open in ten hunting districts. This season will close on 48-hour notice when the total number of grizzly bears killed (for any reason) or otherwise removed from the wild population in Montana by humans, has reached 25. In compliance with the recommendations of the NAS report, no grizzly bear seasons will be in effect in the five hunting districts adjacent to Yellowstone National Park during 1975 and 1976.

III. Description of the Existing Environment

Grizzlies are present in Montana in two general areas: the northwestern portion of the state west of Great Falls and north of Missoula, and in southwestern Montana adjacent to Yellowstone National Park. Their range includes state and federal government lands, including Glacier and Yellowstone National Parks, wilderness areas, other wild lands, Indian reservations, and private lands.

A. Human Resources

In the primary grizzly bear habitats of Montana, concurrent use of the land by people varies from incidental and intermittent, to that of year-round habitation (ranches, communities, and towns). These activities by man do occasionally conflict with the bears.

Depending upon the circumstances and the individuals involved, grizzly and human conflicts have occurred in the past and will likely continue in the future, but at a statistically low rate. Encounters with grizzlies do not always constitute a conflict, but are considered by some persons as a memorable experience. And gradually owners or custodians of grazing livestock in known grizzly habitats are moderating their view that the presence of any bear is incompatible with their livestock. This new, and more realistic view, is that grazing permits on federal lands are a privilege, and the loss of livestock on federal grazing lands is an acknowledged risk included in the privilege.

In areas of marginal or disturbed grizzly habitat, however, people and the activities of man are far more common. Examples are the heavily logged areas of the Whitefish Range and the Swan Valley, the farming land along the foothills of the Mission Mountains and the Continental Divide west of Great Falls, and the human occupancy along the North Fork of the Flathead River.

The various forms of conflict or interaction between bears and man in these marginal and disturbed areas include hunting, inadvertent disturbance of bears, habitat destruction, attacks on livestock, and destruction of property.

In both of the situations described above, however, the grizzly bear has various meanings to the people involved. Several views, values, and standards may be individually or collectively attached to a single circumstance. To different persons, a grizzly may mean adventure; a species to be maintained at maximum densities; part of the western mountain wilderness concept; a coveted big game trophy; a species that cannot be tolerated; a potential threat to life, livestock, or property; and many other personal images.

It is vitally necessary to the destiny of grizzly bears in Montana, therefore, that the public be convinced to reevaluate their opinions and the values they attach to the grizzly bear. Man's role in grizzly domain will determine whether the species shall survive, but experience has shown that simple solutions and blanket rules will not be the means to this goal.

B. Physiography and Geology

The western third of Montana is comprised of the Rocky Mountains, with interspaced mountain valleys. Geologic features have been described earlier (Mont. EIS, 1972).

C. Land Use and Ownership

Grizzly habitat is used for farming, ranching, grazing, timber, watershed management, wildlife habitat or recreation. Much of the habitat is under Forest Service control. Outside of wilderness, it is used for grazing as well as timber and watershed management (Mont. EIS, 1972).

D. Wildlife

The overall mountain habitat for grizzlies includes heavy timber, stream bottoms, burns, alpine meadows, rock slides and tundra. Food requirements are principally grasses and sedges, bulbous roots, carrion, berries, nuts, forbs, small mammals and a variety of additional edibles.

E. Vegetative Resources

Forests and alpine grassland (Mont. EIS, 1972).

F. Climate

Grizzlies are seasonally active from April through November, but usually remain concealed in dens during the winter.

G. Transportation Systems

Certain grizzly bear hunting districts are more accessible by road, but some areas can be traveled only on foot or by horse. The best hunting areas, the divides and the areas above the tree lines, have few roads or trails.

IV. Evaluation of Environmental Impact

A. Environmental Impact of Proposed Action

1. The principles of game management have proven valid over many decades of game research and management in North America. There is no reason, at present, to suspect that these principles should not be applied to remove surplus animals from the Montana grizzly population on a sustained basis, at no detriment to the species.

2. Northwestern Montana grizzly populations will have seasons in selected hunting districts. The legal kill by hunting will be added to other man-caused losses to not exceed a total quota of 25. The quota of 25 is well below the known mortalities of the previous eight years (Greer, 1972, 1975), and so far as is known, this level of kill is well within the replacement rate for the bears of this area.

3. Hunting of animals which aggressively compete with man for resources and space may have the beneficial effect of making them wary. In the case of the grizzly, this embodies considerable spin-off by making the bears wary of hikers, loggers, campers, fishermen, etc., as well as of the hunters, a net benefit in the welfare of the species.

4. Even with annual hunting seasons, there have been nuisance and marauding bear incidents that require control actions (i. e., killing or removal) each year. Such complaint actions require minimal time and manpower, but also involve risk to the public and to departmental personnel. In some cases, a helicopter is required in addition to vehicles, traps, special equipment, etc. Direct and indirect costs therefore range from \$50 to \$900 per grizzly capture. Carefully managed hunting can be assumed to keep this cost and risk at a level tolerable to the state and to the local people involved.

5. Hunting of grizzlies also provides a high level recreational hunt to those wishing to participate, and is fully within their rights under present regulations. Hunting is a heritage that may be passively or actively pursued and enjoyed. The reasons for hunting are as varied as the people who participate, or who assist those who participate. The values and benefits derived by this pastime are great to a large segment of the Montana population. The primary benefits, however, accrue to the wildlife themselves since their only representation or real hope for the future is financed by sportsmen and usually sportsmen alone.

B. Adverse Environmental Effects Which Cannot Be Avoided.

1. Hunting may make grizzlies less easy to observe than if they were not hunted, and this would be detrimental to the casual photographer or tourist.

2. Vehicles use basic energy resources that are irrecoverable; exhaust gases contribute to air odors and impurities, and the vehicles have noise levels above those present in the wild. Vehicles, horses, and foot travel may increase soil erosion in some instances. Careless campfire or smoking habits of grizzly bear hunters may result in fire damage, and some vegetation disruption may be associated with hunting (Mont. EIS, 1972).

3. A few accidental grizzly deaths, or deaths of other animals, may occur with the live trapping program required to document population levels, productivity, etc.

C. Alternatives

1. Destruction by state or federal employees of bears which cause damage or injuries. Regulated hunting apparently has not overexploited or depleted grizzly populations. Under these conditions, several incidents of marauding or nuisance grizzlies have occurred annually during the spring, summer and autumn.

2. Have a limited permit season. In effect, limiting the number of grizzly bear hunters, rather than the number of bears killed. This would defeat the goal of having sufficient hunters in the field to make bears wary, and probably would not achieve an adequate kill of surplus bears (because the hunting success is so low). A quota on the number of bears killed is much more direct and manageable. It would also limit the number of sportsmen able to participate in the hunt, depriving them of benefits that accrue even to unsuccessful hunters.

3. Close all grizzly bear seasons. With the elimination of hunting, it is predictable that the surplus grizzlies could be involved in incidents and conflicts with man at a greater rate, and that as many or more grizzlies could become casualties, especially in areas where sheep and livestock grazing permits are authorized. Illegal killing can be increased easily and without detection in rugged back country, ultimately defeating this approach in any case. Furthermore, this action would possibly encourage the illegal traffic of grizzly pelts, claws, teeth, or heads. The current "hearsay" values range from \$200 for claws to \$2,500 for hides. Most important, it would lead many individuals genuinely concerned in the bear's welfare to the erroneous conclusion that the bear is secure. This misconception can only reduce opposition to destruction or encroachment on bear habitat.

4. Capture all troublesome grizzlies and:

a. Give them to zoos. This action has been explored to the fullest. Zoos generally do not want nuisance grizzlies unless they have a trading value with other zoos. Cubs and yearlings are generally sought more, but in fact most zoos already have sufficient grizzlies from previous donations and from successful reproduction among their confirmed animals.

b. Translocate to former ranges. Preliminary investigations indicate that no former grizzly ranges are suitable for reestablishment. State policy requires adjacent and nearby landowner written approval for relocations. Because home ranges of introduced animals may vary from the expected, and result in depredation complaints or injury to people, the entire approach is fraught with uncertainties.

Any such attempts at reintroduction should therefore be based on a long-term, careful study program. In the past, all western states have been offered grizzlies for their mammal fauna, but none have accepted.

c. Relocation of bears to authorized areas. Nearby areas are often available within or adjacent to the home ranges of troublesome grizzlies. This has been a temporarily effective method in the past, and can be improved upon in the future, but is not a good, long-term solution. Economic cost per individual bear can become significant, and often naturally injured (less desirable) grizzlies are involved. The known survival rate of grizzly bear transplanted out of Yellowstone National Park has been extremely poor (Greer, 1974).

D. Short Term -- Long Term Use

In the past five years there have been more incidents of problem grizzlies than in prior years. Increasing human populations in grizzly habitats are the probable cause, and can be expected in the future to cause even more problems between man and bears. These short-term events, therefore, may develop into long-term problems and programs, perhaps to the detriment of the bears, unless the increase in human activities can be restricted to the marginal habitat.

The present annual quota of 25 grizzlies may or may not permit adequate cropping to reduce emigration of subadults into peripheral habitats. This figure must be modified as conditions (and data) dictate.

Roads which provide too easy access into prime grizzly habitat will probably have to be closed, and certain timber harvest programs modified. Long-term population, habitat, recreation, and land-use studies will be required to determine the proper levels of long-term use which will allow us to maintain the present habitats and existing viable grizzly populations. Other agencies, organizations and individuals will have to share this concern, and work in a coordinated effort, if long-term use is to be compatible with maintenance of the species.

E. Irreversible and Irretrievable Commitment of the Resource.

Several stable, free-ranging grizzly populations are present in Montana, and they depend primarily upon the quality and quantity of their present habitats.

Present levels of killing or removal of grizzly bears are apparently not resulting in any irreversible commitment of the resource. And because these levels of removal can be regulated on an annual or even shorter time basis, should new data become available, the management program poses no threat to the species. In fact, more precise management should be of benefit to the species.

On the other hand, the slow and steady destruction of grizzly habitat through "land development" programs, especially logging, clear-cutting in key areas, plus the associated roadbuilding, hauling and clean-up, can make bears more vulnerable to hunters or may disrupt the ranges and social hierarchies of bears (Kemp, 1974). Recreational developments in grizzly habitat can also be a negative value (i. e., habitat loss) to the bear (Jonkel, 1975). Such action may in fact set irreversible trends detrimental to the bears.

The same may be true for federal intervention as a result of pressure by anti-hunting conservation groups. Such action may dictate "over-conservative" hunting quotas. Such mismanagement could lead to an irretrievable loss in professional and public credibility, especially with local people who are acquainted first-hand with the situation, and to extraordinary methods in an attempt to stabilize various populations (such as happened in Yellowstone National Park). When management becomes a political and courtroom issue, or a matter of personal differences, the resource (in this case, grizzlies) will be the ultimate loser.

F. Discussion of Problems and Objections by Other Agencies or the Public.

The general public has various levels of knowledge and opinion about grizzly bears: their ecology, biology, behavior, population structure, and the annual mortality, including both regulated and unrestricted hunting. Questionnaires sent to each of the 2,600 grizzly bear hunters of the past three years indicate a high level of knowledge, respect, and consideration of the grizzly and its future. Some hunters' comments on the current grizzly seasons include: the possibility of overkill in some areas; earlier seasons in more hunting districts; a spring hunting season; the use of dogs or baits; a limit of one grizzly per lifetime; a season in additional districts; and the elimination of nonresidents from hunting.

As a land management agency, the U. S. Forest Service has also established a new approach to some of the paramount problems (roading, logging, grazing, etc.) that may be associated with the welfare of the grizzly. Meetings with the Forest Service and other agencies concerning grizzly habitat have been very productive, and they would improve their management practices even more if they were provided with adequate guidelines.

Stockmen's groups take strong public and political stands on predators which kill their livestock. They support the hunting of predators and have frequently requested the trapping or poisoning of marauding grizzlies, or taken unilateral action to quietly exterminate problem animals. Some individual stockmen, however, are developing a genuine concern for the bear and endure occasional losses philosophically.

V. A Summary Statement

The intent of this EIS is to examine the possible effects of grizzly bear seasons on the environment in Montana, to explore the reasonable alternatives, and to make the information available to the public.

References:

- Greer, K. R. 1972 Grizzly bear mortality and management programs in Montana during 1971. Mont. Dept. of Fish and Game Job Comp. Rept., Proj. W-120-R-3, No. L-1.1:44pp
- Greer, K. R. 1974 Grizzly bear mortality and management programs in Montana during 1973. Mont. Dept. of Fish and Game Job Comp. Rept., Proj. W-120-R-5, No. L-1.1:51pp
- Greer, K. R. 1975 Grizzly bear mortality and management programs in Montana during 1974. Mont. Dept. of Fish and Game Job Comp. Rept., Proj. W-120-R-6, No. L-1.1: in preparation
- Jonkel, C. J. 1975 Of bears and people. Western Wildlands. 2(1):30-37
- Kemp, G. A. 1974 The dynamics and regulation of a black bear population: 1968-73. Proc. 3rd Intern. Conf. on Bear Res. and Manage. Binghamton, N. Y.

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Prepared by: Kenneth R. Greer and Charles J. Jonkel

Mr. Kenneth R. Greer is a wildlife research biologist in charge of Montana Department of Fish and Game wildlife investigation laboratory on the campus of Montana State University in Bozeman, Montana. He received his BSc and MSc degrees in fish and wildlife management from Montana State College in 1952 and 1953. Mr. Greer worked as a biologist in the fur resources section of game management in Montana from 1953-56 at Kalispell and Bozeman, and then established the wildlife laboratory in Bozeman. Mr. Greer is a member of the Society of Mammalogists and The Wildlife Society.

Dr. Charles J. Jonkel is a visiting professor of wildlife biology and research associate at the University of Montana at Missoula. He is presently in charge of a border grizzly bear research program in northwestern Montana.

Dr. Jonkel has gained national acclaim for his research on both black and polar bears. In addition, he has worked with musk oxen, arctic wolves and marine mammals.

Dr. Jonkel holds a BSc from Montana State University, 1957; MSc from Montana State University, 1959; and a PhD from the University of British Columbia, 1967. His experience includes: research biologist, Montana Department of Fish and Game, 1959-63; research scientist for the Canadian Wildlife Service; and acting supervisor of mammal research, Canadian Wildlife Service. Dr. Jonkel is a member of the Provincial Polar Bear Committee, IUCM polar bear specialists, chairman pro tem of a grizzly bear group and associate editor of the Canadian Field Naturalist. He is also a member of the American Wildlife Society, American Society of Mammalogists, and American Institute of Biological Sciences.

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UNITED STATES DEPARTMENT OF AGRICULTURE
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TELEPHONE: 549-6511

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2610

ENVIRONMENTAL QUALITY
COUNCIL

AUG 6 1975 August 4, 1975

DIRECTOR'S OFFICE



Mr. Wesley Woodgerd, Director
Montana Department of Fish and Game
Helena, Montana 59601

Dear Wes:

We have reviewed the addendum for the hunting of grizzly bear to the Statewide Harvest of Big Game Animals Draft Environmental Statement and offer the following comments:

Item I. Purpose. One of the Department's management purposes is to reduce conflict between bears and livestock interests. Our question is, what data is available to substantiate that a conflict does exist? If it is available, it should be inserted in the statement as supporting information.

Item III. Description of the Existing Environment. In section A, Human Resources, it is intimated that there is a change in attitude among the livestock users about grizzly bears and their grazing "privilege." We are not aware that these changes are occurring. The grazing fee issue since 1969 has demonstrated that grazing permittees attach more than a "privilege" attitude to Federal land use. The tolerance or moderating of user attitudes toward grizzly bears is not well defined and this statement is more opinion than factual. The livestock owners and the associated grazing association on your mailing list will probably provide you with their opinions on this subject too!

In an effort to strengthen Item III, a map and a brief description of grizzly bear habitat should be included in this statement. This is an opportunity to demonstrate the depth of knowledge that does exist about the grizzly bear and its habitat. Also, we offer this interesting piece of information. The Whitefish Range is referred to as a heavily logged area; our information indicates that nearly half of the 1974 legal harvest came from this area. Is this an area where the grizzly bears are more accessible to the hunter or is the habitat more favorable to sustaining grizzly bear populations and thus providing more for the hunter?

Should be easy for Yellow's to copy

?

Good!

In section C, Land Use and Ownership, we offer the following data to strengthen this section. There are approximately 5.5 million acres of identified grizzly bear habitat on National Forest System lands in Montana. Approximately 28 percent is classified as Wilderness or Primitive Areas, 17 percent has been identified as "New Study Areas" and 12 percent is identified as Roadless Areas. Over 60 percent of the National Forest System lands grizzly bear habitat is in nearly pristine condition.

1. Good habitat
2. quant. habitat (rough)

The ^①uses on these lands should be more clearly defined so that the reader can determine the ^②amount of use in relation to the grizzly bear populations and its habitat.

In section G, Transportation Systems, the second sentence refers to the best hunting areas. If the Department has documentation of the good hunting areas based on hunter harvest records, then this statement should reflect this source of data.

economic benefits or loss

Item IV. Evaluation of Environmental Impact. It has been our experience in the evaluation portion of environmental statements to provide the best economic analysis that is available. Certainly, to hunt or not to hunt grizzly bears definitely has an economic impact on the outfitters and guides. This clarification of the dollar values can be beneficial, particularly to the uninformed public.

In subsection 2 of section A, we suggest the deletion of "and so far as is known" from the last sentence. This phrase weakens the base of information the Department has collected over the past 7 years.

Good

The alternatives in section C should be expanded to include physical and environmental impact of each alternative. The purpose of the environmental statement should be to display the facts and alternatives and not to justify the current or desired direction.

Section E, Irreversible and Irretrievable Commitment of the Resources - refers to "the slow and steady destruction of grizzly habitat through 'land development' programs, especially logging, clear cutting in key areas. . . etc." Obviously, there is a difference of opinion in the definition or use of the word "destruction." In the development of management guidelines for the "Yellowstone Ecosystem" one item of considerable discussion was the prohibition of clear cut units in close proximity to resorts, campgrounds, summer homes, etc. This concern was expressed because of the belief that these harvested areas would attract grizzly bears because of the food supply provided the bear. There appears to be a difference of opinion that needs to be clarified for the benefit of this statement and future management of grizzly bear habitat. In our opinion, to

destroy habitat is to permanently remove it from the base. For example, a road removes a quantity of area from the base resource; a subdivision would do likewise. Logging practice such as clear cutting does not permanently destroy the capability of the land to grow trees and the same for a wildfire. The vegetative components are removed or altered temporarily, and through the vegetative successional process and time, the vegetation will be restored.

The development of habitat coordination guidelines is one of the primary objectives of the cooperative grizzly bear study in which the Forest Service is participating. The five agency study was funded this fiscal year, and we are optimistic about obtaining viable information that will benefit the grizzly bear and its habitat in the future.

In general, we feel the addendum to the draft environmental statement can be strengthened with more objectivity and less advocacy. A statement of goals and objectives for the management of the grizzly bear and its habitat will improve this statement. For example, the grizzly bear population to be maintained and/or sustained and the habitat required as well as the habitat modifications (timber harvest programs, etc.) that will aid in accomplishing these objectives.

The Forest Service has supported the management of the grizzly bear as part of the natural resources on National Forest lands. We must continue to cooperatively work together on the improvement of our knowledge and techniques for the benefit of this animal.

We appreciate the opportunity to review and comment on this addendum to the draft environmental statement.

LeRoy Jovan
 STEVE YURICH
 for Regional Forester

*also
 people
 pressure*

*although not necessarily
 of the same
 kind*

*long range
 goals and
 objectives*



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8 July 75

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JUL 10 1975
ENVIRON. RESOURCES

Dear Jim -

Re: Grizzly addendum

see Section III C; 3RD

sentence.

"OUTSIDE" may not be the
proper word, as wilderness also
is grayable by domestic stock.

Ed.

Board of Directors:

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UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE

P. O. Box 970, Bozeman, Montana 59715

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JUL 11 1975
ENVIRON. RESOURCES
July 10, 1975

Mr. James A. Posewitz, Administrator
Environment and Information Division
Montana Department of Fish and Game
Helena, Montana 59601

Dear Mr. Posewitz:

We have reviewed the draft environmental statement--addendum number one to "Annual Statewide Harvest of Big Game Animals"--provided by your department and have no comments to offer.

Sincerely,

Van K Haderlie
Van K Haderlie
State Conservationist





UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

711 Central Avenue
Billings, MT 59102

July 23, 1975

RECEIVED
JUL 24 1975
DIRECTOR'S OFFICE

Mr. Wesley Woodgerd, Director
Montana Department of Fish and Game
Helena, MT 59601

Dear Mr. Woodgerd:

This is to acknowledge receipt of Mr. Posewitz's letter of July 2, 1975, with an attached addendum to the Montana statewide big game hunting season impact statement which addresses the subject of hunting of grizzly bear. We have no comments on the addendum.

Our observations on the statement are being passed through FWS channels for the information of higher authority.

Sincerely,

Burton W. Rounds
Area Manager

