

Chapter 5 Responses to Comments

This chapter shows responses to public comments received by the Forest Service regarding the Draft Environmental Impact Statement (DEIS) for the Forest Plan Amendments for Grizzly Bear Conservation for Six National Forests in the Greater Yellowstone Area.

The 90-day comment period ended November 12, 2004. The Forest Service received 675 original responses and 44,984 organized campaign responses. These responses were analyzed using a process called content analysis. The content analysis was completed in February 2005. Responses to comments are detailed in this chapter. All correspondence is retained in the project file.

Although this summary and accompanying list of public concerns attempts to capture the full range of public issues and concerns, it should be used with caution. Respondents' comments do not necessarily represent the sentiments of the public as a whole. The summary attempts to provide fair representation of the wide range of views submitted. In considering these views, it is important for the public and decision makers to understand that this process does not attempt to treat input as if it were a vote. Instead, the content analysis process ensures that every comment is considered at some point in the decision process.

Content Analysis Process

Content analysis is a method adapted by a specialized Forest Service unit, the Content Analysis Team, for analyzing public comment on a variety of land and resource management policies and proposals. This method employs both qualitative and quantitative approaches. It is a systematic process designed to provide a mailing list of respondents, isolate specific comments by topic in each response, evaluate similar comments from different responses, and summarize like comments as specific concern statements. The process also provides a relational database from which various types of reports can be generated while linking comments to original letters.

Through the content analysis process, analysts strive to identify all relevant issues, not just those represented by the majority of respondents. The breadth, depth, and rationale of each comment are especially important. In addition to capturing relevant factual input, analysts try to capture the relative emotion and strength of public sentiment behind particular viewpoints, in order to represent the public's viewpoints and concerns as fairly as possible. Analysts organize the concern statements to facilitate systematic review and response by decision makers.

About this Chapter

This chapter is an overview of public comments on the DEIS and forest plan amendment and a discussion of respondents' main areas of concern. This summary is not intended to provide an exhaustive account of public concerns. For detailed concerns and site-specific comments, see the public concerns areas. The formal list of public concerns identified during the content analysis process is organized topically into six areas:

- Process and Planning includes comments on the decision making process and public involvement
- Alternatives and Environmental Impact Statement includes comments directed specifically to the alternatives and DEIS
- Natural Resource Management includes requests for specific area, wildlife, domestic livestock, and other resource management
- Transportation and Recreation Management includes comments on motorized access, road and trail impacts, and recreational impacts in the GYA
- Land Management includes requests for special land designations
- Social Concerns includes comments related to demographics, economic impact, and public education.

Each formal statement of concern is associated with one or more sample comments, which provide respondents' specific perspectives and rationales regarding that concern. Sample comments can be found in the Summary of Public comment report, available at http://www.fs.fed.us/r2/shoshone/projects/planning/forest_projects/grizzly_bear_amendment/gb_deis_content_analysis.pdf. For each sample comment in the report, a letter number is provided, enabling the reader to track and review the original response. The list of concerns is intended to capture the full range of concerns regarding this project. This chapter provides a topical review of voluminous comment in a format that aids in careful consideration and agency response.

Forest Service responses, in italics, follow each concern area.

Overview of Public Comment

Public comment on the DEIS was far-reaching, often highly detailed, and represented a wide range of values and perspectives with respect to grizzly bear management and area management in general.

Respondents expressed different views regarding the proposed forest plan amendments in the DEIS. In general, people took one of two positions: preservation management as an objective of the Forest Service with support for continued federal protection of grizzly bears, or multiple use management of national forests with support for delisting grizzly bears as this is seen as a positive step toward more state and local management of public lands.

Many respondents felt Alternative 2 was the best option for grizzly bears and the GYA because it allowed for multiple use management of public lands. These writers assert the Forest Service, as mandated in the NFMA, should manage for "sustained yields of multiple use." A number of respondents value motorized recreational use of public lands and feel Alternative 2 adequately accounted for this recreational activity. Additional multiple uses of value included livestock grazing rights and natural resource development. Other writers suggest Alternative 2 is supported by science and maintains consistency with other Forest Service plans. As one respondent stated, "More restrictive policies and standards are not required for grizzly management," and "The recovered population is no longer threatened or endangered."

Others believed Alternative 1 is the best option because current forest plans provide suitable and adequate amounts of habitat for recovery of a viable grizzly bear population; what is not broken does not need to be fixed. "The current plans are working—they brought about the recovery." There is a perception that Alternatives 2, 3, and 4 would impose more restrictions on multiple uses of public lands.

On the other hand, a number of respondents viewed Alternative 4 as the best alternative, given its emphasis on protected grizzly bear habitat. These writers stated Alternative 4 is the environmentally preferred option and it is the only option to provide adequate protection for long-term grizzly bear survival.

A number of others mentioned the Forest Service should prohibit resource development and livestock grazing on public lands in the interest of preserving natural wildlife and wild and pristine areas. One respondent described the Forest Service as the "stewards of our natural, national heritage." Still another respondent expressed the philosophy of many preservation management respondents that limitations on human uses are a worthwhile sacrifice "in order for the grizzly to survive and continue its protection."

These different views frame the significant number of requests made by the public. Respondents submitted many requests for modification of alternatives regarding grizzly bear management and the proposed management of the GYA. These numerous requests relative to specific areas of management, in conjunction with all other concerns raised by the public, reveal how important Yellowstone grizzly bears and the GYA are to the public.

Decisionmaking and Planning Process

Decisionmaking

Decisionmaking process and methods

1. The Forest Service should make an integrated forest plan revision, as required by law.
 - To include new information in addressing grizzly bear conservation needs
 - With fair evaluation of actions and concise disclosure of decisionmaking rationale
2. The Forest Service should focus on the implementation of its management plans and minimize time spent in the planning phase.

Response

Amendments to the existing forest plans are the appropriate way to incorporate management direction for the grizzly bear because the proposed action does not propose to change management prescriptions or alter management area boundarie and does not propose to alter the desired future condition of the land and resources. Rationale for completing forest plan amendments rather than forest plan revisions is discussed under analysis of significance under the NFMA, FEIS section 3.19.

Chapter 3 discloses the effects of the proposed action and all alternatives studied in detail and has been updated to include new information on grizzly bear conservation needs, specifically on grizzly bear mortality and food sources.

The Forest Service has limited the amount of time spent in the planning phase by incorporating analysis for all six GYA national forests into one environmental impact statement, rather than producing six environmental impact statements, allowing more focus on implementation of the management plans.

Decisionmaking authority

3. The Forest Service should assert its proper decisionmaking authority.
 - Despite pressure from commercial interests
 - Despite pressure from politicians and private industry
 - Despite pressure from the administration
 - Despite pressure from conservation interest groups
 - To meet public needs
4. The Forest Service should recognize that the administration favors commercial interests.
 - Which threatens our heritage

Response

The purpose of the proposed action is to ensure conservation of habitat to sustain the recovered grizzly bear population. Efforts to recover the grizzly bear population have been ongoing since 1975 when the grizzly bear was listed as a threatened species under the ESA. The development of the Conservation Strategy began in 1993. Management efforts directed toward recovery and the development of the Conservation Strategy have been ongoing through various administrations, with input from many different public interests. The Forest Service does intend to meet the purpose and need while informing and involving the public through the NEPA process, using proper and appropriate public input.

Coordination and consultation with other agencies

5. The Forest Service should coordinate with local governments.
6. The Forest Service should make its plans and proposals available to all local elected officials.
7. The Forest Service should create a transboundary grizzly bear recovery process in collaboration with relevant agencies.

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8. The Forest Service should coordinate with Idaho Fish and Game and the Idaho Department of Transportation to address grizzly bear habitat connectivity.
9. The Forest Service should address grizzly bear management challenges between Canada and the United States.
10. The Forest Service should consult with the Fish and Wildlife Service.
 - To develop an adequate grizzly bear management plan
 - To address Endangered Species Act compliance
11. The Forest Service should share information regarding grizzly use of private lands among other agencies.
 - To protect grizzly bear habitat and resolve human-grizzly bear conflicts
12. The Forest Service should address the potential effects of travel restrictions on Natural Resource Conservation Service surveying activities.

Response

The Forest Service has cooperated with agencies and local governments, including counties, in the development of the EIS and has made all Forest Service planning efforts related to the grizzly bear readily available to the public, as required by NEPA. All recent public documents are available at the Web site

http://www.fs.fed.us/r1/wildlife/igbc/Subcommittee/yes/YEamend/gb_internet.htm

A transboundary recovery process has essentially been in effect for the grizzly bear in the GYA (FEIS section 1.1). The Forest Service will continue coordination with the State of Idaho through membership in the YES. At the international level, Canadian interests are represented on the IGBC. The Yellowstone grizzly bear population is the only population of grizzlies in the lower 48 states not connected with Canadian populations. Recovery efforts for the Cabinet-Yaak, Selkirk, Northern Continental Divide, and North Cascades grizzly bear populations are coordinated with Canada.

The Forest Service consulted with the USFWS on this proposal. The USFWS has addressed threats to habitat, threats to population through disease or other forms of take, adequate regulatory mechanisms, and other factors as part of a Status Review (USDI FWS 2005a). Information would continue to be shared through the YGCC, should the grizzly bear be delisted. Local governments would be represented on the YGCC by three county commissioners, one each from Idaho, Montana, and Wyoming. The commissioners would provide input to the YGCC and keep local government agencies informed (FEIS section 3.13.1). This coordination is common to all action alternatives.

For Alternatives 1, 2, and 2-Modified, no effects are anticipated on access needs for Natural Resource Conservation Service snow surveying activities. Alternatives 3 and 4 could decrease administrative access needed for Natural Resource Conservation Service snow surveying (FEIS section 3.10).

Consistency with other plans

13. The Forest Service should ensure that grizzly bear habitat is managed both inside and outside the Primary Conservation Area in accordance with the Conservation Strategy.
14. The Forest Service should reconcile conflicting information in the Draft EIS and Targhee Forest Plan with regard to grizzly bear mortality rates.

Response

All the action alternatives incorporate the habitat standards from the Conservation Strategy inside the PCA. The Forest Service would cooperate with states in implementing state management plans outside the PCA and would monitor the key items related to management of bear habitat, including secure habitat, livestock allotments, developed sites, habitat effectiveness, and whitebark pine. Any decline in population would be evaluated with all other monitoring

information, which would be summarized on an annual basis by the IGBST and submitted to the YGCC. Significant deviations could result in a Status Review of the grizzly bear.

The DEIS quoted the 1994 report which stated that nine grizzly bears had been killed in the Plateau BMU on the Targhee National Forest. The 1997 Revised Targhee Forest Plan stated that six grizzly bears had been killed in the same BMU. The documented mortality records were rechecked and the correct number is six. The error has been corrected in the FEIS.

Consistency with other regulations, policies, and laws

15. The Forest Service should maintain consistency with the National Forest Management Act.
 - Including Subpart A - National Forest System Land and Resource Management Planning, Sec. 219.1 - Purpose and Principles
 - In addition to the National Environmental Policy Act
16. The Forest Service should comply with Executive Order 13112.
 - To control noxious weeds and invasive species
17. The Forest Service should recognize the importance of Sections 7 and 9 of the Endangered Species Act has in protecting the grizzly bear.
18. The Forest Service should comply with federal environmental justice requirements.
19. The Forest Service should comply with the goals of multiple use policies and laws.
20. The Forest Service should ensure that all national forests maintain consistency with the Roadless Area Conservation Rule.
21. The Forest Service should address the effect of Idaho's Bill Number 844 on the implementation of the standards proposed in the Draft EIS.

Response

The six forest supervisors for the GYA national forests will decide for their respective national forests. Because the actions are similar for this proposal, one EIS can be used to disclose the effects of the actions

See section 3.10 in the FEIS for discussions of how lands will be managed with roads and of the long-term effects on long-term resource management.

The Forest Service complies with Executive Order 13112 in the control of noxious weeds.

Concerning Sections 7 and 9 of the ESA, the Forest Service complies with consultation requirements and prohibited acts of the ESA. The Forest Service prepared biological assessments to comply with Section 7 requirements.

All alternatives were developed within the framework of existing laws, including the Multiple Use Sustained Yield Act, the ESA, and the NFMA. Regarding management of roadless areas, the Forest Service will comply with the Final Rule (USDA Forest Service 2005f).

Environmental justice is discussed in the context of fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development and implementation of this amendment (FEIS section 3.15). The impacts of potential motorized routes closures on motorized users were considered, although motorized users are not considered a minority or part of environmental justice. Effects on motorized use are discussed in the FEIS in section 3.9.4.

Idaho House Bill No. 844 was introduced into the Idaho House of Representatives in 2004. This bill dealt in part with federally granted rights-of-way on public lands, also known as "2477 rights-of-way." This bill was not passed by the Idaho Legislature and did not become law. Therefore, this bill does not affect implementation of the standards and guidelines in the FEIS.

Decisionmaking philosophy

22. The Forest Service should favor bears in grizzly bear management decisions.

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23. The Forest Service should prioritize the protection of the environment in grizzly bear management decisions.
 - Despite pressure from interest groups
 - To preserve nature for future generations
24. The Forest Service should favor human needs in grizzly bear management decisions.
 - Because humans have a place in the natural environment
 - Including decisions to close motorized roads and trails
 - Including the need for recreational roads and trails
25. The Forest Service should manage public lands for local communities.
26. The Forest Service should manage public lands for tourism.
27. The Forest Service should accurately represent the role of ecology in sustained yield and multiple use management without elevating the importance of species diversity above congressional mandates.

Response

The purpose of the proposed action is to ensure conservation of habitat to sustain the recovered grizzly bear population. Efforts to recover the grizzly bear population have been ongoing since 1975 when the grizzly bear was listed as a threatened species under the ESA. The development of the Conservation Strategy began in 1993. Management efforts directed toward recovery and the development of the Conservation Strategy have been ongoing through various administrations, with input from many different public interests

Multiple use management emphasis

28. The Forest Service should emphasize multiple-use of public lands.
 - To avoid limiting individual freedoms
 - To meet the needs of the public
 - To provide balance between protection of the environment and human needs
 - While maintaining current Yellowstone Park boundaries
 - Because grizzly bear recovery is at an adequate level
 - To adequately provide for motorized recreationists needs

Response

All alternatives analyzed in detail comply with the Organic Act, the Multiple Use Sustained Yield Act, and the NFMA.

Ecosystems management emphasis

29. The Forest Service should incorporate natural ecological processes in managing grizzly bear habitat.
30. The Forest Service should adopt a broader vision of ecosystem connectivity to provide for likely environmental changes.

Response

Alternative 4 was developed in response to comments requesting the Forest Service to extend grizzly bear habitat protection beyond the PCA. The purpose was to address the potential future loss of major bear foods, increase the probability of habitat connectivity with other ecosystems, improve linkage and connectivity between key habitats within the six GYA national forests, and further reduce the potential for grizzly bear/human conflicts and bear mortality throughout the GYA (FEIS section 2.1.5). In Alternative 4, ecological processes such as fire would have a greater role in changing composition and structure of the landscape because road closures could lead to longer response times and larger fires across the GYA based on current fire management capabilities. Alternative 2- Modified also considers habitat guidance outside the PCA for accommodating an expanding grizzly bear population.

Public Involvement

Use of public comment

31. The Forest Service should avoid using public comments as a voting process.

Response

The Forest Service does not count the numbers of respondents as numbers of votes, but rather considers the content of responses in modifying or adding alternatives. While the number of people commenting may indicate strength of support, the Forest Service does not always choose the popular alternative but rather the alternative that best meets the purpose and need within the various applicable laws.

Agency communication

32. The Forest Service should present any decision to restrict or close access to the public prior to approval or action.

33. The Forest Service should simplify the EIS to increase general public involvement.

This amendment does not make any site-specific decisions to restrict or close access. Any site-specific actions to restrict access would go through NEPA and a public comment period. The EIS was simplified as much as possible. A summary of the FEIS is available.

Adequacy and availability of information

34. The Forest Service should request that the Department of the Interior disclose land use statistics to the public.

35. The Forest Service should disclose all potential effects of its decisions on human use in compliance with the National Environmental Policy Act.

Response

This amendment focuses on habitat management for National Forest System lands as managed by the USDA Forest Service. All significant effects on the physical, biological, and economic and social environments, including human uses, are described in the FEIS.

Public meetings

36. The Forest Service should schedule public meetings at times that will allow for higher attendance.

Response

Meetings were scheduled to best meet the needs of the public – usually from 4 to 7 p.m. (immediately after work or shortly after dinner). The Forest Service was also available upon request to meet with groups.

Collaboration

37. The Forest Service should expand public involvement in grizzly bear management.

38. The Forest Service should provide incentives for community leadership development to teach non-lethal deterrent methods and sanitation measures.

39. The Forest Service should collaborate with non-governmental organizations to create a grizzly bear recovery team.

40. The Forest Service should collaborate with independent scientists to review the science used in grizzly bear management plans.

41. The Forest Service should sponsor a workshop to improve grizzly bear monitoring methods in collaboration with scientists and conservationists.

42. The Forest Service should consult with conservation groups and local forests to address concerns regarding grizzly bear habitat connectivity.

43. The Forest Service should collaborate with motorized recreationists.

- To ensure sensitivity to the needs of grizzly bears
- To perform and obtain funding for trail maintenance

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- To arrive at a more balanced management perspective
 - Because the written comment process is intimidating to the public
 - Because the National Environmental Policy Act encourages direct coordination
 - Because mailings and telephone interviews do not accurately represent public land users
 - In the travel planning process
44. The Forest Service should cooperate with livestock producers.
- To develop grazing plans that would mitigate depredation by grizzly bears
 - To communicate the potential effects of the proposed actions

Response

Public involvement has been extensive in the development of the Conservation Strategy, the DEIS, and this FEIS. Public meetings were held throughout the GYA in the development of the Conservation Strategy; five more were held on the DEIS. Nearly 100,000 comments were received on scoping before preparation of the DEIS and during the comment period for the DEIS.

The IGBST is the science team focused on research and monitoring of the Yellowstone grizzly bear population and its habitat. It is comprised of individuals from various state and federal agencies in the GYA. Individuals from non-governmental organizations have not been included, partly because of the advisory nature of the IGBST study team to federal land management agencies. The Federal Advisory Committee Act requires such committees to be comprised of government agency employees unless legislatively authorized to include non-agency members.

Some financial incentives are available in the form of grants to local communities to address sanitation concerns adjacent to bear habitat. Rural Community Assistance grants are sometimes available for these purposes. Information, education, and training on the use of deterrents such as bear pepper spray are available to field going personnel on GYA national forests and to outfitters, guides, and others with permits for using the National Forest System lands in the GYA. The IGBC has a policy recommending that individuals use bear pepper spray as a deterrent.

Independent scientists were requested by the USFWS to review the genetic management for the grizzly bear as described in the Conservation Strategy, resulting in a peer-reviewed article published in the National Academy of Sciences (Miller and Waits 2003). See the response to comments 45 and 46.

Concerns on habitat connectivity were raised during scoping and led to the development of Alternative 4. Input from independent scientists and non-governmental organizations was used in the development of this alternative.

Use of Science

45. The Forest Service should make decisions based upon science.
- Despite political pressure
 - Despite pressure from the administration
 - To better serve the public
46. The Forest Service should reevaluate the scientific basis used to justify grizzly bear delisting.
- Because of additional unstudied cumulative effects
 - To ensure grizzly bear recovery

Response

The proposed action was based on the best available science. The Conservation Strategy—the basis for the habitat standards in the proposed action—was developed through a cooperative effort with biologists and scientists from the USFWS, U.S. Geological Survey, Forest Service, BLM, and the Idaho, Montana, and Wyoming state wildlife management agencies. All relevant scientific peer-reviewed information was considered in the development of the Conservation

Strategy and the FEIS. A listing of that information can be found in appendix H. Input from other scientists and the public was solicited throughout the development of the Conservation Strategy. The Yellowstone grizzly bear population and its habitat have been the consistent focus for research and monitoring by the IGBST for 30 years. The IGBST was a key player in the development of the Conservation Strategy; all information generated through this long-term research and monitoring effort was directly available in the development of the Conservation Strategy. Alternative 2-Modified incorporates some additional direction and guidance for grizzly bear habitat management beyond that noted in the DEIS and the Conservation Strategy.

Alternatives 3 and 4 propose higher levels of habitat protection than identified in the Conservation Strategy. The boundary of Alternative 4 was delineated based on peer-reviewed scientific publications that suggested this area could be occupied by grizzly bears.

Work on the Conservation Strategy progressed through several national and state administrations. The direction for the development of the Conservation Strategy did not change course with changes in administration. The purpose of the Conservation Strategy and these amendments is to ensure the conservation of habitat to sustain the recovered grizzly bear population and not to benefit any special interest (FEIS section 1.2).

The habitat standards proposed in the FEIS are just part of the larger package of the Conservation Strategy, which contains population standards and monitoring requirements as well as the individual state grizzly bear management plans. Hunting, under state direction, may indeed be a part of the future management of the Yellowstone grizzly bear population; mortality quotas and grizzly bear population numbers must be maintained at the levels identified in the Conservation Strategy. Food sources would be monitored, as would the adherence to the habitat standards. All monitoring information would be summarized annually by the IGBST and reviewed by the YGCC. Deviations from identified standards or changes in the availability of important foods could lead to a Biology and Monitoring review or Status Review, depending on the circumstances. The Conservation Strategy is designed to be an adaptive document and would be reviewed and updated as necessary to incorporate new science. See chapter 6 of the Conservation Strategy for a complete description of how the Conservation Strategy would be implemented.

See section 3.16 in the FEIS for a discussion of cumulative effects on the grizzly bear population. The population monitoring information in the FEIS has been updated to include IGBST data from 2004 (section 3.3.2).

The decision to delist the grizzly bear is the responsibility of the USFWS; the USFWS will consider the habitat protections for the grizzly bear identified in the preferred alternative in this FEIS, along with the Conservation Strategy, the state grizzly bear management plans, NPS habitat direction, and many other factors in that process.

Adequacy of analysis

47. The Forest Service should conduct an accurate analysis of the cumulative effects of the current proposal.
48. The Forest Service should consider that its analysis of the effects of the proposal is adequate.
49. The Forest Service should compare natural environmental impacts to human-caused impacts in its analysis.
50. The Forest Service should use current information in the Final EIS.
51. The Forest Service should clarify the maps and figures in the Draft EIS.

Response

The cumulative effects analysis has been updated in section 3.16 in the FEIS. Chapter 3 presents the environmental impacts of the proposal and the alternatives in comparative form, which defines the issues and provides a clear basis of choice among options. Current information is used in the FEIS, which includes updated mortality data. Maps and figures have been added.

Agency organization, funding, and staffing

52. The Forest Service should ensure adequate staffing and funding of law enforcement.
 - To properly implement grizzly bear management policies
53. The Forest Service should direct funding to rural communities to reduce human-grizzly bear conflicts.
54. The Forest Service should ensure adequate funding is available to implement grizzly bear management plans.
 - To ensure that adequate habitat quality is maintained
 - Including monitoring and relocation programs
 - Including enforcement of plans
55. The Forest Service should ensure that states have adequate plans to fund grizzly bear management plans after delisting occurs.
56. The Forest Service should ensure individual employee prioritization of grizzly bear protection.
57. The Forest Service should establish criteria for the selection of expert scientists.

Response

The budget to implement the various alternatives is discussed in section 3.14 of the FEIS. Outreach and education, grizzly bear/human conflict management and sanitation, and monitoring are recognized as costs of implementation. Law enforcement is assumed to remain at the same level that has occurred while the bear populations met recovery objectives. Grants are available for local communities to assist in resolution of grizzly bear/human conflicts through the State and Private Forestry division of the Forest Service; other sources of grants may be available. Federal dollars designated for management of National Forest System lands would not be available for states or communities to use. The interdisciplinary team ensured that the environmental analysis was accomplished with scientific integrity using best available science. Any methodologies used and scientific and other sources were appropriately referenced; criteria for selection of expert scientists were not part of the decisions to be made. The Conservation Strategy was based on the best available science (see response to comments 45 and 46).

EIS Document Considerations

Multiple and general concerns

58. The Forest Service should avoid the premature removal of Endangered Species Act protections.
59. The Forest Service should minimize the chance of relisting the grizzly bear if delisting occurs.
60. The Forest Service should not add the grizzly bear to the sensitive species list upon delisting.
61. The Forest Service should turn over the creation of management plans to grizzly experts in the event that the grizzly bear is delisted.
62. The Forest Service should augment the grizzly population in the Selway and Bitterroot ranges under full Endangered Species Act protections.

Response

The USFWS has responsibility for removing a species from protection under the ESA. If the grizzly bear were delisted, monitoring would focus on evaluation of implementation of the habitat standards identified in the Conservation Strategy. Monitoring of other important habitat parameters would provide additional information to fully evaluate the status of the habitat for supporting the recovered grizzly bear population and the effectiveness of habitat standards. Upon delisting, all monitoring information would be submitted to the IGBST on an annual basis and included as part of the Annual Report, as required by the Conservation Strategy. Concerns created from either population or habitat monitoring could result in a Biology and Monitoring

Review by the IGBST. The YGCC would meet twice a year and evaluate the need for changes in management direction. The Conservation Strategy could be updated by the management agencies every five years or as necessary, allowing public comment in the updating process. Similarly, the land management plans for the GYA national forests could be updated as needed. A complete description of evaluation, reporting, and monitoring is included in chapter 6 of the Conservation Strategy.

Once the grizzly bear is removed from protection under the ESA, it would be designated a Forest Service sensitive species (Forest Service Manual 2670.22, 2670.32, 2672.1, and 2672.11).

Augmentation of the Selway-Bitterroot grizzly bear population is not part of the purpose and need for sustaining the recovered Yellowstone grizzly bear population.

Purpose and Need and Scope

63. The Forest Service should continue to propose grizzly management activities as stated in the Purpose and Need section of the Draft EIS.
64. The Forest Service should include quotes from those in favor of Alternative 4 in the Draft EIS section entitled “Economic Effects of Grazing.”
65. The Forest Service should include a detailed map to determine where the Primary Conservation Area boundaries lie along the eastern Centennial Mountains.
66. The Forest Service should include a glossary or definitions page in future EIS drafts.
67. The Forest Service should update the Draft EIS to reflect current management language.

Response

In section 3.13.2 of the FEIS, attitudes, beliefs, and values of different groups are sometimes best expressed by the use of quotes. The FEIS attempts to display a balanced view of the different groups throughout chapter 3.

Maps that are more detailed are part of the planning record. A detailed map was sent to the commenter.

The FEIS has been updated to reflect current management language for the Caribou-Targhee National Forest. The FEIS includes definitions for uncommonly used terms and a list of acronyms used in the document (appendix I).

Other grizzly management plans

68. The Forest Service should address the inadequacies of post-delisting state management plans.
69. The Forest Service should not entrust the state of Montana with grizzly bear management.
 - Because the Montana plan is inadequate
 - Because the Montana plan wrongly identifies its tools for grizzly management
 - Because the Montana plan proposals for grizzly habitat management are ineffective
 - Because the Montana plan proposals for population monitoring are ineffective
 - Because the Montana plan policies favor development
 - Because the Montana plan does not protect grizzlies from humans
 - Because the Montana plan does not commit to protection of livestock and property damage
 - Because the Montana state plan manages grizzlies outside the Primary Conservation Area as game animals
70. The Forest Service should ensure Montana clarifies vague references in their state plan.
71. The Forest Service should ensure that Montana clarifies its hunting policies

Response

State plans are included as Appendices K, L, and M of the Conservation Strategy, and are summarized in section 1.1 of the FEIS. Changing state plans is outside the scope of the purpose and need. The proposed action focuses on habitat management for sustaining the recovered

grizzly bear population; population management is the responsibility of the states once the USFWS delists the grizzly bear.

Technical and editorial

72. The Forest Service should clarify on page 155 which forests will have to close roads and the mileage of these closed roads.
73. The Forest Service should fill in the blank field present in the chart on page 41 under Standard for Food Sources under Alternative 2.

Response

Forests that would have to close roads and the associated miles for Alternatives 3 and 4 are displayed in section 3.10 of the FEIS. The blank field in figure 8 of the DEIS indicated that there was no direction proposed for food sources in Alternative 2. Alternative 2-Modified contains direction on food sources.

ESA Delisting

Delisting of the grizzly bear

Delisting—general considerations

74. The Forest Service should continue with plans to designate the grizzly bear as recovered.
75. The Forest Service should not delist the grizzly bear from the endangered species list.

Delisting—planning considerations

76. The Forest Service should delist the grizzly bear from the endangered species list.
 - So states can manage the grizzly bear
77. The Forest Service should not delist the grizzly bear from the endangered species list.
 - To be consistent with the Endangered Species Act
 - Because there is not an adequate post-delisting plan which responds to changes in the environment or habitat quality
 - Because there is little chance of relisting the grizzly if population plummets

Delisting—trust and integrity considerations

78. The Forest Service should not delist the grizzly bear from the endangered species list.
 - Because states are more vulnerable to pressure from corporations and politicians
 - Because states lack the resources to manage the grizzly after delisting

Delisting—public involvement/support considerations

79. The Forest Service should not delist the grizzly bear from the endangered species list.
 - Because of those who contributed to grizzly bear recovery efforts

Delisting—balanced management considerations

80. The Forest Service should delist the grizzly bear from the endangered species list.
 - Because it is in the best interest of the grizzly bear as well as resource users

Delisting—resource management considerations

81. The Forest Service should delist the grizzly bear from the endangered species list.
 - And also allow for protection of the livestock industry
82. The Forest Service should not delist the grizzly bear from the endangered species list.
 - To prevent oil and gas development
 - Because of continual human encroachment on animal habitat

Delisting—environmental and wildlife considerations

83. The Forest Service should delist the grizzly bear from the endangered species list.
 - Because the population is expanding

- Because the grizzly has met its recovery goals
 - Because potential risks with regard to food sources will always exist
84. The Forest Service should not delist the grizzly bear from the endangered species list.
- To protect our natural resources
 - To protect all wildlife
 - To protect natural diversity
 - Because the grizzly is a national treasure
 - To ensure the grizzlies' long-term recovery
 - To prevent grizzly extinction
 - Because of threats to grizzly habitat
 - Because grizzlies play a pivotal role in ecosystem balance
 - To protect all western grizzly populations
 - Because population numbers are too low
 - Because of declining food sources
 - Because of high mortality rates
 - Because grizzly populations are only at 1% of their former numbers

Delisting—recreational considerations

85. The Forest Service should not delist the grizzly bear from the endangered species list.
- To prevent hunting of the grizzly
 - Because individual states may allow hunting

Delisting—social considerations

86. The Forest Service should not delist the grizzly bear from the endangered species list.
- To protect our own vitality
 - Because grizzlies have a value to individuals
 - To leave a legacy for future generations
 - Because humans are the stewards of the natural world

Delisting—economic considerations

87. The Forest Service should not delist the grizzly bear from the endangered species list.
- Because our environment is more important than any negative financial effects

Response

There were many comments with suggestions and opinions about whether the Forest Service should delist the grizzly bear from the list of threatened or endangered species under the ESA. The Forest Service, an agency of the U.S. Department of Agriculture, does not have the authority to determine whether the grizzly bear should be delisted or remain listed under the ESA. The USFWS, an agency of the U.S. Department of the Interior, has jurisdiction over species covered by the ESA. This distinction is clearly identified in sections 1.1, 1.2, 1.5, and 1.7.2 of the FEIS. The purpose of this FEIS is management of grizzly bear habitat on six national forests, as stated in section 1.2.

Alternatives General

Implementation of multiple alternatives

88. The Forest Service should implement Alternative 1 or 2.
- To maintain current acreage of multiple-use lands
89. The Forest Service should not implement Alternatives 1, 3, or 4.
90. The Forest Service should implement Alternative 3 or 4.
- Because they protect grizzlies
 - Because their Standard 8 oil and gas restrictions are better than Alternative 1 or 2

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- Because their motorized access restrictions are better than Alternative 1 or 2
91. The Forest Service should not implement Alternative 3 or 4.
- Because they are too extreme
 - Because other plans will not put the grizzly at risk
 - Because they do not emphasize multiple use management
 - Because they only protect the activities of special interests
 - Because increased regulation and restrictions are not needed
 - Because linkage corridors are not needed
 - Because they are not needed to protect the grizzlies
 - Because grizzlies are dangerous to humans
 - Because they eliminate grazing allotments
 - Because there would be a loss of off-road vehicle recreation opportunity
92. The Forest Service should implement a mix of Alternatives 3 and 4.
93. The Forest Service should not implement any of its four alternatives.
- Because a reduction of habitat and grizzly bears is needed

Response

The Forest Service will implement the alternative that best meets the purpose and need, which is described in section 1.2 of the FEIS as:

- *Ensure conservation of habitat to sustain the recovered Yellowstone grizzly bear population*
- *Update the management and monitoring of grizzly bear habitat to incorporate recent interagency recommendations and agreements, as described in the Conservation Strategy*
- *Improve consistency among GYA national forests in managing grizzly bear habitat*
- *Ensure the adequacy of regulatory mechanisms for grizzly bear habitat protection upon delisting as identified in the Recovery Plan*

Alternative 2-Modified is the preferred alternative. The rationale for the selected alternative and why other alternatives were not selected will be discussed in the Record of Decision.

Modification of alternatives

94. The Forest Service should eliminate subjective statements from the alternatives.
95. The Forest Service should reexamine Standard 4 under Alternatives 2, 3, and 4.
- Because there is a funding and enforcement problem
 - Because the mortality threshold has been exceeded

Response

Subjective statements, particularly on sheep grazing and plants, were edited. Standard 4, which states that the IGBC Guidelines and management by situations would no longer apply, was not included in the Alternative 2-Modified.

Alternative 1

Implementation of Alternative 1

Implementation—general considerations

96. The Forest Service should implement Alternative 1.
97. The Forest Service should implement Alternative 1.
- Because current plans are adequate
 - To improve consistency among Greater Yellowstone Area national forest management strategies
 - Because it can incorporate recent interagency recommendations and agreements
 - To ensure the adequacy of regulatory mechanisms as identified in the Recovery Plan

98. The Forest Service should not implement Alternative 1.

- Because national forest plans may be outdated

99. The Forest Service should implement Alternative 1.

- Because it emphasizes multiple use management

Response

See responses to comments 88-93 and 102-103.

Implementation—general access considerations

100. The Forest Service should implement Alternative 1.

- Because loss of roads will have negative effects on forest-related activities

Response

No roads are expected to be lost, or decommissioned, in Alternatives 1, 2, and 2-Modified (FEIS section 3.10). Some roads are expected to be decommissioned in Alternatives 3 and 4. These are indirect effects projected for project level implementation of the standard for secure habitat.

Implementation—resource management considerations

101. The Forest Service should not implement Alternative 1.

- Because grizzlies have prospered under current management
- Because it does not provide certainty for grazing allotments

Response

See responses to comments 88 to 93 and 102 and 103.

Implementation—wildlife considerations

102. The Forest Service should implement Alternative 1.

- Because it conserves habitat to sustain the grizzly population

103. The Forest Service should not implement Alternative 1.

- Because other alternatives are better for the grizzly
- Because the grizzly would retain its status under the Endangered Species Act

Response

The Forest Service reviewed many comments about implementing or not implementing Alternative 1. Alternative 1 is the no action alternative, which is the grizzly bear habitat management direction currently found in existing forest plans. Under Alternative 1, all GYA forest plans have goals that provide suitable and adequate amounts of habitat for recovery of a viable grizzly bear population as identified in the Recovery Plan (FEIS section 2.1.1). The existing grizzly bear management direction in Alternative 1 was developed with the bear listed under the ESA, which also required consultation with the USFWS. As required by law, the Forest Service developed and analyzed other alternatives that incorporate the best available science about management of grizzly bear habitat and/or expands the amount of area that would receive grizzly bear habitat management direction. All action alternatives incorporate the habitat management direction contained in the Conservation Strategy and Alternatives 2-Modified and 4 propose additional management direction for areas outside the PCA. All action alternatives are proposed to go into effect when all partner agencies have signed the Conservation Strategy, the Final Rule delisting the Yellowstone grizzly population has been published in the Federal Register, and the Record of Decision has been signed for the Forest Plan Amendment for Grizzly Bear Habitat Conservation for the Greater Yellowstone Area National Forests (FEIS section 1.5). If the grizzly bear is not delisted, existing forest plan direction for grizzly bears (Alternative 1) will remain in place. Alternative 2-Modified is the preferred alternative. The rationale for the selected alternative and why other alternatives were not selected will be discussed in the Record of Decision.

Responses to Comments

Implementation—recreational considerations

104. The Forest Service should implement Alternative 1.

- Because more grizzlies will impact recreation

Response

The Forest Service is committed to sustaining a recovered grizzly bear population in the GYA. The Forest Service also recognizes the importance of public acceptance of grizzly bears toward “the ultimate success in perpetuating the bear’s recovery, public safety, and ease to which agencies can effectively manage for the bear” (FEIS section 3.13.2). Grizzly bear presence in an area can reduce some people’s use based on their comfort level with bears. Information and education along with active bear management to minimize conflicts can also alleviate some of these concerns (FEIS sections 3.9.4 and 3.13.2). Alternatives 1, 2, and 2-Modified focus management for the bear within the PCA and do not propose additional restrictions on access. Alternative 2-Modified is also proactive toward managing grizzly bear habitat as bear populations naturally expand beyond the PCA. Alternatives 3 and 4 propose additional restrictions on access and closing motorized routes, which would reduce opportunities for hunting and fishing.

Implementation—social considerations

105. The Forest Service should not implement Alternative 1.

- Because a larger grizzly population would further aggravate problems in local areas

Response

Comment letter #879 articulates the contributions of a local business toward accommodating grizzly bear populations as well as the economic and social impacts upon this business regarding increasing measures to ensure the safety of its owners, staff, and clientele. The Forest Service recognizes the importance of public acceptance of grizzly bears toward “the ultimate success in perpetuating the bear’s recovery, public safety, and ease to which agencies can effectively manage for the bear” (FEIS section 3.13.2). In all action alternatives, habitat measures with active management of grizzly populations by the states would occur to ensure public safety and to minimize grizzly bear/human conflicts. Grizzly bear/human conflicts would continue to be actively monitored and addressed through the YGCC (FEIS sections 1.1, 1.4, and 3.13.1).

Grizzly bear numbers are expected to stabilize or increase inside the PCA and bears will likely increase in occupation and use of habitats outside the PCA under all alternatives (FEIS section 3.3.6). Under Alternatives 2, 2-Modified, and 3, management direction outside the PCA would be based on the states’ definitions of socially acceptable and biologically suitable lands for the grizzly bear. Alternative 4 allows expansion of grizzly bears without consideration of the states’ definitions of socially acceptable habitats.

Implementation—economic considerations

106. The Forest Service should implement Alternative 1.

- Because it has the least impact on local economies
- To minimize the effects to the economy

Response

Many factors influence and affect local social and economic environments. Population growth, economic growth, economic diversity, and the management of National Forest System lands all affect local economies. One to two jobs could be lost in Alternatives 1, 2, and 2-Modified. Effects on economics are discussed in the FEIS section 3.14.

Inadequacies and Modifications of Alternative 1

107. The Forest Service should accurately and reasonably evaluate the no action alternative.

108. The Forest Service should modify Alternative 1.

- To comply with the National Environmental Policy Act

Response

Alternative 1, the no action alternative, fully complies with NEPA. It is described in section 2.1 of the FEIS and analyzed in chapter 3.

Alternative 2

Implementation of Alternative 2

Implementation—general considerations

109. The Forest Service should implement Alternative 2.

- Because it allows for handling problems on a case by case basis

110. The Forest Service should not implement Alternative 2.

- Because it is environmentally and economically unfit

Response

Alternative 2 was designed to address the purpose and need and to comply with national policy and direction. No site-specific actions that could be perceived as environmentally and economically unfit are proposed.

Implementation—planning considerations

111. The Forest Service should implement Alternative 2.

- Because it does not place more constraints than those already imposed
- Because it coincides with the grizzly bear Conservation Strategy
- Because it will make forest plans uniform
- Because otherwise state plans will be inconsistent with the amended forest plans
- Because it is scientifically sound
- Because it maintains current management which has proven to be successful
- Because Alternatives 3 and 4 do not adequately ensure responsible management

112. The Forest Service should not implement Alternative 2.

- Because it fails to address the problems in the Conservation Strategy
- Because the legal, scientific, and economic data is flawed

Response

Alternative 2 represents adoption of the habitat standards as described in the Conservation Strategy. The Conservation Strategy was based on the best available science (see response to comments 45 and 46). Alternative 2 was developed within the framework of existing laws, including the Multiple Use Sustained Yield Act, the ESA, and the NFMA. Alternative 2 was modified to better reflect concerns on grizzly bear habitat management. The rationale for the selected alternative and why other alternatives were not selected will be discussed in the Record of Decision.

Implementation—public involvement/support, balanced management, and general access considerations

113. The Forest Service should implement Alternative 2.

- Because it is most consistent with the desires of local residents
- Because locals are willing to work with land management agencies

114. The Forest Service should implement Alternative 2.

- Because it allows for balanced management
- Because maintenance of forests and fuel management needs can be coordinated with grizzly bear needs
- Because industry needs can be coordinated with grizzly bear needs

115. The Forest Service should implement Alternative 2.

- Because it allows temporary roads

Response

Alternative 2 represents adoption of the habitat standards as described in the Conservation Strategy and would allow multiple use while sustaining the recovered grizzly bear population. The rationale for the selected alternative and why other alternatives were not selected will be discussed in the Record of Decision.

Implementation—resource management considerations

116. The Forest Service should not implement Alternative 2.

- Because it allows land managers discretion of secure habitat designation
- Because it has too many loopholes for development to occur

Response

Alternative 2 maintains secure habitat at or above the 1998 level. There is some discretion as to where secure habitat occurs, but little discretion on how much, because secure habitat cannot drop below 1998 levels in any BMU subunit. Development would be limited inside the PCA as developed sites cannot increase over 1998 levels and secure habitat cannot drop below 1998 levels. For secure habitat, temporary changes in secure habitat can occur but cannot exceed 1 percent of the acreage of the largest subunit within that BMU.

Implementation—environmental and wildlife considerations

117. The Forest Service should implement Alternative 2.

- Because more space for the grizzlies can be problematic
- Because recovery targets have been met
- Because the genetic viability of grizzly bears can be maintained
- Because the designated Primary Conservation Area adequately represents the historic grizzly bear range
- Because the snow vehicles aid the environment
- Because the number of females with cubs of the year were more than double target in 2002

118. The Forest Service should not implement Alternative 2.

- Because it would allow for loss of wildlands
- To protect wildlife habitat
- Because it is inadequate for grizzly bear recovery
- Because it does not adequately protect grizzly habitat
- Because it restricts the grizzly population
- Because it does not consider global warming and its effects on the grizzly
- Because it does not include enough habitat in the Primary Conservation Area
- Because it cuts off Greater Yellowstone grizzlies from other habitats
- Because it increases the likelihood of inbreeding
- Because it does not protect wildlife highway crossings
- Because road decommissioning is the principal consideration in grizzly conservation

Response

Concerns about problems associated with more space for grizzly bears are discussed in detail in the FEIS (section 3.13). There will be continued emphasis on working with the states to identify areas that are socially acceptable for grizzly bears outside the PCA.

The status of the grizzly bear population in relation to recovery targets, including females with cubs-of-the-year, is displayed in section 3.3.3 of the FEIS. Currently, the number of females with cubs-of-the-year is more than twice the number specified in the Recovery Plan. The Recovery Plan and the Conservation Strategy identify the population and habitat requirements to meet and sustain a recovered grizzly bear population. The grizzly bear population is currently meeting the requirements for a recovered population. The purpose of this FEIS is to incorporate the habitat

management direction from the Conservation Strategy into forest plans to sustain the recovered grizzly bear population. State grizzly bear management plans, which are part of the Conservation Strategy, state that grizzly bears would be managed in areas that are biologically suitable and socially acceptable outside of the PCA. The Alternative 4 area outside the PCA is very similar to the area identified in the Wyoming Grizzly Bear Management Plan as being the biologically suitable and socially acceptable area for management of grizzly bear populations in Wyoming. For Idaho and Montana, the Conservation Strategy identifies the larger areas where biologically suitable and socially acceptable determinations will be made. Further refinements would likely take place on a case-by-case basis as these areas are occupied by grizzly bears. The Forest Service would work with the states as these areas are identified.

Concerns about genetic viability and associated issues of habitat connectivity and linkage zones are presented in section 3.3.1 in the FEIS. The Conservation Strategy recommends translocation of two or more bears from other ecosystems by 2022 if genetic analysis shows no movement into the GYA from the NCDE. The Conservation Strategy also recognizes that roads and highways may impact bear movements, and requires that monitoring and surveys be conducted before road and highway designs are initiated.

The PCA does not represent the historic grizzly bear range, but represents the recovery zone defined in the Recovery Plan. The recovery zone and Recovery Plan are discussed in section 1.1 of the FEIS.

Concerns about snow vehicles and grizzly bears are discussed in section 3.3.2 of the FEIS. In consultation with the USFWS, it was concluded that the level of take of grizzly bears that has and would result from snow machine use is low, based on the best available recent and long-term Yellowstone grizzly bear population information, the amount of protected and unprotected denning habitat available in the Yellowstone ecosystem, the location and characteristics of most grizzly bear den sites, the expert opinions of grizzly bear researchers in the Yellowstone ecosystem, and the best available information on grizzly bear denning.

The protection of all wildlands (also referred to as roadless areas by some respondents) and wildlife habitat on the GYA forests is not the purpose and need of this FEIS. The purpose and need of this FEIS is stated in section 1.2, which is to provide for the conservation of grizzly bear habitat to sustain the recovered Yellowstone grizzly bear population.

The effects sections in the FEIS (sections 3.3 and 3.16) contain more discussion on the potential impact to grizzly bears due to changes in the availability of grizzly bear food sources from global warming and other factors. It is recognized that global warming may affect the future availability of key foods for grizzly bears. Alternative 2-Modified includes direction for maintaining the productivity of the four key grizzly bear foods to the extent feasible and includes guidance to monitor the occurrence, health, and productivity of whitebark pine inside and outside the PCA. The Conservation Strategy also identifies required monitoring for the four key grizzly bear foods. The IGBST would prepare its Annual Report and evaluate the need for a Biology and Monitoring Review based on deviations in population and habitat standards and monitoring results. One outcome of the Biology and Monitoring Review could be a recommendation for changes in management due to changed conditions in the ecosystem.

Road decommissioning is a principal consideration in providing secure habitat for grizzly conservation, because secure habitat is defined as areas more than 500 meters from an open or gated motorized access route. Secure habitat is defined and discussed in detail in section 3.3 of the FEIS.

In response to these and other comments, a new preferred alternative was developed (Alternative 2-Modified). Alternative 2-Modified is described in chapter 2, and the effects of Alternative 2-Modified are displayed in chapter 3. Alternative 2-Modified maintains the habitat conditions that resulted in a recovered grizzly bear population within the PCA and provides additional habitat management guidance for areas outside the PCA that are identified as biologically suitable and

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socially acceptable by the states. A recovered grizzly bear population is defined in the Recovery Plan and the Conservation Strategy. The habitat conditions for the grizzly bear population are defined in the Conservation Strategy.

Implementation—recreational considerations

119. The Forest Service should implement Alternative 2.

- Because it allows for increased forest use
- Because progress can occur with snowmobile use

Response

While Alternative 2 is acceptable to many recreation users and some local communities, Alternative 2-Modified was developed to respond to other public and agency concerns about the need to provide for grizzly bears as the population expands outside the PCA. (Alternative 2 direction applies only within the PCA.) Alternative 2-Modified was developed between the draft and final EIS to further explore accommodations of expanding grizzly populations and assurances of continued recovery. The reliance on state and federal monitoring of grizzly populations will be key to understanding grizzly bear movements and uses of National Forest System lands.

Alternatives 2 and 2-Modified include a guideline that proposes local area restrictions where winter use activities conflict with denning or bear emergence in the spring (FEIS section 2.1.2). Research has not demonstrated that winter use activities have a negative effect on grizzly bears. (There have been no documented conflicts with snow machine use in 30 years of research.) The closing of snow machine routes in denning habitat as in Alternatives 3 and 4 are not incorporated in Alternative 2-Modified. In 2002, the Forest Service completed consultation with the USFWS on the effects of snow machine activities on grizzly bears. The USFWS stated that the best information suggests that current levels of snow machine use are not appreciably reducing the likelihood of either the survival or recovery of grizzly bears in the Yellowstone PCA and are not likely to jeopardize the continued existence of the grizzly bear (USDI FWS 2002). As required in the 2002 Biological Opinion from the USFWS, the GYA national forests are monitoring winter recreation use as required in the Greater Yellowstone Coordinating Committee Winter Use Monitoring Plan, and are working with the IGBST and the USFWS to assess any effects of winter uses on grizzly bears.

Implementation—social considerations

120. The Forest Service should implement Alternative 2.

- Because growing numbers of grizzlies may threaten humans
- Because the other alternatives may incite negative backlash against grizzlies
- Because local populations are projected to grow and management flexibility is needed to accommodate this increase

121. The Forest Service should implement Alternative 2 but also try to incorporate ways to reduce conflict outside the Primary Conservation Area.

Response

Alternative 2-Modified was developed between the draft and final EIS to consider accommodating grizzly populations outside the PCA and ensure continued recovery (including minimizing conflicts). The reliance on IGBST monitoring of grizzly populations will be key to understanding grizzly bear movements and uses of National Forest System lands. Alternative 2-Modified proposes direction that is based upon the states' definitions of socially acceptable and biologically suitable lands for the grizzly bear. Designation of socially acceptable lands for grizzlies depends upon public dialogue and focuses on specific lands that grizzlies are occupying. (Occupation would be defined by the states and in coordination with YGCC.) (FEIS section 2.1.3.)

Implementation—economic considerations

122. The Forest Service should implement Alternative 2.

- Because it has the least negative effects on local economies

Response

See response to comment 106.

Inadequacies of Alternative 2

Inadequacies—planning considerations

123. The Forest Service should address the inadequacies of Alternative 2.

- Because it fails to address the problems in the Conservation Strategy
- Because it is flawed in its application of habitat standards within the Primary Conservation Area
- Because it includes plans which contain time lags, gives too much political control, and lacks sound science
- Because it does not maintain habitat effectiveness in management units

Response

Alternatives 2 and 2-Modified reflect the direction of the Conservation Strategy. Through implementing the Recovery Plan and the Guidelines, the grizzly bear has recovered. The Conservation Strategy is designed to sustain the recovered population. The Conservation Strategy was developed through a cooperative effort with biologists and scientists from the USFWS, U.S. Geological Survey, Forest Service, BLM, and the Idaho, Montana, and Wyoming state wildlife management agencies. All relevant peer-reviewed information was considered in the development of the Conservation Strategy. The Yellowstone grizzly bear population and its habitat have been the focus of research and monitoring by the IGBST for 30 years. The IGBST was a key player in the development of the Conservation Strategy; all information generated through this long-term research and monitoring effort was directly available in the development of the Conservation Strategy.

Alternative 2-Modified incorporates some additional direction and guidance for grizzly bear habitat management beyond that noted in the DEIS and the Conservation Strategy. Alternative 2-Modified includes additional direction and guidance for keeping human attractants unavailable to bears, maintaining important food sources, and resolving grizzly bear/livestock conflicts both inside and outside the PCA. Alternative 2-Modified is estimated to provide sufficient habitat to maintain the grizzly bear population at recovery levels as identified in both the Recovery Plan and the Conservation Strategy

Regarding concerns about “time lags, gives too much political control, and lacks sound science,” the Conservation Strategy would be updated by the management agencies every five years or as necessary, allowing public comment in the updating process. Chapter 6 of the Conservation Strategy discusses implementation and evaluation processes. The Conservation Strategy states that the evaluation of the effectiveness of grizzly bear conservation measures detailed in the Conservation Strategy will be an ongoing process shared by all the members of the YGCC.

Regarding concerns about maintaining habitat effectiveness in BMUs, the 1 percent rule requires that any secure habitat temporarily affected must be restored upon project completion, and secure habitat that is permanently affected must be replaced with secure habitat of equal quality and amount.

Inadequacies—legal, resource, management, and economic considerations

124. The Forest Service should address the inadequacies of Alternative 2.

- To comply with the Organic Act, the Multiple Use Sustained Yield Act, and the National Forest Management Act

125. The Forest Service should address the inadequacies of Alternative 2.

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- Because it does not protect against development

Response

All alternatives analyzed in detail comply with the Organic Act, the Multiple Use Sustained Yield Act, and the NFMA. Alternative 2 would allow a low level of temporary or mitigated development to occur inside the PCA in relation to secure habitat and developed sites; outside the PCA, current forest plan direction would be followed. Alternative 2-Modified was developed to provide some additional guidelines on grizzly bear habitat management outside the PCA. Precluding development on private lands is outside the scope of this decision.

Inadequacies—environmental and wildlife considerations

126. The Forest Service should address the inadequacies of Alternative 2.

- Because it fails to manage the grizzly bear sustainably
- Because it fails to adequately protect the grizzly and its habitat
- Because it may cause grizzly bear extinction
- Because it fails to address inbreeding
- Because it fails to address the risk of population decline
- Because it fails to address problems arising from loss of food sources
- Because it misrepresents grizzly bear population size
- Because it uses unrealistic grizzly bear population standards
- Because it overestimates allowable grizzly bear mortality limits
- Because it fails to address the need of habitat connectivity
- Because its genetic management strategies are inadequate
- Because the management response to food decline is inadequate
- Because it fails to provide provisions to mitigate harmful effects from changes to secure habitat

Response

Alternatives 2 and 2- Modified reflect the direction of the Conservation Strategy. Through implementing the Recovery Plan and the Guidelines, the grizzly bear has recovered. The Conservation Strategy is designed to sustain the recovered population. The Conservation Strategy was developed through a cooperative effort with biologists and scientists from the USFWS, U.S. Geological Survey, Forest Service, BLM, and the Idaho, Montana, and Wyoming state wildlife management agencies. All relevant peer-reviewed information was considered in the development of the Conservation Strategy. The Yellowstone grizzly bear population and its habitat have been the focus of research and monitoring by the IGBST for 30 years. The IGBST was a key player in the development of the Conservation Strategy; all information generated through this long-term research and monitoring effort was directly available in the development of the Conservation Strategy. See response to comments 45-46.

For the FEIS, a new alternative was developed (Alternative 2- Modified), which is the preferred alternative. Alternative 2-Modified incorporates some additional direction and guidance for grizzly bear habitat management beyond that noted in the DEIS and the Conservation Strategy. Alternative 2-Modified includes additional direction and guidance for keeping human attractants unavailable to bears, maintaining important food sources, and resolving grizzly bear/livestock conflicts both inside and outside the PCA. Alternative 2-Modified is estimated to provide sufficient habitat to maintain the grizzly bear population at recovery levels as identified in both the Recovery Plan and the Conservation Strategy

The current status of the grizzly bear population is presented in section 3.3.3 in the FEIS. Current research suggests the grizzly bear population is growing between 4 and 7 percent annually, and has increased its distribution in the GYA by almost 50 percent since the 1970s. Peer-reviewed scientific literature was used to present the population status in the FEIS. The information and

analysis in the FEIS incorporate the best available science to represent grizzly bear population size and estimates and allowable grizzly bear mortality limits.

Regarding concerns about mitigating harmful effects from changes to secure habitat, the Application Rules for secure habitat for Alternative 2- Modified require that any secure habitat temporarily affected must be restored upon project completion and the implementation of temporary projects cannot exceed three years. Secure habitat that is permanently affected must be replaced with secure habitat of equal quality and amount and the replacement habitat must be maintained for a minimum of 10 years.

Regarding concerns for the loss of food sources, Alternative 2-Modified has a guideline to maintain the productivity, to the extent feasible, of the four key grizzly bear food sources as identified in the Conservation Strategy. Emphasis will be on maintaining and restoring whitebark pine stands inside and outside the PCA. Alternative 2-Modified also requires systematic monitoring of whitebark pine occurrence, productivity, and health inside and outside the PCA in cooperation with other agencies. Monitoring results would be used with other monitoring information to adjust management as necessary.

The need for habitat connectivity was discussed in the FEIS in sections 1.7.2 and 3.3.1.

Concerns about genetic viability and associated issues of habitat connectivity and linkage zones are presented in section 3.3.1 of the FEIS. The Conservation Strategy recommends translocation of two or more bears from other ecosystems by 2022 if genetic analysis shows no movement into the GYA from the NCDE. The Conservation Strategy also recognizes that roads and highways may impact bear movements, and requires that monitoring and surveys be conducted before road and highway designs are initiated. See the discussion on secure habitat in the FEIS, section 3.3.1. See the response to comment 119.

Inadequacies—recreational considerations

127. The Forest Service should address the inadequacies of Alternative 2.

- Because it fails to address off-road vehicle use inside the Primary Conservation Area

Response

Alternatives 2 and 2-Modified reflect the direction of the Conservation Strategy. Through implementing the Recovery Plan and the Guidelines, the grizzly bear has recovered. The Conservation Strategy is designed to sustain the recovered population. Implementing the Conservation Strategy, which includes provisions for secure habitat, will sustain a recovered grizzly bear population. Secure habitat (areas more than 500 meters from an open or gated motorized access route or recurring helicopter flight line, greater than or equal to 10 acres in size, and closed to OHV use) is adequate for sustaining grizzly populations. (See the FEIS chapter 1 and section 3.3.4.)

Inadequacies—economic considerations

128. The Forest Service should address the inadequacies of Alternative 2.

- Because it constricts livestock industries to 1998 levels

Response

Alternatives 2 and 2-Modified would not allow any new active commercial livestock grazing allotments; only sheep numbers would be restricted to the 1998 levels. Cattle numbers could increase above 1998 levels if an evaluation determined no detrimental effects to grizzly bears. See response for comments 275-302.

Modifications to Alternative 2

Modifications—planning considerations

129. The Forest Service should modify Alternative 2.

- To specify how adaptive policies will be enacted if problems arise
- To include the same level of protections as in Standards 1 and 2 of Alternative 3

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- To eliminate the Plateau Bear Management Unit
- To improve coordination and consistency of forest plan direction
- To include provisions that facilitate state planning objectives after delisting
- To clarify the length of time temporary changes under Standard 1 may exist
- To clarify who has responsibility for whitebark pine cone production and winter-killed ungulate carcass searches
- Because it fails to continue allocation of funds to the Interagency Grizzly Bear Study Team for key food source study
- To change the wording on page 28, applications for permits to drill and operating plans from “would strive to meet” to “must meet”
- To change the wording of Standard 3 to read “monitor, evaluate, and determine the proper stocking level of livestock in the allotment”

Response

Alternative 2-Modified was created to include some additional direction and guidance for keeping human attractants unavailable to bears, maintaining important food sources, and resolving grizzly bear/livestock conflicts both inside and outside the PCA. Alternative 2- Modified does require monitoring changes in secure habitat outside the PCA. Monitoring of secure habitat outside the PCA, along with all other required habitat and population monitoring results, would be used to evaluate annually the status of the grizzly bear population and make necessary modifications in management as required by the Conservation Strategy. The Conservation Strategy states, “The agencies are committed to be responsive to the needs of the grizzly bear by dynamic management actions based on the results of detailed annual population and habitat monitoring” (page 15).

Alternative 2- Modified is estimated to provide sufficient habitat to maintain the grizzly population at or above the goal of 500 bears as stated in the Conservation Strategy. The area estimated to be biologically suitable for grizzly bears on National Forest System lands outside the PCA contains more secure habitat than the PCA, with over three million acres of long-term secure habitat and over one million acres of short-term secure habitat. This is over four times the amount of long-term and doubles the amount of short-term secure habitat that was within the area occupied by grizzly bears outside the PCA from 1990 to 2004 when numbers were estimated at 500 to 600 bears.

The Conservation Strategy discusses adaptive management steps to address problems, should they arise. The Conservation Strategy would be updated by the management agencies every five years or as necessary, allowing public comment in the updating process. Chapter 6 of the Conservation Strategy discusses how it would be implemented and evaluated.

Alternative 2- Modified does not incorporate the same level of protections as in Standards 1 and 2 of Alternatives 3 and 4, because the bear reached recovery without this level of protection. The rationale for the selected alternative will be stated in the Record of Decision.

The Plateau BMU was not eliminated because evaluations completed in 1993 and 1994 determined that this BMU should be kept in the recovery zone. This is discussed in section 2.2.2 in the FEIS.

Improving coordination and consistency of forest plan direction among the six GYA national forests is part of the purpose and need of this FEIS, as stated in section 1.2.

The state grizzly bear management plans identify managing for grizzly bears outside the PCA in areas that are biologically suitable and socially acceptable. The Alternative 4 area outside the PCA is very similar to the area identified in the Wyoming Grizzly Bear Management Plan as being the biologically suitable and socially acceptable area for management of grizzly bear populations in Wyoming. For Idaho and Montana, the Conservation Strategy identifies the larger areas where biologically suitable and socially acceptable determinations would be made. Further refinements would likely take place on a case-by-case basis as these areas are occupied by

grizzly bears. The Forest Service would work with the states as these areas are identified. Alternative 2-Modified contains a livestock grazing guideline, a food storage guideline, a food sources guideline, a monitoring item for secure habitat, and a monitoring item for whitebark pine that would apply to areas outside the PCA that have been or would be identified as biologically suitable and socially acceptable.

To clarify the length of time temporary changes to secure habitat may exist under Standard 1, wording was added to the Application Rules that states that these activities should be concentrated in time and space to the extent feasible to minimize disturbance. Additionally, to qualify as a temporary project under the Application Rules, project implementation could last no longer than three years.

Regarding the responsibility for whitebark pine cone production and winter-killed ungulate carcass searches, the Conservation Strategy identifies that these are interagency tasks involving the IGBST, the NPS, the state wildlife management agencies, and the Forest Service.

Regarding the allocation of funds to the IGBST for a key food source study, this is outside the scope of the FEIS.

Regarding changing the wording in the DEIS on existing oil and gas leases (page 28) from “would strive to meet” to “must meet,” the Forest Service is obligated to honor those existing statutory rights. Section 2.2.3 in the FEIS discusses these obligations. It may not be physically possible to meet the Application Rules in all cases, but it is the intent of the Forest Service to strive to meet the Application Rules.

Regarding the recommendation to change Standard 3 to read, “monitor, evaluate, and determine the proper stocking level of livestock in the allotment,” this recommendation is outside the scope of the purpose and need of this FEIS. The Forest Service follows established procedures to monitor, evaluate, and determine the proper stocking level of livestock on allotments. A forest plan amendment is not needed to direct this work. A discussion on the cumulative effects of livestock grazing on grizzly bears has been included in section 3.16.3 of the FEIS.

Modifications—balanced management considerations

130. The Forest Service should modify Alternative 2.

- To delete special land designations that affect multiple use management mandates

Response

The decision to change land designations is not part of the decision to be made.

Modifications—resource management considerations

131. The Forest Service should modify Alternative 2.

- To revise the concept of “willing permittees” to be less deceptive
- To forbid mining and mineral leasing in occupied habitat
- To add timber harvest activities to the definition of acceptable activities in secure habitat in chapter 2
- To eliminate the 1 percent provision that would allow excessive development of grizzly habitat inside the Primary Conservation Area
- To give permittees certainty their permits will be renewed pursuant to the Conservation Strategy
- To account for enhanced livestock grazing
- To include the closure of livestock allotments where conflicts occur
- To allow for levels of livestock above the 1998 levels on forest lands
- To favor the grizzly in livestock and grizzly conflicts
- To work with permittees of grazing allotments in finding other available allotments before allotments are eliminated

Responses to Comments

- To remove language that closes grazing allotments due to grizzly conflicts without National Environmental Policy Act analysis
- To include monitoring and reporting requirements for conflicts between large carnivores and livestock on grazing allotments and specify what actions will occur if mortality limits are exceeded

Response

Alternative 2-Modified was created in response to public comments. Mineral leasing and the secure habitat Application Rule, which allows temporary reductions in secure habitat, did not change.

In Alternative 2- Modified, a guideline was added that allows cattle allotments or portions of cattle allotments with recurring conflicts that cannot be resolved through modification of grazing practices to be retired as opportunities arise with willing permittees. Language similar to this was in the Application Rule for Alternative 2 and was stated as a guideline in Alternative 2-Modified. An Application Rule was added that gives permittees with allotments with recurring conflicts the opportunity for placement in a vacant allotment outside the PCA where there is less likelihood for conflicts with grizzly bears as these allotments become available. The Application Rule that stated, “The cattle allotment with the history of chronic conflicts may be closed to grazing without further NEPA analysis” was not included in Alternative 2-Modified in response to concerns raised by the public. Sections 2.1.2 and 2.1.3 of the FEIS contain descriptions of the standards, guidelines, and application rules for Alternatives 2 and 2-Modified related to livestock grazing.

A monitoring item was added in Alternative 2-Modified that requires the Forest Service to monitor and evaluate allotments for recurring conflicts with grizzly bears inside and outside the PCA. Monitoring of allotments with recurring conflicts would be used along with all other required habitat and population monitoring results to annually evaluate the status of the grizzly bear population and make necessary modifications in management as required by the Conservation Strategy. The Conservation Strategy states, “The agencies are committed to be responsive to the needs of the grizzly bear by dynamic management actions based on the results of detailed annual population and habitat monitoring” (page 15).

Efforts have been underway for a number of years to refine and improve methods for determining a total population estimate, unknown and unreported estimates of mortality, and total allowable mortality for grizzly bears in the GYA. This effort has resulted in new methods for determining sustainable mortality limits developed by the IGBST and approved by the YES that will be incorporated into the Conservation Strategy. The protocol states that if mortality limits are exceeded in any two or three consecutive years (depending on the sex or age class of bears), a Biology and Monitoring Review will be initiated by the IGBST. Again, this information would be evaluated in context with all the other required monitoring parameters and appropriate management changes made as necessary. The Forest Service is represented on the IGBST and the YGCC that would approve any necessary changes in management direction.

Modifications—environmental and wildlife considerations

132. The Forest Service should modify Alternative 2.

- To ensure that grizzlies in Yellowstone can survive
- Because it fails to maintain roadless areas
- To secure adequate habitat for the grizzly
- To enlarge protected habitat area
- To allow additional habitat areas to be added to the Primary Conservation Area “as needed” in the future
- To maintain existing roadless areas
- To prevent habitat fragmentation

- To clarify that the grizzly will continue to be designated as a “Forest Service sensitive species”

Response

Alternative 2-Modified includes some additional direction and guidance for keeping human attractants unavailable to bears, maintaining important food sources, and resolving grizzly bear/livestock conflicts both inside and outside the PCA. Roadless areas will be managed according to forest plan direction and the 2005 Final Rule (USDA Forest Service 2005f). There is no specific direction for secure habitat outside the PCA under Alternative 2-Modified.

Approximately 72 percent of the almost six million-acre area estimated to be biologically suitable for grizzly bears outside the PCA on National Forest System lands is secure habitat. Seventy-one percent of that secure habitat is long-term secure habitat that will be maintained under current forest plan direction (FEIS section 3.3.1). Alternative 2-Modified does require monitoring of changes in secure habitat outside the PCA. Monitoring of secure habitat outside the PCA would be used along with all other required habitat and population monitoring results to annually evaluate the status of the grizzly bear population and make necessary modifications in management as required by the Conservation Strategy. The Conservation Strategy states, “The agencies are committed to be responsive to the needs of the grizzly bear by dynamic management actions based on the results of detailed annual population and habitat monitoring” (page 15).

Alternative 2-Modified is estimated to provide sufficient habitat to maintain the grizzly population at or above the goal of 500 bears as stated in the Conservation Strategy. The area estimated to be biologically suitable for grizzly bears on National Forest System lands outside the PCA contains more secure habitat than the PCA, with over three million acres of long-term secure habitat and over one million acres of short-term secure habitat. This is over four times the amount of long-term and doubles the amount of short-term secure habitat that was within the area occupied by grizzly bears outside the PCA from 1990 to 2004 when numbers were estimated at 500 to 600 bears. This secure habitat will be managed under existing forest plan direction (FEIS section 3.2).

Upon delisting, grizzly bears would be designated a Forest Service sensitive species, requiring a biological evaluation for all activities in or out of secure habitat. This designation requires that land management activities be managed to maintain a sustainable grizzly bear population and avoid listing under the ESA (FEIS section 2.2) Secure habitat would be a consideration in these evaluations.

Concerns regarding habitat fragmentation inside the PCA are generally addressed with the secure habitat standard. The 1 percent rule requires that any secure habitat temporarily affected must be restored upon project completion. There is some potential for habitat fragmentation outside the PCA; secure habitat has increased on all six GYA national forests over the last 17 years due to downward trends in timber harvest and a decrease in miles of roads (FEIS section 3.3).

Modifications—recreational considerations

133. The Forest Service should modify Alternative 2.

- To consider the impacts of motorized winter activities on hibernating grizzly bears
- To include provisions that remove existing motorized routes in inventoried roadless areas
- To consider the conflict that may occur with snowmobile users and timber management and work with local grooming programs to reduce disruption

Response

Alternatives 2 and 2-Modified include a guideline that proposes local area restrictions where winter use activities conflict with denning or bear emergence in the spring (FEIS section 2.1.2). Research has not demonstrated that winter use activities have a negative effect on grizzly bears. (There have been no documented conflicts with snow machine use in 30 years of research.) The

closing of snow machine routes in denning habitat as in Alternatives 3 and 4 are not incorporated in Alternatives 2 or 2-Modified. In 2002, the Forest Service completed consultation with the USFWS on the effects of snow machine activities on grizzly bears. The USFWS issued a Biological Opinion stating that current authorized snow machine activity is not likely to jeopardize the continued existence of the grizzly bear (USDI FWS 2002). The USFWS stated that the best information suggests that current levels of snow machine use are not appreciably reducing the likelihood of either the survival or recovery of grizzly bears in the PCA. The USFWS did not anticipate a high level of incidental take and stated that incidental take was unquantifiable. The USFWS concluded the level of take of grizzly bears that has and would result from snow machine use is low, based on the best available recent and long-term Yellowstone grizzly bear population information, the amount of protected and unprotected denning habitat available in the Yellowstone ecosystem, the location and characteristics of most grizzly bear den sites, the expert opinions of grizzly bear researchers in the Yellowstone ecosystem, and the best available information on grizzly bear denning. As required in the 2002 Biological Opinion from the USFWS, the GYA national forests are monitoring winter recreation use as required in the GYCC Winter Use Monitoring Plan, and are working with the IGBST and the USFWS to assess any effects of winter uses on grizzly bears.

Alternative 2 reflects the direction of the 1982 and 1993 Recovery Plans and the Conservation Strategy. Through implementing the Recovery Plans and the Conservation Strategy, which include provisions for secure habitat, the grizzly bear population has recovered. Secure habitat (areas more than 500 meters from an open or gated motorized access route or recurring helicopter flight line, greater than or equal to 10 acres in size, and closed to OHV use) is adequate for sustaining grizzly populations (FEIS chapter 1 and section 3.3.4).

In reference to potential conflicts between winter logging and winter recreation activities, potential conflicts would be addressed through management at the ranger district level, monitoring of winter use, or site-specific NEPA analyses and project decisions that follow forest plan direction (FEIS section 1.4).

Modifications—social considerations

134. The Forest Service should modify Alternative 2.

- To include food storage requirements
- To include additional restrictions to resolve conflict between grizzlies and humans and protect food sources

Response

Alternative 2-Modified includes direction and guidance for minimizing grizzly bear/human conflicts using food storage requirements and information and education both inside and outside the PCA. Guidance was included for maintaining the productivity of key grizzly bear foods and for resolving conflicts with livestock inside and outside the PCA (FEIS section 2.1.3)

Alternative 3

135. The Forest Service should implement Alternative 3.

- Because it secures necessary grizzly habitat
- Because it is the most comprehensive balance for environment safety
- Because it maintains development at 1998 levels
- Because it prohibits oil and gas development in the Primary Conservation Area

136. The Forest Service should not implement Alternative 3.

- Because it would implement restrictive standards inside the Primary Conservation Area
- Because there is no proof that allotments are detrimental to grizzly recovery
- Because it would not promote multiple use principles

137. The Forest Service should implement Alternative 3 with elements of Alternative 4.

Response

Although Alternative 3 may provide some additional protections to grizzly bear habitat inside the PCA over Alternatives 2 and 2-Modified, other forest uses are restricted. Alternative 2-Modified was developed to provide protection of habitat sufficient to sustain a recovered grizzly bear population and allow for other uses inside the PCA at 1998 levels. Secure habitat would be maintained in Alternative 2-Modified outside the PCA in excess of that being used by grizzly bears from 1990 to 2004, when grizzly bear numbers were estimated at 500 to 600 bears under current forest plan direction (FEIS sections 3.3 and 3.3.1). Oil and gas development inside the PCA would be limited due to the mitigation required in the developed site and secure habitat standards. There are no active oil and gas leases inside the PCA (FEIS section 3.12.2).

Provisions have been identified in Alternative 2-Modified for livestock allotments with recurring conflicts that can be phased out with willing permittees if conflicts cannot be resolved. Livestock depredation was the second highest source of grizzly bear conflicts from 1992 to 2004; about 10 percent of the documented human-caused grizzly bear mortalities from 1975 to present were a result of conflicts with livestock (FEIS section 3.3.2)

Inside the PCA, Alternatives 3 and 4 provide the same level of protection to the grizzly bear. Alternative 4 extends these protections outside the PCA. The Record of Decision will identify the selected alternative and will discuss the rationale for that decision.

Alternative 4**Implementation of Alternative 4***Implementation—general considerations*

138. The Forest Service should implement Alternative 4.

- Because of its purpose and simplicity
- Because there are too many changing conditions

139. The Forest Service should not implement Alternative 4.

- Because its approach to grizzly management is extreme

140. The Forest Service should implement Alternative 4.

- Because the Draft EIS data support it
- Because it addresses the mission statement of the Fish and Wildlife Service and the National Park Service
- Because it supports the Yellowstone to Yukon initiative
- Because the proposed alternative is based on outdated information
- Because grizzlies do not recognize boundaries

141. The Forest Service should not implement Alternative 4.

- Because it is outside the bounds of the Recovery Plan
- Because it violates the understanding of the Conservation Strategy by the states

142. The Forest Service should implement Alternative 4.

- To fulfill the spirit of the Wilderness Act of 1964
- To uphold the intent and spirit of the Endangered Species Act

143. The Forest Service should not implement Alternative 4.

- Because economic hardships could lead to class action against the federal government

144. The Forest Service should implement Alternative 4.

- Because the Forest Service cannot be trusted

145. The Forest Service should implement Alternative 4.

- Because it is the environmentally preferred alternative

Responses to Comments

146. The Forest Service should not implement Alternative 4.

- Because local communities oppose it
- Because it would stir up public opinion against grizzly management

147. The Forest Service should implement Alternative 4.

- Because it supports human uses and grizzly protection
- Because sacrifices for grizzly survival are more important than limiting human use
- Because it offers a reasonable balance of business and property interests

148. The Forest Service should not implement Alternative 4.

- Because it would restrict our ability to develop domestic sources of energy

149. The Forest Service should implement Alternative 4.

- To ensure that timber management considers the needs of the grizzly
- To protect grizzly habitat from development
- To protect grizzly habitat from road construction
- Because of threats from a growing human population
- Because it closes livestock allotments

150. The Forest Service should implement Alternative 4.

- To preserve the ecosystem
- Because Yellowstone is unique
- For the benefit of all wildlife
- To protect grizzly habitat
- To prevent habitat fragmentation
- Because the grizzly bear has ecological value
- To include more area in the Primary Conservation Area
- Because scientists have shown the importance of grizzly habitat
- To protect fragile grizzly population numbers
- Because extinction may otherwise become a problem
- To reduce grizzly bear mortality
- Because grizzly food sources are threatened
- Because it reduces the risk of inbreeding
- To prevent an increase of roads in grizzly habitat
- Because biologists have deemed the grizzly population density artificially high
- Because it will permanently maintain secure habitat
- Because it maintains food sources to keep grizzly presence in the area

151. The Forest Service should not implement Alternative 4.

- Because there is no need to extend the Primary Conservation Area

Response

Alternative 4 was developed in response to comments suggesting the Forest Service extend grizzly bear habitat protection beyond the PCA. The purpose is to address the potential future loss of major bear foods, increase the probability of habitat connectivity with other ecosystems, improve linkage and connectivity between key habitats within the six GYA national forests, and further reduce the potential for grizzly bear/human conflicts and bear mortality throughout the GYA. This alternative increases the size of the area where management direction would favor grizzly bears and would implement more restrictive standards than what is described in the Conservation Strategy. Alternative 4, the boundary outside the PCA, and the standards and guidelines were developed using information obtained from scoping. Existing evaluations of suitable habitat and linkage areas for grizzly bears within the six GYA national forests were used as the basis for delineation of this boundary.

The analysis of the environmental effects of this alternative, as compared with other alternatives, sharply defines the differences between each alternative and provides a clear basis for choice among options by the decision makers and the public. Alternative 4 would provide protection and enhancement for important grizzly bear habitat, increasing connectivity options between important habitats inside the GYA and possibly increasing the potential for connectivity to other ecosystems. Should the long-term availability of important foods be reduced, the carrying capacity of the GYA for grizzly bears would decline. The additional secure habitat under Alternative 4 might allow the GYA to support bears throughout a larger area than the other alternatives. On the other hand, Alternative 4 would have the largest cumulative effects on the social and economic environment due to the reductions in income and employment associated with livestock grazing, timber harvesting, and mineral development. As discussed in the social environment, larger scale changes in land management such as the closure of 1,850 miles of motorized routes in Alternative 4 would have significant impacts upon rural communities and motorized users. These changes can stress the public's tolerance for accommodating grizzly bear expansion and occupation. Alternative 4 imposes strict restrictions on land uses outside the Primary Conservation Area where there is no way to predict when or if bears would occupy those areas. These kinds of restrictions are seen as unreasonable by some local communities and make it more difficult to gain support and compliance. Similarly, management of grizzly bears under the ESA generates a similar perception of "locking up public lands."

Alternative 4 would provide additional protections to grizzly bear habitat inside and outside the PCA as compared to other alternatives, but other forest uses would be significantly restricted. These restrictions include eliminating all over-the-snow use during denning periods, no new oil and gas leases, elimination of developed or dispersed sites with recurring grizzly bear conflicts, limiting use of backcountry trails in high use areas for grizzly bears, and area closures in important grizzly bear food areas. Alternative 2- Modified was developed to include some additional guidance and direction for keeping human attractants unavailable to bears, maintaining important food sources, and resolving grizzly bear/livestock conflicts both inside and outside the PCA while minimizing impacts to other forest uses. Alternatives 1, 2, and 3 do not provide this level of protection to areas outside the PCA.

Secure habitat would be maintained in Alternative 2-Modified outside the PCA in excess of that being used by grizzly bears from 1990 through 2004, when grizzly bear numbers were estimated at 500 to 600 bears under current forest plan direction (FEIS chapter 3).

Concerns regarding habitat fragmentation inside the PCA are generally addressed with the secure habitat standard. The 1 percent rule requires that any secure habitat temporarily affected must be restored upon project completion. There is some potential for habitat fragmentation outside the PCA; secure habitat has increased on all six GYA national forests over the last 17 years due to downward trends in timber harvest and a decrease in miles of roads (FEIS section 3.1).

Regarding concerns about mitigating harmful effects from changes to secure habitat, the Application Rules for secure habitat require that any secure habitat temporarily affected must be restored upon project completion and the implementation of temporary projects cannot exceed three years. Secure habitat that is permanently affected must be replaced with secure habitat of equal quality and amount and the replacement habitat must be maintained for a minimum of 10 years.

Regarding concerns for the loss of food sources, Alternative 2-Modified has a guideline to maintain the productivity, to the extent feasible, of the four key grizzly bear food sources as identified in the Conservation Strategy. Emphasis would be on maintaining and restoring whitebark pine stands inside and outside the PCA. Alternative 2-Modified also requires systematic monitoring of whitebark pine occurrence, productivity, and health inside and outside the PCA in cooperation with other agencies.

The need for habitat connectivity was discussed in the FEIS in sections 1.7.2 and 3.3.1

Responses to Comments

Concerns about genetic viability and associated issues of habitat connectivity and linkage zones are presented in sections 3.3.1 and 3.16 of the FEIS. The Conservation Strategy recommends translocation of two or more bears from other ecosystems by 2022 if genetic analysis shows no movement into the GYA from the NCDE. The Conservation Strategy also recognizes that roads and highways may impact bear movements, and requires that monitoring and surveys be conducted before road and highway designs are initiated.

Implementation—forest health considerations

152. The Forest Service should not implement Alternative 4.

- Because it would lead to wildfire risks

Response

Alternative 4 would have the greatest effect on wildland fire management activities in those units that would close roads to meet the secure habitat standard. The estimated number of roads closed to meet this standard in Alternative 4 is about 1,850 miles. The closure of these roads could lead to longer response times and larger fires across the GYA based on current fire management capabilities. Access for firefighters can still be accomplished via helicopters and airplanes (smokejumpers) or on foot. Currently, every wildland fire is evaluated for potential impacts and managed appropriately.

Implementation—recreational considerations

153. The Forest Service should implement Alternative 4.

- To restrict motorized access
- Because it prevents hunting
- Because snowmobiling may have an effect on grizzly bear denning

154. The Forest Service should not implement Alternative 4.

- Because it would reduce public use and enjoyment of local lands
- Because it does not provide for developed campsites

Response

Many recreation users and some local communities expressed concerns with the restrictions in Alternatives 3 and 4 and the potential impact on recreation through limitations of access and possible restrictions on motorized uses.

While Alternative 2 is acceptable to many recreation users and some local communities, Alternative 2-Modified was developed to respond to other public and agency concerns about the need to provide for grizzly bears as the population expands outside the PCA. (Alternative 2 direction only applies within the PCA.) Alternative 2-Modified was developed between the draft and final EIS to further accommodate expanding grizzly populations and ensure continued recovery. The reliance on the states and the IGBST to monitor grizzly populations would be key to understanding grizzly bear movements and uses of National Forest System lands. Alternatives 3 and 4 offer greater restrictions to motorized travel; Alternative 2-Modified addresses food storage, bear food sources, and security for the bear outside the PCA (FEIS section 2.1.3).

A continued dialogue with the public, including recreation users, will be essential as grizzlies occupy lands outside the PCA. Alternative 2-Modified proposes guidance outside the PCA that is based upon the states' definitions of socially acceptable and biologically suitable lands for the grizzly bear. Designation of socially acceptable lands for grizzlies depends upon a dialogue with the public and focuses on specific lands that grizzlies are occupying. (Occupation would be defined by the states in cooperation with YGCC.) As noted in the FEIS, the recreation uses of hunting, fishing, and backcountry use (including horse travel) are key values by local communities; these uses are regional attractions and are increasing (FEIS sections 3.9 and 3.13).

Alternatives 2 and 2-Modified include a guideline that proposes local area restrictions where winter use activities conflict with denning or bear emergence in the spring (FEIS section 2.1.2). Research has not demonstrated that winter use activities have a negative effect on grizzly bears.

(There have been no documented conflicts with snow machine use in 30 years of research.) The closing of snow machine routes in denning habitat as in Alternatives 3 and 4 are not incorporated in Alternatives 2 or 2-Modified. In 2002, the Forest Service completed consultation with the USFWS on the effects of snow machine activities on grizzly bears. The USFWS issued a Biological Opinion stating that current authorized snow machine activity is not likely to jeopardize the continued existence of the grizzly bear (USDI FWS 2002). The USFWS stated that the best information suggests that current levels of snow machine use are not appreciably reducing the likelihood of either the survival or recovery of grizzly bears in the PCA. The USFWS did not anticipate a high level of incidental take, and stated that incidental take was unquantifiable. The USFWS concluded that the level of take of grizzly bears that has and would result from snow machine use is low, based on the best available recent and long-term Yellowstone grizzly bear population information, the amount of protected and unprotected denning habitat available in the Yellowstone ecosystem, the location and characteristics of most grizzly bear den sites, the expert opinions of grizzly bear researchers in the Yellowstone ecosystem, and the best available information on grizzly bear denning. As required in the 2002 Biological Opinion from the USFWS, the GYA national forests are monitoring winter recreation use as required in the GYCC Winter Use Monitoring Plan, and are working with the IGBST and the USFWS to assess any effects of winter uses on grizzly bears.

Hunting of grizzly bears is a matter that would be managed by the states and their state management plans upon delisting of the grizzly bear. Alternatives 2, 2-Modified, 3, and 4 do not propose any direction with regard to grizzly bear hunting since it is outside the jurisdiction of the Forest Service. Alternative 4 would coordinate with states in closing black bear baiting where grizzly bear conflicts occur.

Implementation—social considerations

155. The Forest Service should implement Alternative 4.

- Because it preserves Wyoming's legacy of recreation
- Because the grizzly bear has inherent value
- Because grizzly bears are part of our heritage
- Because grizzlies have a value to individuals
- Because it will expand food storage requirements
- To prevent grizzly bear-human conflict
- Because the grizzly has scientific value
- Because grizzly bears contribute to our quality of life
- Because the grizzly bear has symbolic value
- To leave a legacy for future generations
- Because we are the stewards of the natural world
- Because a cultural transformation to focus on ecological restoration is needed

156. The Forest Service should not implement Alternative 4.

- Because it would increase grizzly population around local areas

Response

See response to comments 152 and 153.

Many recreation users and some local communities expressed concerns with the restrictions in Alternatives 3 and 4 and the potential impact on recreation through limitations of access and possible restrictions on motorized uses.

The Forest Service is committed to sustaining a recovered grizzly bear population in the GYA. This commitment is shared and managed with other agencies and organizations (FEIS chapter 1 and section 3.13.1). Alternative 2-Modified was developed to respond to public and agency concerns about the need to provide for grizzly bears as the population expands outside the PCA. Grizzly bear habitat needs and minimizing grizzly bear/human conflicts are addressed in the

Responses to Comments

FEIS in sections 2.1.3 and 3.3. The value that many people place on grizzly bears is also acknowledged in sections 3.13.

Public acceptance of grizzly bears is regarded as a key component in “the ultimate success in perpetuating the bear’s recovery, public safety, and ease to which agencies can effectively manage for the bear” (FEIS section 3.13.2). A continued dialogue with the public, including local communities and environmental organizations, would be essential as grizzlies occupy lands outside the PCA. Alternative 2-Modified includes direction outside the PCA based upon the states’ definitions of socially acceptable and biologically suitable lands for the grizzly bear. Designation of socially acceptable lands for grizzlies depends upon a dialogue with the public and focuses on specific lands that grizzlies are occupying. (Occupation would be defined by the states in cooperation with the YGCC.) (FEIS section 2.1.3)

Implementation—economic considerations

157. The Forest Service should implement Alternative 4.

- For economic benefits
- To secure local tourism business
- Because the needs of the public must be put before business interests
- Because the effects on industry would be minimal

158. The Forest Service should not implement Alternative 4.

- Because of the economic effects it would create

Response

Overall, Alternative 4 would have the most economic impact of any alternative, either through the loss of jobs and income associated with the reduction in current production of outputs, or through the jobs and income foregone by precluding oil and gas development. Anywhere from 38 to 204 jobs and from \$8.6 million to \$23.2 million in labor income would be reduced by reductions in the livestock grazing and timber harvesting programs. (FEIS section 3.14)

Modifications to Alternative 4

Modifications—planning considerations

159. The Forest Service should modify Alternative 4.

- Including provisions for effective means of enforcement
- Including provisions for monitoring of alternative food sources
- Including provisions for scientific monitoring protocols
- Including monitoring and response systems that will prevent lag time from allowing habitat or population changes
- To establish road management and density standards based on the best available science
- Because secure habitat and developed sites standards should not be based solely on 1998 and 2003 human activity levels

Response

Law enforcement activities are categorically exempt from NEPA analysis (Forest Service Handbook 1909.15, 31.11). Within the Forest Service organization, law enforcement is separated from all other management programs so that enforcement activities can operate free of influences from those programs.

Suggestions were made that the Forest Service should monitor alternative food sources. Food habits of grizzly bears are discussed in section 3.3.1 of the FEIS. Over 100 natural food items have been documented in food studies of the Yellowstone grizzly bear. The four seasonal foods that have been identified as being most important for Yellowstone grizzly bears have been identified for monitoring in the Conservation Strategy and the FEIS. It is not possible to monitor all of the alternative food sources that grizzly bears could use. At this time, no alternative food

sources have been identified for monitoring. Food sources vary throughout the GYA, and a particular alternative food source may be important in one part of the GYA but not in another.

The IGBST and professional biologists in the cooperating agencies have approved the monitoring protocols for the specified monitoring items. As technologies change and improve, the new technologies can be used for monitoring. For example, in Alternative 2-Modified, Monitoring Item 4 states that the CEM or the best available system would be used to monitor changes in habitat effectiveness. Similarly, new sustainable mortality limits that do a better job of monitoring all causes of grizzly bear mortality (rather than just human-caused mortality) have been developed and will be incorporated into the Conservation Strategy.

The Conservation Strategy contains monitoring and response systems to respond to habitat or population changes. The YGCC would meet twice each year to review habitat and population data. The Conservation Strategy would be updated by the management agencies every five years or as necessary, allowing public comment in the updating process. The FEIS, section 2.16, discusses how monitoring information would be used to make changes to management direction on National Forest System lands.

The Conservation Strategy was developed using the best available science and identified secure habitat as one of the most important habitat components for grizzly bears. Secure habitat is directly related to road management and density. All action alternatives contain a monitoring requirement for secure habitat and motorized access inside the PCA. Alternatives 2-Modified and 4 would also monitor secure habitat outside the PCA. Results of this monitoring would be submitted to the IGBST for inclusion in their annual reports.

Secure habitat and developed sites standards are based on 1998 and 2003 human activity levels because grizzly bear population and distribution increased with these activity levels. If, through monitoring, these activity levels are shown to be a problem, there is a monitoring and response system to make necessary changes to management direction on National Forest System lands.

Modifications—resource management considerations

160. The Forest Service should modify Alternative 4.

- To consider private land developments within the developed sites standards
- To phase out vacant livestock allotments where grizzly conflicts have occurred or are likely to occur in the future
- To phase out sheep allotments in Idaho and immediately close allotments in Wyoming and Montana
- For voluntary, rather than mandatory, closing of allotments
- To provide financial incentives for retiring livestock allotments and facilitate National Environmental Policy Act compliance of closures

Response

Management of private land developments is outside the scope of the FEIS because the Forest Service has no jurisdiction on private lands. Private lands inside and outside the PCA have not been managed directly for grizzly bears, although bears have occupied some areas and grizzly bear recovery has occurred. Bears may depend on private landowner accommodation of bear movements; tolerance and community support is important but not directed by this FEIS. A discussion of the effects of private land development on the grizzly bear is included in the FEIS (section 3.16). The Conservation Strategy recognizes that “federal land management and state wildlife management agencies have no direct management authority over private lands and do not have the ability to respond to all private land development by management actions on public lands. As private lands are developed and as secure habitat on private lands declines, state and federal agencies will work together to explore options that address impacts from private land development” (page 54). Monitoring protocols have been identified to monitor private land status and condition. The states have agreed to assist private non-profits and other entities to categorize and prioritize potential lands suitable for permanent conservation.

Responses to Comments

There was an error in the livestock standard for Alternative 4 in the DEIS, which has been corrected in the FEIS. The livestock standard for Alternative 4 in the FEIS prevents creation of new livestock allotments within the Alternative 4 area, closes sheep allotments within three years within the Alternative 4 area, and closes cattle allotments with recurring conflicts within the Alternative 4 area.

Voluntary closing of livestock allotments was not a consideration in Alternative 4, but is covered in some of the other alternatives.

Providing financial incentives for retiring livestock allotments is outside the purpose and need for this FEIS, and is outside the authority of the Forest Service. Appropriate NEPA analysis would be conducted when closing livestock allotments.

Modifications—environmental considerations

161. The Forest Service should modify Alternative 4.

- To elevate road standards
- To address connectivity and linkage zone problems
- To mandate that all inventoried roadless areas stay designated as such

162. The Forest Service should expand the land protected under Alternative 4.

- To include the Wyoming Range
- To include the Wyoming Range and southern Wind Rivers
- To include the Bridger Range, Hoback Peak, and the northern Salt River Range
- To include subunit Targhee 4
- To include part of the Teton Basin District of the Targhee Forest

Response

Alternative 4 emphasizes increasing secure habitat both inside and outside the PCA, which would require permanently closing a minimum of 1,850 miles of existing open roads. Regarding the comment on elevating road standards that would result in more miles of closed roads, it was determined to be unnecessary for Alternative 4 because secure habitat was more than adequate to sustain the recovered grizzly bear population.

Connectivity and linkage zone issues are discussed in the FEIS in section 1.7.2. The scope of the FEIS is limited to the six national forests within the GYA—the FEIS does not propose any changes to management direction on national forests outside the GYA. Connectivity and linkage zone issues include private lands, state lands, and other federal lands; management of private lands, state lands and other federal lands is outside the scope of this FEIS.

Alternative 4 emphasizes increasing secure habitat both inside and outside the PCA. Within the Alternative 4 area, inventoried roadless areas would be maintained in a roadless condition and existing motorized routes in inventoried roadless areas would be removed within five years. Outside of the Alternative 4 area, inventoried roadless areas would follow existing forest plan direction and direction in current roadless area rules.

The Forest Service did not expand the protected area under Alternative 4 for the following reasons: 1) the suggested areas for expansion in Wyoming, e.g., Salt River and Wyoming Ranges, etc. are not included in the Wyoming Game and Fish Department's grizzly bear management plan for grizzly bear occupancy, 2) these areas in Idaho have not been identified as socially acceptable at this time, 3) the large areas included in Alternative 4 were generally adequate to evaluate differences between alternatives, and 4) Alternative 4 was consistent with existing evaluations by independent researchers of biologically suitable habitat within the GYA and input from several conservation groups.

Modifications—recreational considerations

163. The Forest Service should modify Alternative 4.

- To prohibit black bear baiting

- To prohibit grizzly bear hunting
- To ban grizzly hunting and black bear baiting and enforce these measures

Response

State wildlife management agencies have the authority and responsibility to regulate black bear baiting, although Alternative 4 would require Forest Service coordination with states in closing black bear baiting where grizzly bear conflicts occur. Currently, black bear baiting is prohibited throughout the PCA. Black bear baiting is not allowed in the State of Montana; black bear baiting is allowed outside the PCA in Idaho. The State of Wyoming allows black bear baiting outside the PCA in some areas; some areas are closed to baiting and in other areas baits are restricted to non-processed foods to minimize grizzly bear conflicts. Grizzly bear hunting is identified as a future management tool in the Conservation Strategy. Hunting would be under the authority and responsibility of the state wildlife management agencies, not the Forest Service.

Modifications—economic considerations

164. The Forest Service should modify Alternative 4.

- To secure funding for grizzly management

Response

The budget to implement all alternatives, including Alternative 4, is discussed in section 3.14 in the FEIS. Alternative 4 would have higher costs than other alternatives for all monitoring items and for management of grizzly bear/human conflicts. The FEIS is not a mechanism to secure funding.

Alternative 6

165. The Forest Service should implement Alternative 6.

Response

Alternative 6 was not given further detailed study in this analysis as it did not meet the purpose and need for action, which is to ensure conservation of habitat to support continued recovery of the grizzly bear population in the six GYA forests. (FEIS section 2.2.2)

Natural resources management

Area management

Preservation and restrictions

166. The Forest Service should protect wild and pristine areas.

- Because of its value to individuals
- To preserve native wildlife and its habitat
- To act as an international role model
- Because we are stewards of the land
- From development
- To protect our national heritage
- Because the grizzly has symbolic value
- To preserve nature for future generations

167. The Forest Service should protect and restore public lands and develop a system to evaluate habitat needs.

Response

The PCA is protected in all action alternatives, which includes some of the most remote and rugged country in the lower 48 states. This protection is described as maintaining secure habitat at or above 1998 levels and maintaining the number and capacity of developed sites at or below 1998 levels. Restoration is considered in Alternative 4 inside the PCA and also expands protections for the grizzly bear beyond the PCA.

Monitoring, enforcement, and analysis

Monitoring of grizzly bear

168. The Forest Service should conduct monitoring at the local level.
169. The Forest Service should monitor grizzly activity on private land.
170. The Forest Service should implement a comprehensive monitoring system that can trigger management responses under a variety of conditions.
171. The Forest Service should develop criteria for monitoring recovery programs and provide measurable thresholds to account for future change.

Response

All action alternatives require monitoring of changes in developed sites, motorized access levels, and habitat effectiveness throughout the PCA. Alternatives 2-Modified and 4 require monitoring of secure habitat levels, livestock conflicts, and whitebark pine occurrence, productivity, and health inside and outside the PCA. All six national forests would conduct this required monitoring in a coordinated effort. This monitoring information, along with population information gathered by the national parks and state wildlife management agencies, would be included the IGBST's Annual Report and used to evaluate annually the status of the grizzly bear population and habitat. It is not possible to develop thresholds for individual monitoring components or to speculate on the actions necessary based on future conditions. Rather, the population and habitat monitoring results would be evaluated in a comprehensive manner, as identified in the Conservation Strategy, and appropriate actions taken when necessary.

Deviations from identified monitoring parameters would be evaluated annually in the context of the health of the grizzly population and its habitat and could result in a Biology and Monitoring Review or even the recommendation for a Status Review (Conservation Strategy chapter 6). The Conservation Strategy is an adaptive document and the need for additional monitoring or changes in management direction will be considered as necessary.

Grizzly bear activity on private lands would be monitored by each of the respective state wildlife management agencies under the direction of their state grizzly bear management plans and reported with all other monitoring information in annual reports and reviews by the IGBST and the YGCC.

Enforcement and implementation

172. The Forest Service should provide adequate implementation and enforcement programs to ensure success of the forest plan.

Response

Budget to implement the various alternatives is discussed in the FEIS in section 3.14. Outreach and education, grizzly bear/human conflict management, sanitation, and monitoring are recognized as costs of implementation. Law enforcement is assumed to remain at the same level that has occurred while the bear populations met recovery objectives.

Analysis of cumulative effects

173. The Forest Service should conduct an accurate analysis of the cumulative effects of the current proposal.
- Because of the economic impact on the livestock industry
174. The Forest Service should address forest disease and die-off in the cumulative effects section of the Final EIS.
- With respect to grizzly bear food sources
175. The Forest Service should address global warming in the cumulative effects section of the Final EIS.

Response

It is recognized that climate changes and forest diseases may affect the future availability of key foods for grizzly bears. The cumulative effects section in the FEIS (section 3.16) contains discussion on the potential impact to grizzly bears due to changes in the availability of grizzly bear food sources from forest diseases and global warming. The economic impact on the livestock industry is discussed in section 3.14.

Wildlife management**Wildlife management general**

176. The Forest Service should protect wildlife and its habitat.

- For future generations
- To prevent species extinction
- To restore the balance of nature
- Because wildlife has environmental and economical value
- Because of the administration's environmental policy

177. The Forest Service should protect endangered species from extinction.

178. The Forest Service should manage to allow for wildlife and multiple-use to coexist.

Response

Sections 3.4 and 3.4.1 of the FEIS provide information on species of wildlife and fish that are listed under authority of the ESA. Existing forest plans (Alternative 1) meet existing requirements for listed species (except Canada lynx) as defined in consultations, biological opinions, and recovery plans for these species. For Canada lynx, the Forest Service is currently in the process of amending 18 forest plans in the Northern Rockies to incorporate management direction needed for lynx conservation that was not included in the existing plans (USDA Forest Service and USDI BLM 2004a). The other alternatives in the FEIS do not change existing forest plan management direction that maintains or improves habitat or otherwise benefits listed species. Many of the standards and guidelines in the alternatives have complementary or additive beneficial effects on these listed species when compared to Alternative 1, and this is displayed in the FEIS in section 3.4.1.

Sections 3.4 and 3.4.2 of the FEIS provide information on Forest Service sensitive wildlife and fish species. Existing forest plans (Alternative 1) meet all requirements for sensitive species as defined by Forest Service policy. The other alternatives in the FEIS do not change existing forest plan management direction that maintains or improves habitat or otherwise benefits sensitive species. Many of the standards and guidelines in the alternatives have complementary or additive beneficial effects on these sensitive species when compared to Alternative 1, and this is displayed in the FEIS in section 3.4.2.

Sections 3.4 and 3.4.3 of the FEIS provide information on species that are designated MIS under the existing forest plans. Existing forest plans (Alternative 1) meet all requirements for MIS as defined by Forest Service policy. The other alternatives in the FEIS do not change existing forest plan management direction that maintains or improves habitat or otherwise benefits these MIS. Many of the standards and guidelines in the alternatives have complementary or additive beneficial effects on these MIS when compared to Alternative 1, and this is displayed in the FEIS in section 3.4.3.

As displayed in the FEIS, many multiple use activities are presently occurring on National Forest System lands while at the same time wildlife habitat and wildlife populations are being maintained as required by law and Forest Service policy. Alternative 2-Modified would provide habitat for a recovered grizzly bear population and would have complementary or additive beneficial effects on other species of wildlife, while still providing for other multiple use activities.

Grizzly bear management

Adequacy of analysis

179. The Forest Service should research human-grizzly bear conflicts.
- Throughout the Greater Yellowstone Area
180. The Forest Service should evaluate the effects of wolves on grizzly bear populations.
181. The Forest Service should address uncertainties in grizzly habitat and population numbers, with regard to their short- and long-term consequences.
182. The Forest Service should not consider the environmental consequences on non-essential experimental gray wolf populations in a grizzly bear document.
183. The Forest Service should consider potential grizzly population declines in the Draft EIS.
184. The Forest Service should establish and enforce acceptable mortality quotas for state-managed grizzly bear habitats outside the Primary Conservation Area.
185. The Forest Service should perform the required analysis and disclosures of minimum grizzly management requirements in compliance with the National Environmental Policy Act and the National Forest Management Act.
186. The Forest Service should conduct a critical analysis of the status of bears on National Forest System lands.
187. The Forest Service should consider the inadequacy of using 1998 habitat baseline data for grizzly bear management.
- To comply with the Endangered Species Act
188. The Forest Service should consider the inadequacy of using 1912 and 1920 data for grizzly bear management.
- To offer adequate connectivity between grizzly bear populations

Response

Grizzly bear/human conflicts throughout the Greater Yellowstone Area are presented and analyzed in the FEIS in section 3.3.2.

The IGBST and other scientists are studying the effects of wolves on grizzly bear populations. Since wolves were reintroduced into the GYA in 1995, the grizzly bear population has continued to increase and expand in distribution. Studies on the effects of wolves will continue and will be reported by the scientists who are conducting the research (FEIS section 3.16).

Uncertainties in grizzly habitat and population numbers, with regard to their short- and long-term consequences, are discussed in the section 3.16 of the FEIS.

The Forest Service is required by law and policy to consider the environmental consequences on non-essential experimental gray wolf populations and other listed species under the ESA when changes in management direction on National Forest System lands are being proposed.

Section 3.3.6 in the FEIS identifies the management actions that would occur if there were a grizzly population decline. The Conservation Strategy establishes the acceptable mortality quotas for state-managed grizzly bear habitats outside the PCA. Results of habitat monitoring, along with the demographic (population) and foods monitoring required under the Conservation Strategy would be reviewed annually by the YGCC. The Conservation Strategy requires a Biology and Monitoring Review if population or habitat standards are not met. This coordinated approach would better ensure that potential threats to the grizzly bear or its habitat are evaluated quickly and efficiently.

The Forest Service has performed the required analysis and effects disclosures of grizzly bear management requirements in compliance with the NEPA and the NFMA. The status of grizzly bears and habitat on National Forest System lands for the six GYA national forests is displayed in the FEIS.

The 1998 habitat baseline is considered adequate for grizzly bear management because by 1998 all demographic recovery criteria were met and the population was increasing in size and distribution (FEIS section 2.1.2). The level of habitat security and other habitat conditions in 1998 provided the base environment that led to the growth of the bear population. The Conservation Strategy also states that it is the goal of the habitat management agencies to maintain or improve habitat conditions as of 1998, as measured within each subunit within the PCA, while maintaining options for resource management activities at approximately the same level as existed in 1998. The grizzly population achieved all demographic recovery goals by 1998 with this management regime in place.

Connectivity between grizzly bear populations is discussed in section 1.7.2 of the FEIS and on page 37 of the Conservation Strategy. The comment about data from 1912 and 1920 being used most likely refers to some of the genetic analysis that has been done, comparing changes in genetic make-up from current populations to the earlier populations.

Laws, policies, and plans

189. The Forest Service should continue with current management plans for conservation of grizzly bears.

- Because the grizzly bear has recovered

190. The Forest Service should make a new plan, which focuses on the biological needs of the grizzly and demonstrates the ability for long-term grizzly survival.

191. The Forest Service should revise their current grizzly bear plans for the Yellowstone region.

- To fully recognize grizzly bear habitat needs

192. The Forest Service should address the inadequacies of post-delisting state management plans.

193. The Forest Service should recognize that grizzly bear protection measures could preclude management options for increasing sage grouse numbers.

Response

The Conservation Strategy was developed through a cooperative effort with biologists and scientists from the USFWS, U.S. Geological Survey, Forest Service, BLM, and the Idaho, Montana, and Wyoming state wildlife management agencies. All relevant scientific peer-reviewed information was considered in the development of the Conservation Strategy. Input from other scientists and the public was solicited throughout the development of the Conservation Strategy. The Yellowstone grizzly bear population and its habitat have been the consistent focus for research and monitoring by the IGBST for 30 years. The IGBST was a key player in the development of the Conservation Strategy; all information generated through this long-term research and monitoring effort was directly available in the development of the Conservation Strategy.

Alternative 2-Modified would incorporate some additional guidance and direction for grizzly bear habitat management beyond that in DEIS and the Conservation Strategy, including additional direction for keeping human attractants unavailable to bears, maintaining important food sources, and resolving grizzly bear/livestock conflicts both inside and outside the PCA. All action alternatives would provide sufficient habitat to maintain the grizzly bear population at recovery levels as identified in the Recovery Plan and the Conservation Strategy.

The current status of the grizzly bear population is presented in section 3.3.3 in the FEIS. Current research suggests the grizzly bear population has increased between 4 and 7 percent annually and has increased its distribution in the GYA by almost 50 percent since the 1970s. Peer-reviewed scientific literature was used to present the population status in the FEIS.

A discussion of the state grizzly bear management plans has been added to the FEIS.

Responses to Comments

The effects of alternatives on sage grouse habitat are displayed in the FEIS in section 3.4.2. Grizzly bear protection measures do not preclude management options for improving sage grouse habitat and increasing sage grouse numbers.

Process and methods

194. The Forest Service should develop grizzly population and habitat targets and management standards for all border populations.
195. The Forest Service should limit the rates of human-caused grizzly bear mortality.
196. The Forest Service should focus public information on the causes and locations of human-induced bear mortality.
197. The Forest Service should provide accurate and up-to-date information about grizzly bear present and future population numbers to the public.
198. The Forest Service should promote and publicize local solutions to human-grizzly bear conflicts.

Response

Developing grizzly bear population and habitat targets and management standards for all border grizzly bear populations (between Canada and the United States.) is outside the purpose and need of this FEIS, which is described in section 1.2. Interagency subcommittees for each of the border grizzly bear populations are working on grizzly bear recovery efforts; the Forest Service has representatives on each of these subcommittees. See response to comments 5-12.

Human-caused grizzly bear mortality is presented in section 3.3.2 of the FEIS. All alternatives are designed to provide grizzly bears with secure habitat and reduced rates of grizzly bear mortality that are associated with Forest Service management activities.

Information and education efforts have been a long-term effort by the Forest Service and other government agencies and private organizations, and this is discussed in section 1.1 of the FEIS. Section 3.3.3 of the FEIS provides up-to-date information about the grizzly bear population and its distribution in the GYA. State grizzly bear management plans would allow bears to be managed outside the PCA in areas that are biologically suitable and socially acceptable. The Alternative 4 area outside the PCA is very similar to the area identified in the Wyoming Grizzly Bear Management Plan as being the biologically suitable and socially acceptable area for management of grizzly bear populations in Wyoming. For Idaho and Montana, the Conservation Strategy identifies the larger areas where biologically suitable and socially acceptable determinations will be made. Further refinements would likely take place on a case-by-case basis as these areas are occupied by grizzly bears. The Forest Service would work with the states as these areas are identified.

The Forest Service recognizes the importance of working with the public to develop solutions to grizzly bear/human would work with local governments and other agencies when developing food storage requirements outside the PCA. Working with the public is also discussed in response to comments 402-409.

Grizzly bear protections

199. The Forest Service should protect the grizzly bear.
 - As good stewards of the environment
 - Because grizzly bears are part of our heritage
 - To ensure its survival
 - For future generations
 - Because of its value to individuals
 - With the strongest protections possible
 - Because of its ecological value and economic value
 - Because of their meager population size

- To restore the balance of nature
- To avoid inbreeding

200. The Forest Service should cease to protect grizzly bears.

201. The Forest Service should favor long-term grizzly bear protection over the short-term benefits of natural resource development

202. The Forest Service should consider making more strategic grizzly bear protections.

- But nothing less strict than Alternative 3

Response

Under the ESA, the Forest Service must conserve habitat and actively work toward the delisting of threatened and endangered species. The role of the Forest Service is to actively manage to achieve recovery of a species, not just mitigate management actions. The Conservation Strategy was developed through a cooperative effort with biologists and scientists from the USFWS, U.S. Geological Survey, Forest Service, BLM, and the Idaho, Montana, and Wyoming state wildlife management agencies. All relevant scientific peer-reviewed information was considered in the development of the Conservation Strategy and the FEIS. Input from other scientists and the public was solicited throughout the development of the Conservation Strategy. The Yellowstone grizzly bear population and its habitat have been the consistent focus for research and monitoring by the IGBST for 30 years. The IGBST was a key player in the development of the Conservation Strategy; all information generated through this long-term research and monitoring effort was directly available in the development of the Conservation Strategy.

The purpose and need of the FEIS is to incorporate the habitat standards and other relevant provisions in the Conservation Strategy into the forest plans for the six GYA national forests. All action alternatives would provide sufficient habitat to maintain the grizzly bear population at recovery levels as identified in the Recovery Plan and the Conservation Strategy. Alternative 2-Modified was created between the DEIS and FEIS. Alternative 2-Modified incorporates some additional guidance and direction for grizzly bear habitat management beyond that noted in the DEIS and the Conservation Strategy, including additional direction for keeping human attractants unavailable to bears, maintaining important food sources, and resolving grizzly bear/livestock conflicts both inside and outside the PCA.

The current status of the grizzly bear population is presented in section 3.3.3 in the FEIS. Current research suggests the grizzly bear population has increased between 4 and 7 percent annually, and has increased its distribution in the GYA by almost 50 percent since the 1970s. Peer-reviewed scientific literature was used to present the population status in the FEIS. The habitat standards and guidelines that will be incorporated into the six GYA national forest plans are the conditions that have allowed the grizzly bear population to increase in numbers and distribution.

Concerns about inbreeding in the grizzly bear population have been analyzed and addressed in the Conservation Strategy on page 37.

The Forest Service cannot cease to protect grizzly bears because this would be in violation of law and policy.

Nuisance animals management

203. The Forest Service should have damage control agents appropriately deal with nuisance bears.

204. The Forest Service should manage nuisance bears in a way which is consistent with its previous reliance on the Anderson study.

205. The Forest Service should include nuisance bear guidelines that do not result in the death of grizzly bears in the Final EIS.

206. The Forest Service should consider removing nuisance grizzly bears that kill lawfully permitted livestock inside the Primary Conservation Area instead of closing down livestock allotments.

Responses to Comments

207. The Forest Service should allow ranchers outside of the Primary Conservation Area to protect their livestock from grizzly bear depredations.
208. The Forest Service should issue hunting licenses to local citizens for the purpose of hunting nuisance bears in the Yellowstone Ecosystem.

Response

Grizzly bears inside the PCA would be managed according to Standard 5, which requires the Forest Service to coordinate with the states on the nuisance bear standards from the Conservation Strategy (FEIS appendix G). These guidelines were developed in cooperation with each of the state wildlife management agencies, the NPS, the USFWS, and the Forest Service. The state wildlife management agencies and the national parks are the lead management authorities when it comes to the management of nuisance bears. The nuisance bear standards provide mechanisms for dealing with grizzly bear/livestock conflicts. Bears involved in livestock depredations inside the PCA would be relocated at least once as conditions warrant but could be removed if they continue to kill livestock after relocation. Removal of female bears would be minimized. Alternatives 3 and 4 require the retirement of grazing allotments with recurring conflicts inside the PCA. Alternative 2-Modified includes allowances for the retirement of grazing allotments with recurring conflicts that cannot be resolved through a modification of grazing practices, but only with willing permittees.

Management of livestock-depredating grizzly bears outside the PCA would be guided by individual state grizzly bear management plans. Alternative 4 requires the retirement of grazing allotments with recurring conflicts outside the PCA. Alternative 2-Modified also includes allowances for the retirement of grazing allotments outside the PCA with recurring conflicts that cannot be resolved through modification of grazing practices, but only with willing permittees.

Hunting of grizzly bears, under the authority of the state wildlife management agencies, would likely be permitted at some point after delisting. Hunting mortality would be included as part of the overall mortality limit for the GYA as identified in the Conservation Strategy.

Grizzly bear food sources

209. The Forest Service should continue to manage essential food sources in the Primary Conservation Area for grizzly bears.
210. The Forest Service should include management directives for the monitoring of grizzly bear food sources in the Final EIS.
211. The Forest Service should account for potential loss of food source due to human development in its grizzly management plan.
212. The Forest Service should recognize the Wyoming Salt River and Wind River Ecosystems as essential to grizzly bear recovery due to the abundance of whitebark pine in those areas.
213. The Forest Service should remove trees that harbor disease and insect vectors to prevent infestation of whitebark pines.
214. The Forest Service should reseed whitebark pine trees in wildfire burn areas to provide more grizzly food sources.
215. The Forest Service should identify and protect huckleberry producing areas and other alternative food source areas in the Final EIS.
216. The Forest Service should include comprehensive discussion of its options with regard to the protection of grizzly food sources.
217. The Forest Service should include an assessment of the potential effects of climate change on grizzly habitat and food production.

Response

Alternatives 3 and 4 would use seasonal area closures to ensure important foods are available to bears. Alternative 2-Modified includes direction for maintaining the productivity, to the extent

feasible, of the four key grizzly bear foods sources with special emphasis on maintaining and restoring whitebark pine stands. Whitebark pine occurrence, productivity, and health would be monitored. The Conservation Strategy contains additional direction for monitoring cutthroat trout, ungulate winter ranges, and army cutworm moth aggregation sites.

Public land comprises almost 98 percent of the PCA. Human development on these public lands would be limited as directed by the standards and guidelines in Alternative 2-Modified. Alternatives 2-Modified and 4 provide direction and guidance for accommodating grizzly bears outside the PCA. This could help to offset any loss of carrying capacity in the area currently occupied by grizzly bears (FEIS section 3.3.1) due to reduction in the availability of important foods.

The Wyoming and Salt River Ranges are not currently suited for grizzly bear occupancy according to the Wyoming Grizzly Bear Management Plan.

On removal of diseased trees, the national forests in the GYA have increased salvage sales to remove dead and dying trees. Most whitebark pine stands, because of their high elevation and remote location, would not be affected by these activities and would remain susceptible to insects and disease. The most recent timber sale activities have focused salvage sales near communities and structures at risk to wildfire.

Reseeding and planting of whitebark pine has occurred in several areas in the GYA. Alternatives 2-Modified, 3, and 4 include direction to maintain and restore whitebark pine stands inside the PCA. Alternatives 2-Modified and 4 provide additional direction for whitebark pine stands outside the PCA. The appropriateness and feasibility of planting would be evaluated in the implementation of that direction.

None of the alternatives contain specific direction for identifying and protecting huckleberry stands or other alternative grizzly bear foods. Timber management activities would be limited inside the PCA under the secure habitat standard. In addition, the Conservation Strategy states, "The agencies are committed to be responsive to the needs of the grizzly bear by dynamic management actions based on the results of detailed annual population monitoring and habitat monitoring" (Page 15). (See response to comments 45 and 46.)

Because it is a high elevation species, management actions to improve or restore whitebark are limited to prescribed burning and hand planting of rust-resistant whitebark pine for remote areas, but a wide variety of silvicultural and prescribed burning techniques are available if restoration sites were located near roads. Recent research shows promise in restoring declining whitebark pine stands (FEIS section 3.6). Wildland fire use appears to be the most practical tool for whitebark pine restoration in the GYA because of its roadless setting. It appears that the single greatest process for ensuring the continued presence of whitebark pine on the landscape is to maintain the flow of seeds across the landscape and this is only possible if Clark's nutcrackers (the only dispersal agent) can cache these seeds in disturbed areas. Planting burned areas with apparent rust-resistant seedlings would accelerate the restoration process. Additional research may identify other opportunities to maintain or improve whitebark pine stands.

See response to comments 173-175 and section 3.16 in the FEIS for a discussion of the effects of climate change on grizzly habitat and food production.

Grizzly bear habitat management

218. The Forest Service should maintain existing grizzly bear habitat.

- To ensure future sustainability of grizzlies
- To guard against natural resource development

219. The Forest Service should restore grizzly bear habitat.

- To prevent the need for a breeding program

220. The Forest Service should maintain the integrity of grizzly bear habitat.

221. The Forest Service should provide direction for the Greater Yellowstone forests to restore quality habitat, especially in the Gallatin Forest.

Response

Habitat protections identified in all action alternatives would maintain the habitat levels inside the PCA that resulted in the recovered grizzly bear population. Additional direction is included in Alternatives 2-Modified and 4 for areas outside the PCA to minimize conflicts and accommodate grizzly bears in currently occupied areas and in areas identified as biologically suitable and socially acceptable for grizzly bear occupancy in state management plans. There are over three million acres of secure habitat (71 percent is long-term secure) outside the PCA in the area estimated to be biologically suitable for grizzly bears that is not currently occupied by grizzly bears (FEIS section 3.3). Oil and gas development would be limited or precluded inside the PCA due to the secure habitat and developed site standards in the action alternatives. Currently there are no active oil and gas leases inside the PCA. Outside the PCA, the potential for oil and gas development in the area estimated to be biologically suitable for grizzly bears is generally low with only eight active leases (FEIS section 3.12.2).

Miller and Waits (2003) evaluated the genetic diversity of the grizzly bear population in the Yellowstone Ecosystem. In an isolated population like the Yellowstone grizzly bear, genetic declines over time are expected due to inbreeding. They found the Yellowstone grizzly bear population is not in the troubling genetic condition it was once thought to be and no immediate action is necessary. They also noted that one or two effective migrants per generation from other grizzly bear populations are appropriate to maintain or increase the level of genetic diversity. Movement of grizzly bears into the GYA could take the form of natural movements or from bears that are captured and moved into the GYA. There has been no documented movement of bears in or out of the GYA in recent times (FEIS section 3.16)). Alternatives 2-Modified and 4 provide direction and/or guidance outside the PCA to allow bears to occupy many areas and to increase the chances of future gene transfer with other grizzly bear populations. Habitat direction that would allow for grizzly bear occupancy in lands adjacent to the six GYA national forests addressed in this FEIS is outside the scope of the proposal. Direction for monitoring the genetic diversity in the GYA grizzly bear population and the potential for augmentation from other ecosystems falls under the direction of the Conservation Strategy and requires coordination with other state and federal agencies responsible for grizzly bear habitat.

In the last 17 years, road closures in the six GYA national forests have resulted in a net decrease of over 1,000 miles of road. The net reduction in road miles has contributed almost 9 percent to the current level of secure habitat inside the PCA and almost 3 percent in areas outside the PCA. This trend is expected to continue, although to a lesser degree, as many of the roads that could be decommissioned have been decommissioned inside the PCA. Outside the PCA, opportunities still exist for road decommissioning (FEIS sections 3.3 and 3.10). All action alternatives provide direction to maintain secure habitat conditions inside the PCA at 1998 levels. This level of secure habitat (83 percent secure) resulted in a recovered grizzly bear population and is higher than the levels of secure habitat on National Forest System lands in other grizzly bear ecosystems (FEIS section 3.3.2). Outside the PCA, in the area estimated to be biologically suitable for grizzly bear occupancy, 71 percent of the area is long-term secure habitat. Most of the rest of the secure habitat is managed under road density standards in existing forest plans. The Gallatin National Forest's travel management planning effort is evaluating the potential for improving identified BMUs and subunits inside the PCA. The preferred alternative in the DEIS for the Gallatin Travel Management Plan includes direction that limits increases in motorized access outside the PCA.

Laws, policies, and plans

222. The Forest Service should provide flexibility in managing recovered grizzly bear populations.

- Rather than use a single guideline for all habitat
- Comparable to current guidelines

223. The Forest Service should pursue an assessment of all potentially suitable habitat.

- And use it as a baseline in Alternative 2

224. The Forest Service should clarify their statement regarding their regulatory authority over grizzly habitat in the Draft EIS.

225. The Forest Service should add guidance that uses silviculture to improve grizzly bear habitat.

Response

The 1998 levels of secure habitat inside the PCA provided for the recovery of the grizzly bear. The allowance under Alternative 2-Modified for a temporary 1 percent deviation in secure habitat was designed to allow for a level of management activities consistent with what occurred during the recovery of the bear. It is uncertain how a higher level of motorized activity, even if roads were not open to the public, would affect grizzly bear use of habitat and what the effect would be on the grizzly bear population. Prescribed fire for vegetation management is not limited by the secure habitat standard in the action alternatives or other forest management activities that do not require building new roads. The Guidelines provide suggestions for improving habitat for grizzly bears that were not always successful, such as prescribed burning of habitat to improve food responses. Timber management projects were limited in time and space and numerous projects within a subunit were uncommon under the Guidelines and consultation with the USFWS.

The 1998 levels of secure habitat, the number of developed sites, and the number of livestock allotments and domestic sheep AUMs are specifically defined in the FEIS (appendix A). It has been documented that grizzly bear/human conflicts and grizzly bear mortality is higher in years of poor whitebark production. Production of whitebark cones and use by grizzly bears is extremely variable, making connections to carrying capacity even with whitebark pine abundance very difficult. Research has provided insights into relationships between the GYA grizzly bear and environmental variables but only at the population level. The IGBST was a primary contributor to the development of the Conservation Strategy and the habitat standards from that document were included in Alternatives 2 and 2-Modified. See section 3.3 in the FEIS for a discussion on the best estimate of the biologically suitable habitat for grizzly bears outside the PCA.

Specific direction for improving grizzly bear habitat through silvicultural treatments is not included in the action alternatives because those considerations are better made site specifically. Rather, in the development of the Conservation Strategy, it was determined that the maintenance of areas free of motorized access (secure habitat) was the key habitat component for long-term survival of grizzly bears. That is not to say that silvicultural treatments would not be used where applicable to improve grizzly bear habitat in appropriate areas. Removal of the forest canopy in some vegetation types can improve select seasonal habitat values for grizzly bears. The overall goal in the action alternatives provides direction to manage habitat to sustain the recovered grizzly bear population (FEIS section 2.1.3).

Wording for Alternative 2 on minimizing effects from activities based in statutory rights was clarified and changed to “ Minimize effects on grizzly habitat from activities based in statutory rights, such as access to private lands under the Alaska National Interest Lands Conservation Act (ANILCA) and the 1872 General Mining Law. Where the mitigated effects exceed the 1998 baseline within the affected subunit, compensate secure habitat to levels at or above the 1998 baseline, in this order: 1) in adjacent subunits, or 2) nearest subunits, or 3) in areas outside the PCA adjacent to the subunit impacted.”

Process and methods

226. The Forest Service should address habitat effectiveness needs and requirements for grizzly bears.

Responses to Comments

227. The Forest Service should identify and prioritize currently occupied and potential grizzly habitat on private lands which could be used for grizzly recovery.

228. The Forest Service should maintain consistency with the 1993 Grizzly Bear Recovery Plan in its decisions regarding habitat management.

229. The Forest Service should conduct a comprehensive assessment of grizzly bear habitat and population conditions.

Response

Secure habitat would be maintained inside the PCA under all action alternatives, though secure habitat would increase under Alternatives 3 and 4. Alternatives 2 and 2-Modified allow a temporary 1 percent reduction in secure habitat. Under Alternatives 2 and 2-Modified, even if a project were active in every subunit in the PCA on National Forest Systems lands, which is unlikely, 82 percent of the area would be maintained as secure habitat at any one time. The 1998 baseline of habitat effectiveness and motorized access route densities allowed for grizzly bear populations to expand and reach recovery. The only model of habitat quality and habitat effectiveness that has been developed is the CEM. The IGBST has a contract with Montana State University to evaluate the model's content and a funded project to link components of demographics (reproduction and survival) to output from the CEM in an effort to determine if links exists. A new section has been added to the FEIS that discusses what is known regarding the relationships between habitat and grizzly bear demographics. Access management improvements for the Gallatin National Forest subunits are being addressed through a travel management planning process. See responses to comments 218-221 and 222-225.

The Forest Service does not have the authority to evaluate the importance of private lands for grizzly bears. The Conservation Strategy recognizes that "federal land management and state wildlife management agencies have no direct management authority over private lands and do not have the ability to respond to all private land development by management actions on public lands. As private lands are developed and as secure habitat on private lands declines, state and federal agencies will work together to explore options that address impacts from private land development" (page 54). Monitoring protocols have been identified to monitor private land status and condition. The states have agreed to assist private non-profits and other entities to categorize and prioritize potential lands suitable for permanent conservation. A discussion of the effects of private land development on the grizzly bear is included in the FEIS (section 3.16).

The USFWS will append the habitat standards in the Conservation Strategy to the 1993 Recovery Plan. The habitat standards in Alternatives 2 and 2-Modified are consistent with the habitat standards in the Conservation Strategy (FEIS section 2.1.3). Alternative 4 also incorporates these standards outside the PCA, and Alternative 2-Modified provides guidance for areas outside the PCA. Most of the secure habitat in the area outside the PCA that is the best estimate of the biologically suitable habitat for grizzly bears would be maintained under existing forest plan direction (FEIS section 3.3).

A comprehensive assessment of grizzly bear habitat and population conditions was integral to the development of the Conservation Strategy and this proposal. The IGBST has over 30 years of monitoring information and numerous research efforts that validate the status of the grizzly bear population and habitat. This information was critical in the development of the Conservation Strategy and the habitat standards.

Grizzly bear habitat protections

230. The Forest Service should protect grizzly bear habitat.

- To avoid negative repercussions of commercial development and resource extraction
- In the Greater Yellowstone Area
- For future generations
- To prevent inbreeding
- To ensure the grizzly bears' survival

- For the benefit of the public
- Because of the ecological value of grizzly bears
- Because the current administration is not likely to make it a priority
- And prohibit road development
- To decrease the grizzly bears dependence on human activity
- To ensure vital food sources
- Because of low grizzly population numbers
- In the Selkirks, Cabinet-Yaak, and Purcells' Ecosystem
- In the Bighorn areas and central Rockies

Response

The Conservation Strategy was developed through an interagency effort to ensure the continued conservation of the grizzly bear and its habitat in the GYA. The ecological value of the grizzly bear and the importance of long-term survival for future generations were guiding principles in the development of the Conservation Strategy. The consequences of commercial development, resource extraction, road development, loss of genetic diversity, and the loss of important foods were all considered in the development of the population and habitat standards in the Conservation Strategy. All action alternatives in the FEIS implement or exceed the habitat standards from the Conservation Strategy for inside the PCA and Alternatives 2-Modified and 4 provide additional protections for grizzly bears outside the PCA. The developed site standard does not allow any increases in numbers or capacity of developed sites without closing or reducing capacity at other developed sites inside the PCA. The secure habitat standard was designed to limit resource development to those levels, which resulted in the recovery of the grizzly bear (FEIS section 2.1.3). Secure habitat has actually increased on all six GYA national forests over the last 17 years due to downward trends in timber harvest and a decrease in road miles (FEIS sections 3.3, 3.6., and 3.10). Alternatives 2-Modified and 4 include direction for minimizing grizzly bear/human conflicts through food storage regulations and information and education efforts both inside and outside the PCA; Alternative 3 does the same inside the PCA. Current forest plan direction provides for additional long-term protection to habitat outside the PCA on millions of acres occupied or likely to be occupied by grizzly bears (FEIS section 3.3). Population goals identified in the Conservation Strategy were determined to be adequate to maintain genetic diversity in the Yellowstone grizzly bear population, at least for the short term. (See discussion on genetics in section 3.16 of the FEIS.) Provisions for augmenting the Yellowstone grizzly bear gene pool— if natural immigration does not occur—are discussed in the Conservation Strategy. Changes in habitats due to a loss of important foods or long-term climatic changes would be monitored and management actions modified as necessary (chapter 6 in the Conservation Strategy).

Consideration of management direction for grizzly bear habitat on forests outside of the Greater Yellowstone Area is outside the scope of this proposal.

Grizzly bear habitat expansions

231. The Forest Service should expand grizzly bear habitat.

- To ensure future sustainability of grizzly bears
- Because of human encroachment on grizzly habitat
- To provide wildlife corridors
- For the benefit of the country
- Because of their ecological value
- To restore the balance of nature
- To maintain genetic diversity

232. The Forest Service should not expand grizzly bear habitat.

- Due to the adverse impact on the local economies

233. The Forest Service should provide the maximum area possible for grizzly bear habitat.

- To prevent future expenditures on grizzly bear recovery
- to compensate for future development of replacement habitat

Response

The amount of habitat necessary to achieve a recovered grizzly bear population was defined by the recovery zone in the Recovery Plan. The Recovery Plan noted that additions to the recovery zone line could occur but that the mere presence of bears outside the recovery zone line was not sufficient reason for changing the line. The amount of habitat necessary to sustain a recovered grizzly bear population was evaluated in the Conservation Strategy. The recovery zone was determined to contain the minimum seasonal habitat components needed to support the recovered grizzly bear population. Habitat standards in the Conservation Strategy were identified for the PCA and were used as a basis for alternative development in this FEIS. Additionally, state grizzly bear management plans allow bears to expand to biologically suitable and socially acceptable habitat outside the PCA. One purpose of the proposed action was to ensure conservation of habitat to sustain the recovered grizzly bear population. Alternative 2 proposes the same habitat standards as those in the Conservation Strategy inside the PCA. Alternative 3 proposes an increased level of habitat protections for bears inside the PCA and Alternative 4 proposes increased habitat protections to the PCA and areas outside. The importance of ensuring the future sustainability of the grizzly bear in the GYA while considering social and economic issues resulted in the development of Alternative 2-Modified in the FEIS. Alternative 2- Modified provides some additional level of protection for bears outside the PCA while minimizing social and economic impacts. Current management area direction in existing forest plans provides for maintenance of secure habitat in many areas outside the PCA, including the Wind River, Gros Ventre, Wyoming, and Salt River ranges, and the Palisades, Centennial, Gravelies, and Tobacco Root mountains. (See responses to comments 132 and 218-221 and section 3.3 in the FEIS.) Additionally, the May 2005 DEIS for the Beaverhead-Deerlodge National Forest's revised forest plan includes an objective to "manage for 60 percent or greater secure areas in the Gravelly landscape."

Secure habitat

234. The Forest Service should address obstacles to maintaining a secure grizzly bear habitat.

235. The Forest Service should evaluate the ability of the Greater Yellowstone Area to provide secure habitat.

236. The Forest Service should identify potential replacement habitats where changes in security have been proposed.

237. The Forest Service should maintain secure habitat at the 1998 levels.

238. The Forest Service should continue in its actions stated in Standard 1, secure habitat.

- And leave future expansion of grizzly habitat to individual states

239. The Forest Service should change the 1 percent requirement for secure habitat.

- To allow two or more projects of road construction

240. The Forest Service should abandon the 1 percent requirement for secure habitat.

- And adopt the timber management rules of Alternative 3

241. The Forest Service should clarify what is meant by "opening of a restricted road" in Alternative 2, under the section "Acceptable Activities in Secure Habitat."

242. The Forest Service should provide information regarding the efficiency of road gates and barriers in providing secure habitat.

Response

Secure habitat, by definition in the FEIS, is an area greater than or equal to 10 acres in size free of motorized access greater than 500 meters from an open or gated road or recurring helicopter

flight line, and does not include areas open to cross country OHV travel. On the six GYA national forests over the last 17 years, there has been a net reduction of over 1,000 miles of road (FEIS sections 3.1, 3.3, and 3.10). The net reduction in road miles has contributed almost 9 percent to the current level of secure habitat inside the PCA and almost 3 percent in areas outside the PCA. Timber harvest levels have also declined during this period (FEIS section 3.6.1). Secure habitat has been maintained within the PCA since 1998. The number and capacity of developed sites inside the PCA on the six GYA national forests have not increased since 1998; between 1993 and 1998, one national forest saw minor increases. Numbers of sheep allotments have declined inside the PCA in recent years (FEIS section 3.7). Off-road vehicle use has been restricted to designated routes in the Montana GYA national forests (USDI BLM and USDA Forest Service 2001); all other forests in the GYA restrict use to designated routes, with a few exceptions. The few areas within the GYA on the Bridger-Teton and Caribou-Targhee National Forests that are not restricted to motorized travel routes will need to comply with the Travel Management Final Rule (USDA Forest Service 2005e) that governs off-highway vehicles and other motor vehicle use on national forests. This Final Rule requires each national forest to identify and designate those roads, trails, and areas that are open to motor vehicle use. All national forests are expected to comply with the Final Rule within the next four years.

Grizzly bear numbers have increased dramatically on the six GYA national forests since the development of the individual forest plans and the incorporation of the Guidelines. Section 1.1 of the FEIS discusses the management actions on National Forest System lands related to habitat and mortality risk that have been instrumental in the recovery of the grizzly bear.

Management of bear attractants and adherence to other forest requirements during the hunting season, along with enforcement of road closures and travel restrictions, have always been important in the recovery efforts for grizzly bears on the GYA forests. Costs for implementation, monitoring, and law enforcement for alternatives in this FEIS are discussed in section 3.14.

Implementation of the road closures identified in the 1997 Revised Targhee Forest Plan was completed in 2005.

Site-specific decisions regarding changes in secure habitat and where and how that habitat would be mitigated would be evaluated at the project level through additional NEPA analyses.

The secure habitat standard in Alternative 2-Modified requires maintaining secure habitat at 1998 levels. Monitoring item 1 requires monitoring adherence to this standard on an annual basis. Some level of forest management activities would be allowed under the 1 percent rule, but secure habitat would be restored after project completion and 1998 levels maintained.

Occupancy of habitats by bears outside the PCA would be directed by the state grizzly bear management plans. Alternatives 2-Modified and 4 provide direction to minimize grizzly bear/human and grizzly bear/livestock conflicts in those areas identified by the states as biologically suitable and socially acceptable.

The allowance of two or more projects per subunit was considered; only one project at a time was believed to be the maximum to ensure the maintenance of a recovered grizzly bear population (FEIS section 2.2.2). Required evaluations under the Guidelines generally determined that multiple logging activities within a subunit would negatively affect bears. Several forests have existing forest plan direction that requires the maintenance of 5,000- to 7,000-acre security areas adjacent to existing project areas.

The 1 percent rule was designed to continue the level of forest management activities that existed during the period in which the grizzly bear population reached recovery. Alternatives 2 and 2-Modified would provide about the same amount of flexibility in treating vegetation as Alternative 1 (FEIS section 3.6.1). Removal of the forest canopy through timber harvest does not necessarily equate to lost habitat for the grizzly bear. Research has shown that removal of the forest canopy in some vegetation types can actually increase selected seasonal habitat value for bears (FEIS section 3.1.1)

Responses to Comments

Definitions in Figure 4 and the description of acceptable activities in secure habitat for each alternative were updated. A restricted road is defined as a road on which motorized use is restricted seasonally or yearlong and the road requires effective physical obstruction, generally gated (FEIS Figure 2). Only restricted roads with permanent barriers are acceptable inclusions in secure habitat. Opening a permanently restricted road means removing barriers and allowing public or administrative motorized access. Even if the road is then gated and used only by special permit holders, this action would be considered a project and would result in a decrease in secure habitat. Opening a gated road does not constitute a project and would not result in a decrease in secure habitat. Habitat behind locked gates is not considered secure.

Gated roads are not considered effective closures (Figure 4). The intent of restricting roads with permanent barriers is to effectively preclude motorized access. Monitoring of secure habitat inside and outside the PCA is required under Alternative 2-Modified. Road barriers that were effective in 1998 inside the PCA that become ineffective in precluding motorized access would result in a decrease in secure habitat and a change from the 1998 baseline. This would be a violation of the secure habitat standard and would have to be corrected. The secure habitat standard would apply inside the PCA regardless of future decisions regarding roadless areas.

Breeding programs, reintroductions, and relocation

243. The Forest Service should introduce grizzly bears from other areas into existing Greater Yellowstone Ecosystem populations.

244. The Forest Service should reintroduce grizzly bears to the Bitterroot National Forest.

245. The Forest Service should not define the grizzly bear population as recovered if reintroduction of bears into distinct populations is necessary.

246. The Forest Service should investigate the negative effects of its methods concerning grizzly bear relocation.

- To prevent grizzly bear mortality
- With regard to safety and economic cost
- With regard to the safety of biologists involved in the process
- And reconsider current guidelines for darting and relocation under the current management plan

247. The Forest Service should examine the effect of human development on natural grizzly bear breeding.

248. The Forest Service should prohibit development in the Selway Bitterroot Ecosystem to allow for future grizzly reintroduction.

- And promote human tolerance of bears

249. The Forest Service should promote recolonization of vacant grizzly habitat.

250. The Forest Service should evaluate the effects of limited genetic diversity and the adequacy of artificial translocation.

Response

The management of grizzly populations after delisting, including genetic diversity concerns, is the responsibility of the state wildlife management agencies and the national parks in the GYA. The possibility of augmenting the genetics of grizzly bears in the GYA is based on the best available science and is identified as a potential action in the Conservation Strategy, not a decision under this FEIS. Genetic monitoring, through hair samples collected from captured or dead bears in the GYA, would be used to determine if NCDE origin genetic material is found in the GYA. If no genetic material is found and movements are not detected into the GYA from the NCDE, appropriate actions would be taken (Conservation Strategy page 37).

The occupancy of vacant habitats outside the PCA in the GYA would be directed by the individual state grizzly bear management plans. Alternative 4 extends habitat protections to biologically

suitable habitat outside the PCA. Alternative 2-Modified includes the goal of accommodating grizzly bear occupancy in areas determined by the states to be biologically suitable and socially acceptable (FEIS section 2.1.3). See the response to comments 251-259.

Introduction of bears into the Bitterroot National Forest and prohibiting development in the Selway-Bitterroot ecosystem is outside the scope of this decision and not part of the decision to be made. The linkage opportunities for connecting grizzly bear ecosystems are in Montana and Idaho. The Yellowstone Grizzly Bear Management Plan for the State of Idaho (2002) does not preclude allowing bears to occupy new habitats. The Grizzly Bear Management Plan for Southwestern Montana (State of Montana 2002) recognizes the importance of linkage zones and has a long-term goal for grizzly bears “to allow populations in western Montana to reconnect by occupying currently unoccupied habitats” (page 34).

Wildlife linkage zones/habitat linkages

251. The Forest Service should protect habitat connectivity and restore habitat linkage areas.

- To link grizzly bear populations in disparate ecosystems
- To ensure long-term health of grizzly bears in the Yellowstone Ecosystem
- To maintain genetic diversity of grizzly bear populations
- To promote self-sustaining grizzly bear populations
- To prevent inbreeding
- Via the Centennial Mountain and valley area for linkage to Bitterroot
- As an example of preservation management
- As defined in Alternative 4

252. The Forest Service should not establish habitat linkage corridors for bears.

- Because they deny access to and use of public lands
- Due to grizzly bear conflict with people and livestock

253. The Forest Service should identify and protect habitat corridors from road building to ensure long-term recovery of grizzly bears.

254. The Forest Service should set up linkage zones to allow interbreeding of discrete grizzly bear populations.

255. The Forest Service should increase the amount of grizzly bear habitat corridors.

256. The Forest Service should maintain roadless areas outside of the Primary Conservation Area to protect habitat linkage zones.

257. The Forest Service should address habitat connectivity and habitat linkage zones throughout the Greater Yellowstone Ecosystem in the forest plan amendments.

- Because agency rules, plans and policies, and best available science demand it

258. The Forest Service should provide guidelines that allow for grizzly bear expansion and habitat linkages outside the Primary Conservation Area in the forest plan amendments.

259. The Forest Service should develop population augmentation programs to improve the prospects for connecting grizzly populations.

Response

Biologically, grizzly bears are not natural long-range dispersers like wolves, lynx, wolverine, and other wide-ranging species. Documented grizzly bear expansion in the GYA and other grizzly bear ecosystems has occurred as new female grizzly bears establish new home ranges, generally adjoining or overlapping with the ranges of their mothers. Male bears move more and occasionally occur outside female home ranges. These male bears do not add genetic material to the population until there is a female bear present for them to breed. In order for a linkage zone/corridor to effectively operate in transferring genetic diversity, female grizzly bears would need to occupy habitat from the GYA all the way to another grizzly bear ecosystem. Currently, approximately 80 to 130 miles separate known populations of grizzly bears in the GYA and the

NCDE. Current research has noted that the need for gene flow into the Yellowstone population is not urgent. Miller and Waits (2003) also noted that if gene flow does not occur naturally within two to three decades, artificial translocation should be conducted. It does not matter how bears get into the ecosystem but rather that they effectively integrate their genes into the population. The data these scientists produced show that there has been only a slight decline in genetic diversity of the Yellowstone grizzlies since the early 1900s, and that the Yellowstone population was not as genetically diverse as that in the NCDE grizzly bear population even as far back as 1910. It appears that linkage between Yellowstone and areas to the north has always been limited. Miller and Waits noted, "...it is likely that gene flow into the Yellowstone ecosystem from the north was historically restricted." This suggests that transfer of genetic material between the GYA and other grizzly bear populations was not a regularly occurring event, even before there was much development. No movement of grizzly bears in or out of the GYA has been documented in recent times.

Maintaining or creating linkage zones between ecosystems is a multifaceted issue, involves more species than just grizzly bears, and is well beyond the authorities of the Forest Service alone to address. The narrow corridors on National Forest System lands in these potential linkages are bordered by private and mixed ownership lands that would provide much of the seasonal habitat needs for grizzly bears that occupied these areas. Human developments, towns, and highways would preclude grizzly bear occupancy, limit movements in many areas, and provide a significant potential source of conflicts and bear mortality. The bottom line is: ensuring occupancy by female grizzly bears between existing bear populations would likely require significant changes in human uses and developments, primarily on private lands.

The Forest Service, in concert with the IGBC, the USFWS, and various other governmental and non-governmental groups, continues to evaluate opportunities to improve habitat connectivity and linkage zones. The IGBC has agreed through an MOU to support linkage zone identification and the maintenance of existing linkage opportunities for wildlife. The IGBC has appointed three task forces (public lands, private lands, and highways) to evaluate linkage opportunities. All alternatives in the FEIS provide for various amounts of protection to areas identified as important in maintaining or improving connectivity within the GYA (FEIS section 3.3). The state grizzly bear management plans promote grizzly bear occupancy in biologically suitable and socially acceptable habitat outside the PCA.

Recent evaluations suggest that one or two effective migrants per generation would maintain or even increase the level of genetic diversity (Conservation Strategy page 37). Given the current distance separating occupied grizzly bear habitat, it is highly unlikely that natural gene transfer will occur any time soon, regardless of habitat conditions. The Conservation Strategy recommends appropriate actions to maintain genetic diversity between the Yellowstone and the Northern Continental Divide Ecosystem grizzly populations, with monitoring and managing adaptively for genetic health, should natural migration not occur. See section 1.7.2 in the FEIS for additional discussion on connectivity and linkage zone and section 3.16 for additional discussion on genetics.

Primary Conservation Area management

260. The Forest Service should protect grizzly bears within the Primary Conservation Area to prevent grizzly bear mortality.

261. The Forest Service should protect grizzly bear habitat inside and outside the Primary Conservation Area.

- From natural resource development
- From road development

262. The Forest Service should clarify how grizzly bear habitat and the presence of grizzly bears outside the Primary Conservation Area will be managed.

263. The Forest Service should include management plans for grizzly bear habitat, inside and outside the Primary Conservation Area, in the Final EIS.

- To protect grizzly bear food sources
- To minimize human-grizzly bear conflict

264. The Forest Service should incorporate a modified version of the Management Situation guidelines from 1998 in the Final EIS.

- To protect grizzly habitat both inside and outside the Primary Conservation Area

Response

The only sure way to prevent human-caused grizzly bear mortality within the PCA is to close the PCA to all human entry. This would not be socially acceptable and is unnecessary to maintain a recovered grizzly bear population. All action alternatives are designed to reduce grizzly bear/human conflicts and human-caused mortalities from Forest Service management activities and human uses. If conflicts and mortalities are maintained at low levels, the grizzly bear population can continue to increase and expand its range. The FEIS documents scientific studies that show the grizzly bear population has increased between 4 and 7 percent annually and has expanded its range.

The goals, standards, and guidelines in Alternatives 2 and 2-Modified do not stop natural resource management activities and road developments. The standards and guidelines restrict the types and amount of natural resource management activities that can occur, and restrict the amount of road development that can occur. The standards and guidelines generally allow the level of resource management activities that have occurred on National Forest System lands during the past decade, which is the time that grizzly bear populations have been increasing and expanding their range. Alternatives 3 and 4 would reduce natural resource management activities below what has occurred during the past decade.

Alternative 2 was modified for the FEIS to include some additional direction and guidance for keeping human attractants unavailable to bears, maintaining important food sources, and resolving grizzly bear/livestock conflicts both inside and outside the PCA. Additional monitoring was added to monitor changes in secure habitat outside the PCA, the number of livestock allotments with recurring conflicts inside and outside the PCA, and the occurrence, productivity, and health of whitebark pine inside and outside the PCA.

The Management Situation guidelines in Alternative 1 would be replaced with the standards and guidelines in Alternative 2-Modified. The Biological Assessment for the preferred alternative determined that the long-term protections to habitat provided by the preferred alternative inside the PCA, the consistent coordinated habitat monitoring, and the additional habitat guidance outside the PCA would improve the potential for long-term sustainability of the grizzly bear population in the GYA over that provided by Alternative 1 and the Management Situation guidelines.

Bear Management Units

265. The Forest Service should cease to protect grizzly bears in the Plateau Bear Management Unit.

- Because it is no longer essential grizzly bear habitat
- Because it is no longer cost efficient to maintain

266. The Forest Service should allow for flexibility in the management of Bear Management Units.

267. The Forest Service should verify the number of mortalities in the Plateau Bear Management Unit between 1959 and 1993.

268. The Forest Service should consider removing the Plateau Bear Management Unit from the Primary Conservation Area.

269. The Forest Service should consider removing the Plateau Bear Management Unit from the Primary Conservation Area.

Response

The Plateau BMU was not eliminated because evaluations completed in 1993 and 1994 determined that this BMU should be kept in the recovery zone. This is discussed in section 2.2.2 in the FEIS. There is flexibility in the management of BMUs— management activities can occur as long as they do not violate the standards and guidelines. The Plateau BMU has been occupied by females with young every year since 1999.

Designation of additional habitat

270. The Forest Service should expand the Primary Conservation Area.

- Because of human encroachment on grizzly habitat
- To allow for the growth and viability of satellite populations throughout the Greater Yellowstone Ecosystem

271. The Forest Service should not expand the Primary Conservation Area.

- Due to the adverse impact on the local economies
- Because the current area is sufficient
- Due to the adverse impact on the ranching economy
- For the wellbeing of local citizens
- Because the Wyoming management plan is sufficient

272. The Forest Service should expand the Primary Conservation Area to include all occupied habitat.

- To ensure future sustainability of grizzlies
- To provide wildlife corridors
- Because of the adverse impact of climate change on grizzly food sources
- Because of human encroachment on grizzly habitat
- To guard against development

273. The Forest Service should expand the Primary Conservation Area as specified in Alternative 4.

- To ensure grizzly survival
- Because of the significant grizzly population outside the Primary Conservation Area

274. The Forest Service should expand the Primary Conservation Area beyond the Alternative 4 boundaries.

Response

Habitat standards were applied to areas outside the PCA (essentially expanding the PCA) under Alternative 4. Alternatives 2, 2-Modified, and 3 maintain the PCA as the area of application for the secure habitat, developed site, and livestock grazing standards. Based on public comment and agency concerns, additional guidance was added for Alternative 2-Modified for minimizing grizzly bear/human and grizzly bear/livestock conflicts and accommodating grizzly bear populations outside the PCA, to the extent that accommodation is compatible with the goals and objectives of other uses, in areas determined to be biologically suitable and socially acceptable for grizzly bear occupancy in state grizzly bear management plans. Occupancy of habitats outside the PCA by grizzly bears would be determined by state grizzly bear management plans. Current forest plan direction would provide secure habitat for areas currently occupied by grizzly bears outside the PCA and in other potentially suitable habitat. (See response to comment 132 and sections 3.3 and 3.3.1 in the FEIS.)

It is recognized that climate changes and forest diseases may affect the future availability of key foods for grizzly bears. Alternatives 4 would provide direction for maintenance of critical food sources outside the PCA. Guidance was added in Alternative 2-Modified to maintain the

productivity, to the extent feasible, of the four key grizzly bear foods outside the PCA. (See response to comments 173-175.) The IGBST would evaluate responses of bear populations to changing levels of key food sources.

The Alternative 4 boundary was developed using input from scoping and using the best available science on suitable grizzly bear habitat delineations. The Alternative 4 area is the best estimate of the biologically suitable habitat in the GYA for grizzly bears. There could be some other areas outside the Alternative 4 boundary that could be occupied by grizzly bears in the future, given changes in current management direction. Areas designated for grizzly bear occupancy would be determined by state grizzly bear management plans.

Domestic livestock management

Domestic livestock management general

275. The Forest Service should implement alternative management strategies for livestock-grizzly bear conflict outside the Primary Conservation Area.

- That will not negatively affect the livestock industry

276. The Forest Service should promote sustainable ranching methods on ranches bordering public lands through education.

277. The Forest Service should recognize the necessity of road use for the purposes of cattle management in the Final EIS.

Response

Alternatives 2 and 2-Modified allow cattle grazing to continue in the PCA and are more tolerant of grizzly bear/livestock conflicts than Alternative 1. In Alternative 1 in MS 1 areas, allotments with recurring grizzly bear/livestock depredations could result in the removal of all livestock and closure of the allotment. Alternatives 2 and 2-Modified require the Forest Service to coordinate with state wildlife management agencies to apply Conservation Strategy nuisance bear standards; these standards generally result in the removal of the bear and not the removal of the allotment. Sheep grazing would be phased out in the PCA in all alternatives.

Promotion of sustainable ranching is outside the scope of the proposed action because it involves private lands where the Forest Service does not have jurisdiction.

Grazing management

278. The Forest Service should phase out cattle and sheep grazing within grizzly habitat areas.

279. The Forest Service should balance grazing and wildlife management according to the multiple-use mandate.

280. The Forest Service should acknowledge, in the Final EIS, that grizzly bear habitat recovery has occurred in conjunction with livestock grazing.

281. The Forest Service should address the possible negative impacts subdividing ranches will have on grizzly bear habitat in the Greater Yellowstone Area.

282. The Forest Service should mandate flexible grazing management at local levels.

283. The Forest Service should favor the preservation of wildlife habitat over domestic livestock grazing due to the decreased economic viability of ranching.

284. The Forest Service should mention the negative impacts of grazing in the Final EIS.

285. The Forest Service should provide grazing permit holders certainty that their permits will be renewed pursuant to the Conservation Strategy and not require further analysis.

286. The Forest Service should give land managers the ability to work with permittees to develop grazing plans.

287. The Forest Service should not create new or enlarged areas of grazing restrictions.

288. The Forest Service should not use the word “close” on page 80 when referring to cattle numbers in Alternative 2.

Responses to Comments

289. The Forest Service should provide an accurate account of the number of animal months being used.
290. The Forest Service should not decrease or place restrictions on current grazing allotments.
- Without analysis under the National Environmental Policy Act
 - Including reevaluating previously closed allotments
 - And emphasize locally driven solutions to wildlife management
291. The Forest Service should retire grazing allotments with chronic livestock-grizzly bear conflicts on a voluntary basis.
- With the option to open alternative allotments outside the Primary Conservation Area
292. The Forest Service should keep all grazing allotments open in the event that advancements in science solve the problem of livestock-grizzly bear conflicts.
293. The Forest Service should increase the amount of time designated for the removal of grazing allotments.
294. The Forest Service should disclose allotments that meet the criteria for closure.
- In all alternatives throughout the EIS
295. The Forest Service should make decisions regarding grazing allotments on a case-by-case basis.
296. The Forest Service should analyze the impacts of closing grazing allotments.
- With regard to local economies
 - With regard to the impact on wildlife habitat
297. The Forest Service should consider the possible legal ramifications of not renewing livestock grazing allotments.
298. The Forest Service should review closed livestock allotments for possible reopening after the grizzly bear has been taken off the endangered species list.
299. The Forest Service should mention the role of a buyout of grazing allotments in the EIS.
300. The Forest Service should acknowledge that grazing and wildlife management are compatible and disclose all allotments that are subject to closure in the EIS.
301. The Forest Service should reconsider the number of allotments affected by Alternatives 3 and 4.
302. The Forest Service should clarify that removal of allotments under Alternative 2 is something that may happen, not will happen.

Response

Most, if not all, grizzly bears that come in contact with domestic sheep prey on sheep and conflicts are inevitable (section 3.1.2). Within the PCA, approximately 30 percent of the sheep allotments active in 2003 have had documented grizzly bear conflicts. Several sheep allotments that have had conflicts with grizzly bears have been closed.

Conflicts between livestock and grizzly bears have resulted in the relocation, removal, or direct mortality of grizzly bears. Inside the PCA, many of the conflicts with grizzly bears and sheep have been resolved due to the closure of many of the affected allotments. The majority of grizzly bears that come in contact with cattle do not make kills. Within the PCA, 24 percent of the cattle allotments active in 2003 have had documented grizzly bear conflicts. Conflicts with livestock have increased in recent years primarily outside the PCA (FEIS section 3.3.2).

Recovery of the grizzly bear in conjunction with livestock grazing is acknowledged in the proposed action. The proposed action would allow the number of allotments to remain at or below 1998 levels, the first year that all recovery criteria were met. In the FEIS, the effects of livestock grazing on grizzly bears are discussed in sections 3.3.5 and 3.16; effects of habitat standards on livestock grazing are discussed in section 3.7.

Alternatives 3 and 4 would close all sheep allotments and those portions of cattle allotments with recurring conflicts inside (Alternatives 3 and 4) and outside (Alternative 4) the PCA. In Alternative 2- Modified, a guideline was added that allows cattle allotments or portions of cattle allotments with recurring conflicts that cannot be resolved through modification of grazing practices to be retired as opportunities arise with willing permittees. Language similar to this is in the Application Rule for Alternative 2 and is stated as a guideline in Alternative 2-Modified. An Application Rule was added that gives permittees with allotments with recurring conflicts the opportunity to relocate their livestock to a vacant allotment outside the PCA, as these allotments become available, where there is less likelihood for conflicts. The Application Rule that stated “the cattle allotment with the history of chronic conflicts may be closed to grazing without further NEPA analysis” was not included in Alternative 2-Modified in response to concerns raised by management and the public. Sections 2.1.2 and 2.1.3 in the FEIS contain a description of the standards, guidelines, and Application Rules for Alternatives 2 and 2-Modified related to livestock grazing.

Cattle numbers would be similar to 1998 levels in Alternative 2 inside the PCA. The sentence using “close” on page 80 was in reference to cattle numbers inside the PCA, and figure 48 was for the entire area for the six GYA national forests.

The possible impacts of subdividing ranches on livestock operators and associated communities are discussed in the FEIS, section 3.13.3. The indirect effects of reduced grazing, as described in Alternative 4, indicate that operators and associated communities could be adversely affected to the extent that some permittees would need to sell their private lands or convert the land use to something other than livestock due to the difficulty in sustaining livestock operations.

In regards to providing an accurate account of the number of animal months being used, animal months is used to describe grazing impacts in this analysis. An animal month is a month’s time upon the rangeland by one animal and the kind and class of animal is specified. It is not synonymous with animal unit month, which is the amount of forage required by a mature cow or the equivalent for one month.

Sheep allotments

303. The Forest Service should phase out domestic sheep allotments.

304. The Forest Service should retire sheep allotments on a voluntary basis.

305. The Forest Service should urge legislative funding allocation for retiring sheep allotments.

306. The Forest Service should favor removing nuisance bears over phasing out sheep allotments in the Primary Conservation Area.

Response

In Alternative 2- Modified, existing sheep allotments would be monitored, evaluated, and phased out as opportunities arise with willing permittees. Inside the PCA, phasing out sheep allotments would be a priority in all action alternatives. In Alternatives 2 and 2-Modified outside the PCA, individual state nuisance bear guidelines would apply, which could include removal of the bear. Urging legislative funding is outside the scope of the regulatory authority of the Forest Service.

Other resource management

Timber resource management

307. The Forest Service should evaluate the full impact of timber harvest on wildlife.

308. The Forest Service should provide explicit direction regarding timber harvest.

- To prevent habitat destruction
- To prevent increased vehicle activity on logging roads

309. The Forest Service should adhere to habitat effectiveness standards in the Conservation Strategy with regard to timber harvest levels.

Responses to Comments

310. The Forest Service should allow timber harvest within the Primary Conservation Area to reduce the risk of wildfire.

311. The Forest Service should prohibit mechanical thinning of trees within secure habitat.

Response

The Conservation Strategy and this FEIS assume that changes in the distribution and quality of cover are not necessarily detrimental to grizzly bears. Section 3.3.1 in the FEIS discusses this further. Timber harvesting is not assumed detrimental to bears; rather, it is the related road construction and reconstruction that affects habitat security for the grizzly bear. Timber harvesting is allowed in the PCA to address risk of wildfire; the amount of harvesting varies by alternative because some alternatives have greater restrictions on road construction and reconstruction (for example, the 1 percent rule does not apply in Alternatives 3 or 4).

Natural resource development

312. The Forest Service should allow for natural resource development.

- Because local and national economies depend on it

313. The Forest Service should prohibit natural resource development in grizzly bear habitat.

- Despite pressure from corporate interests
- To prevent the grizzly's extinction
- To ensure grizzly recovery and viability

314. The Forest Service should address the possibility of development on national forest lands occurring under the "application rules" in Alternative 2.

315. The Forest Service should ban natural resource development and increase protections on grizzly bear habitat.

Response

In Alternatives 2 and 2-Modified, the Application Rule for secure habitat allows a project to change secure habitat permanently if secure habitat of equivalent habitat quality is replaced in the same BMU subunit. Projects could occur with temporary reductions in secure habitat if certain conditions are met according to the application rules.

The Application Rule allows up to a 1 percent temporary decrease in secure habitat based on the acreage in the largest subunit within that BMU. The acreage of a project that counts against the 1 percent limit is the acreage associated with the 500-meter buffer around any gated or open motorized access route. Another way to look at this is that a subunit averages around 200,000 acres; 1 percent of that is 2,000 acres, and when one takes into account the 500-meter buffer around a road, the 2,000 acre change in secure habitat equals about five miles of road construction. This means five miles of road could be constructed in secure habitat on a temporary basis, with the road properly restricted or decommissioned after the project is completed.

Alternatives 3 and 4 do not have the Application Rule for temporary loss of secure habitat. The effects of not allowing any reductions in secure habitat, of even a temporary nature, are examined throughout chapter 3 in the effects analysis for these two alternatives, with Alternative 4 involving a larger area than Alternative 3. One alternative that was developed but not studied in detail suggested the Forest Service reduce the area of habitat protection and the amount of restrictions for the grizzly bear and allow more natural resource development to better support local economies. This alternative was not given further detailed study in this analysis as it did not meet the purpose and need for action, which is to ensure conservation of habitat to support continued recovery of the grizzly bear population in Greater Yellowstone Area national forests. The standards and Application Rules in the Conservation Strategy were identified as the management limitations necessary to sustain a recovered grizzly bear population upon delisting.

Mining and mineral exploration

316. The Forest Service should acknowledge the economic value of phosphate mining.

317. The Forest Service should discuss the alternatives' potential impacts to lease holders of locatable minerals.

Response

The economic value of mining, including phosphate mining, is discussed in the FEIS (section 3.14). No effects on the economic value of existing leases for phosphate mining are anticipated because existing mineral leases will be honored. For areas that are not currently leased, the expanded habitat standards and application rules do not preclude development, but require grizzly bear needs be considered and addressed in the prescribed manner. This requires additional mitigation and conditions to minimize effects on grizzly bears, and is likely to increase the costs of operation. Potential impacts to lease holders of locatable minerals are discussed in the FEIS, section 3.12.1.

Oil and gas

318. The Forest Service should prohibit oil and gas development and exploration.

- For the survival of the grizzly bear
- In grizzly bear habitat
- On national forest property

319. The Forest Service should eliminate current oil and gas leases inside the Primary Conservation Area.

- To protect grizzly bear habitat

Response

Prohibiting future oil and gas development and exploration are part of the standards for Alternatives 3 and 4, and the effects are displayed in chapter 3. Alternative 4 would prohibit future leasing in a larger area than Alternative 3. Existing leases will be honored in all alternatives. A variation of Alternative 4 that would terminate or remove current oil and gas leases is discussed in section 2.2.3 but is not analyzed in detail because the Forest Service and BLM have limited authorities to implement this alternative. Under Alternatives 2 and 2-Modified, only 3 percent of the PCA allows surface occupancy. Any proposed oil and gas development would have to meet both the secure habitat and developed site standards.

Alternative energy sources

320. The Forest Service should promote the use of alternative energy sources.

- To preserve the natural environment
- Instead of pursuing oil and gas development

321. The Forest Service should collaborate with other branches of the federal government to explore alternative energy sources.

322. The Forest Service should request that government leaders pursue alternative energy sources instead of degrading wildlife habitat for future generations.

323. The Forest Service should base its energy policy on scientific fact instead of economic gain.

- To decrease the United States' dependence on nonrenewable fuels

324. The Forest Service should invest in new technology to lessen the United States' dependence on foreign oil.

Response

The level of potential for oil and gas production is low inside the PCA (FEIS section 3.12.2). All action alternatives, while not directly prohibiting the development of oil and gas in the PCA, increase the amount of mitigation needed. If operations were proposed in secure habitat, other sites and roads would have to be closed so that the level of secure habitat or the number of sites would not change from the 1998 level. Alternative energy sources were not examined as part of an alternative to reduce oil and gas leasing because the decisions on availability and

authorization of leasing on National Forest System lands in the GYA are not part of the purpose and need nor a decision to be made with these forest plan amendments.

Transportation and recreation management

Transportation system management

325. The Forest Service should work toward reducing the need for roads.
326. The Forest Service should not build additional roads within grizzly bear habitat.
327. The Forest Service should manage roads to reduce their impact on the environment and wildlife.
328. The Forest Service should implement a process for managing open and total motorized access route densities.
- Rather than merely reporting them
329. The Forest Service should direct funds from the recreational trails program and gas tax to off-highway vehicle trail construction and maintenance.

Response

Between 1986 and 2003, about 1,400 miles of road were decommissioned in the GYA national forests, with less than 400 miles of road being constructed—a net reduction of over 1,000 miles of road. These tended to be roads that were in excess of what was needed for management or recreational activities, or were difficult or expensive to maintain, or both. Much of the road decommissioning has taken place inside the PCA with little accompanying road construction, for a net reduction of 630 miles of road. Road densities and secure habitat are closely linked. Because secure habitat is defined as areas greater than or equal to 10 acres in size and more than 500 meters from an open or gated motorized access route or recurring helicopter flight line and not open to cross country OHV travel, any changes in motorized route density could change secure habitat. The secure habitat standard requires the percent of secure habitat within each BMU subunit be maintained at or above levels that existed in 1998. It was felt unnecessary to have secure habitat and road density due to the redundancy in tracking both measures. The only way that road density could increase without affecting a change in secure habitat is if a road were built between two existing roads that are less than 1,000 meters apart. Building new roads in this context would be rare (FEIS section 3.1.2).

Analysis of routes

330. The Forest Service should not require motorized recreationists to identify and inventory roads and trails to remain open.
331. The Forest Service should identify all existing motorized roads and trails as the baseline for travel management decisions.
332. The Forest Service should present an accurate range of costs for road recontouring and obliteration in figure 102 of the DEIS.
333. The Forest Service should use verifiable data to demonstrate environmental improvements which result from the closure of motorized routes.
- To justify restricted human access

Response

Neither the proposed action nor an alternative in the FEIS requires motorized recreationists to identify and inventory roads and trails to remain open. All motorized routes within the PCA have been identified as part of the 1998 baseline for secure habitat management. Costs for road obliteration are average costs. These costs were reviewed and increased from \$2,500 per mile to \$3,000 per mile, based on historic costs of road decommissioning on national forests in the GYA. The management of human use levels through access route management is one of the most powerful tools available to balance the needs of grizzly bears with the needs and activities of humans. It has been documented in several research projects, completed and ongoing, that

unregulated human access and development within grizzly bear habitat can contribute to increased bear mortality and affect bear use of existing habitat (FEIS section 3.3.2).

Mitigation

334. The Forest Service should attempt to mitigate the impacts from the Trans Canada Highway and railroad on grizzlies and other wildlife in the central Rockies.

335. The Forest Service should mitigate the impacts of roads rather than close them.

- In response to resource impact concerns
- In response to access or sanitation concerns

Response

The Trans Canada Highway and railroad do not pass through the GYA and were not considered in this analysis because they do not affect the Yellowstone grizzly bear population.

Alternatives 3 and 4 would require road closures as an indirect effect in order to increase secure habitat to a level of 70 percent in each BMU subunit or analysis unit. Impacts on motorized recreationists are described in section 3.9.4; it is recognized that displacement of users would occur in those alternatives. In order to increase secure habitat, road closures through decommissioning are required (FEIS section 3.3.2), not gating them or restricting the width of vehicles using them.

Closure, obliteration, and reclassification

336. The Forest Service should change the standard for closing motorized trail use in roadless areas to a guideline.

337. The Forest Service should clarify where off-road vehicle trails can be constructed and maintained.

338. The Forest Service should close and obliterate targeted roads to increase bear habitat security.

339. The Forest Service should recognize that eliminating funding for maintenance of motorized routes may leave trails impassible even to non-motorized users.

340. The Forest Service should reconsider decommissioning roads and trails that are heavily used.

- Because bears would not be denning in areas of high use

341. The Forest Service should reconsider proposed policy of decommissioning roads within one year of construction.

342. The Forest Service should address the potential negative effects of decommissioning roads on soils and water quality.

- Because of the inability to remove fuels

343. The Forest Service should reclassify roads to “restricted” or “unrestricted-width,” in lieu of obliteration.

- Because of the negative impacts of road obliteration

Response

In Alternatives 3 and 4, maintaining roadless areas as roadless with no motorized use was a standard because no site-specific deviations would be permitted. A guideline was not considered because it did not meet the intent of Alternatives 3 and 4, which was to consider more restrictive habitat standards for grizzly bears. Alternatives 2 and 2-Modified, on the other hand, do not propose removing motorized access routes in roadless areas.

Where motorized roads can be constructed and maintained is not part of the proposed action. Any site-specific decision on road construction must be consistent with the appropriate GYA forest plan.

Only Alternatives 3 and 4 require road decommissioning in order to increase secure habitat, with the greatest number of miles to be decommissioned on the Gallatin National Forest. Directing the

Responses to Comments

Targhee and the Gallatin National Forests to close roads is not part of the proposed action. Motorized routes will be determined through the Gallatin National Forest's travel management planning process (Conservation Strategy page 44).

Eliminating motorized use does not necessarily mean routes will become impassable to non-motorized travel. Trail maintenance takes place through a variety of funds in the Forest Service and with volunteer groups such as Backcountry Horseman.

For analyzing effects, roads were not analyzed as whether they were high use or otherwise because road decommissioning is an indirect effect of implementing Alternatives 3 and 4 and effects were considered programmatic in nature. Subsequent project level NEPA would be required for actual closures or decommissioning.

The policy of decommissioning roads one year after completion of a project was not reexamined because it is recognized that projects that have a shorter duration have less of an impact on wildlife, not only for grizzly bears but also for other species such as elk. Past consultation with USFWS has indicated road closures shortly after completion of a project is beneficial to a species.

Decommissioning roads generally reduces sources of sedimentation because roads are no longer connected to streams. Roads are revegetated as part of decommissioning. Decommissioning roads could lead to longer response times and larger fires across the GYA based on current fire management capabilities (FEIS section 3.6.2). Larger burns do not necessarily contribute sediment unless the fire is severe (FEIS section 3.5).

Restricting roads to certain widths would not meet the intent of increasing secure habitat in those alternatives where secure habitat would be increased. Road decommissioning best meets the intent of increasing secure habitat (FEIS section 3.3.2) rather than width restrictions because motorized use would still take place.

Recreation

344. The Forest Service should use the motorized recreational plans of the Umatilla-Whitman, Rogue River, and Fishlake National Forests, and the Bureau of Land Management as a template for other national forests.

345. The Forest Service should consider the economic benefits of motorized recreation to local and state governments.

346. The Forest Service should maximize existing recreational opportunities and plan for an increase in recreation.

Response

The purpose of the proposed action and the FEIS is to ensure conservation of habitat to sustain the recovered grizzly bear population (FEIS section 1.2). The proposed action does not entail the development of motorized recreation plans, but recognizes that other related efforts, including amendments and revisions of forest plans, may address travel management more directly (FEIS section 1.5). To the extent feasible, these efforts are coordinated so they do not conflict.

The FEIS considers motorized use as an important recreational pursuit (FEIS sections 3.9.3 and 3.13.2). Motorized and non-motorized uses contribute to local economies primarily through local services and retail trade (FEIS section 3.14). A study available between draft and final EIS indicates comparable benefits from non-motorized recreation and motorized recreation to the economies (considered for a three-county area influenced by the Gallatin National Forest). The results indicate a contribution of less than 1 percent of the total employment in the three-county area (USDA Forest Service 2005a).

The FEIS notes that the GYA is a local and national treasure that attracts several million national and international visitors each year and that recreation is a key value of the area (FEIS section 3.9.1). The FEIS also notes that recreation use has increased and is expected to continue to increase in the future (FEIS section 3.9.3). Because of these increasing uses, the intent of this

FEIS is to ensure that grizzly bear habitat is maintained for the recovered population (FEIS section 1.2).

General recreation concerns

347. The Forest Service should decrease allowable human recreation in bear habitat.

348. The Forest Service should communicate denning locations to users.

349. The Forest Service should manage motorized and non-motorized recreation groups equally.

- With regard to noxious weed mitigation measures
- By alternative weeks for motorized and non-motorized use
- With regard to recreation restrictions and closures

Response

The purpose of the proposed action and the FEIS is to ensure conservation of habitat to sustain the recovered grizzly bear population (FEIS section 1.2). Population recovery has been achieved with current and increasing recreation in bear habitat using a variety of tools, e.g., information and education, food storage orders, increased security for bears, management of human/bear conflicts, and others (FEIS section 1.1). Decreasing human recreation in bear habitat is not necessary as an overall management strategy.

A guideline in Alternatives 2 and 2-Modified provides for localized restrictions to address conflicts with winter use activities (FEIS section 2.3). Alternatives 3 and 4 close all denning habitat to snow machine use inside the PCA during the denning period, and Alternative 4 closes all denning habitat to snow machine use outside the PCA during the denning period. Under Alternative 1, snow mobile activities in grizzly bear denning habitat would be monitored in cooperation with the IGBST and USFWS.

Forest plan revisions and amendments will address specific travel management and recreation issues as the commenter requests (FEIS section 1.5). Issues such as noxious weed mitigation measures and recreation use conflicts are outside the scope of this FEIS (sections 1.3 and 1.4).

Adequacy of analysis—recreation

350. The Forest Service should distinguish between roads and trails in the EIS.

- To provide an accurate recreation analysis
- When describing motorized access routes

351. The Forest Service should provide evidence for their statement regarding projected snow machine use on Greater Yellowstone forest lands.

352. The Forest Service should provide site specific and motorized recreation impact analysis in compliance with the three state off-road vehicle decisions.

353. The Forest Service should re-analyze the Recreational Opportunity Spectrum table and map with regard to primitiveness of land.

354. The Forest Service should compare the impacts on wildlife habitat of private residences versus those of motorized vehicle users and place restrictions on the appropriate party.

355. The Forest Service should analyze the accessibility and recreation opportunity of roads and trails.

356. The Forest Service should monitor off-road vehicle use on public lands and address its impact on grizzlies.

357. The Forest Service should use the 2003 Idaho Comprehensive Outdoor Recreation and Tourism Plan in its recreation analysis.

358. The Forest Service should use registration data provided by the Idaho Department of Parks and Recreation in its analysis of off-highway vehicle usage.

Response

Responses to Comments

Data were not available in distinguishing between motorized routes (roads and trails) within the PCA. Roughly 20 percent of the total motorized access routes on the six GYA national forests are motorized trails (Marsh et al. 2005).

Snow machine use and trends were updated using the State of Idaho snowmobile registration statistics for 2000 through 2004. This information shows that eastern Idaho snowmobile registrations increased approximately 16 percent over the five-year period. While the GYA may attract national and regional winter recreationists, the area also supports an increasing local use (FEIS section 3.9.3).

This FEIS is programmatic in nature and does not make final decisions on area or route closures. Subsequent analyses (project level NEPA evaluations) would be needed to make decisions on closures (FEIS section 1.4). The request by some comments for site-specific planning is premature.

*The ROS (Recreation Opportunity Spectrum) map in the FEIS (section 3.9.1) was updated by Forest Service and NPS recreation managers. The document, *Outdoor Recreation in the Greater Yellowstone Area: An Interagency Report* (Marsh et al. 2005) is also referenced and available for further detail (FEIS section 3.9).*

The FEIS accounts for private lands in the GYA (FEIS section 3.13.1). Within the PCA, landownership is primarily public (98 percent); private lands do not largely influence bear management. Within the GYA, private lands account for 24 percent of the area. This interface with private lands is recognized both in terms of these landowners' contributions to accommodating bear movements and presence and as a potential detriment to bears (e.g., food storage, bear habituation to humans, and bear movement) (FEIS sections 3.13.3 and 3.16).

Accessibility and impacts on the handicapped, elderly, and physically impaired will be considered when site-specific actions are proposed. This FEIS is programmatic in nature (FEIS section 1.4).

All action alternatives include monitoring of secure habitat and motorized access inside the PCA (FEIS section 1.3). This type of monitoring is consistent with the programmatic nature of this FEIS. Monitoring public compliance with access restrictions is a part of forest plan implementation and site-specific closure orders. Law enforcement and other Forest Service personnel include these site-specific restrictions as part of operational controls in forest management (FEIS sections 1.4 and 3.14).

The Idaho Statewide Comprehensive Outdoor Recreation and Tourism Plan (State of Idaho 2003) was reexamined and information was incorporated as possible (FEIS section 3.9.1). Information from the ATV registrations was also used as an indicator of use trends in the areas around the GYA (FEIS section 3.9.3).

Technical and editorial

359. The Forest Service should clarify what is meant by "motorized access routes with permanent barriers" in Alternative 2.

360. The Forest Service should adequately define the term "significant conflict" in relation to recreation user conflict.

361. The Forest Service should clearly state in Alternative 4 the intentions of motorized use designation outside the Primary Conservation Area and the related impacts.

Response

"Motorized access routes with permanent barriers" (FEIS section 2.1.2) refers to activities such as placement of earth and berms or ripping the surface of the road that create permanent closures. Gates are not considered permanent barriers. A definition was added to the list provided in section 2.1.

"Significant user conflict" and reference to motorized and non-motorized user conflicts were not identified or discussed as issues in this FEIS. The reference to "conflicts" under the issue of

Recreation Opportunities refers to grizzly bear/human conflicts (FEIS section 1.7.1) was clarified. The effects of limiting motorized access in larger areas, such as in Alternative 4, can bring about crowding and with that, the sharing among different uses can inherently bring about recreational user conflicts (FEIS section 3.9.4).

The discussion of impacts on motorized recreation in Alternative 4 were clarified to address concerns of motorized use designation outside the Primary Conservation Area and the related impacts (FEIS section 3.9.4 regarding Alternative 4).

Developed recreation

362. The Forest Service should maintain its use of the 1998 baseline in managing developed sites to allow local managers to respond to local use.

363. The Forest Service should retain developed and dispersed recreation sites.

- In order to meet public demands and adhere to multiple-use management
- To avoid forest resource damage caused by user-created recreation sites

364. The Forest Service should allow flexibility in the management of developed recreation facilities.

- To allow for maintenance and increased demand

Response

The 1998 baseline for developed site capacity would be maintained. Any proposed modifications to the baseline would require further analysis and the Application Rules would apply (FEIS sections 2.1.2 and 2.1.3). Alternatives 2 and 2-Modified do not propose direction to decrease existing recreation sites (FEIS sections 2.1.1 and 2.1.3).

Alternatives 3 and 4 could affect recreation and could lead to overcrowding or increases in dispersed sites (FEIS section 3.9.4). Alternatives 2 and 2-Modified allow some flexibility to make adjustments in developed sites given maintaining existing capacity, adherence to the Application Rules, and further analysis (FEIS sections 2.1.2 and 2.1.3).

Motorized recreation

365. The Forest Service should provide clear direction for off-road vehicle management to protect bear habitat.

- And should limit road construction and recurring helicopter flight lines

366. The Forest Service should adequately assess the effects of the proposed action on motorized recreation.

- In compliance with the Council on Environmental Quality recommendations

367. The Forest Service should establish a Motorized Access and Recreation Mitigation record bank if there are not adequate mitigation plans.

368. The Forest Service should place sign-in kiosks at the trailheads of motorized vehicle trails.

369. The Forest Service should require all motorized vehicles to display identification to help in reporting violations.

Response

Regarding the concern that the proposed action (Alternative 2) fails to constrain off-road vehicle use in the PCA, the FEIS and all action alternatives address motorized use including ATV use of trails through the management of secure habitat for bears (FEIS section 1.3). Motorized access routes include motorized trails, highways, and forest roads (FEIS section 2.1). Currently, ATV use is restricted to designated routes through current forest plan direction, with a few exceptions (FEIS section 1.1). Secure habitat for grizzly bears is also defined and omits inclusion of open or gated motorized access routes and recurring helicopter flight line (FEIS section 2.1).

Approximately 83 percent of the PCA is secure habitat and secure habitat has been evaluated for each BMU (FEIS section 3.3 and appendix A).

Responses to Comments

The impacts of alternatives on motorized recreation were considered in the FEIS (section 3.9.4). The impacts on motorized recreation were identified as a primary issue (FEIS section 1.7.1), and alternatives vary, in part, because of the potential impacts. Alternative 2 maintains the current recreation scenario within the PCA and does not propose further restrictions and reductions in motorized use as are proposed in Alternatives 3 and 4. Alternative 2- Modified extends guidance for grizzly bear management outside the PCA, but would rely upon state-defined biologically suitable and socially acceptable areas. Alternative 4 extends direction that proposes motorized route closures for more immediate preparation of future potential bear occupation (FEIS sections 2.1.2, 2.1.3, 2.1.4, and 2.1.5). For those alternatives that propose motorized route closures, additional site-specific NEPA evaluations, including public involvement, would be required (FEIS section 1.4).

Alternative 2 does not propose motorized route closures within the PCA because the secure habitat is believed to be adequate and supported the recovered population. The intent of the secure habitat standard is to maintain or increase secure habitat at or above 1998 levels. This does not preclude banking some road closures since 1998 and constructing additional roads in a subunit later as necessary. The intent of banking is not necessarily to maintain motorized access routes at the 1998 level. For Alternatives 3 and 4 that propose restricting motorized routes beyond existing levels, a mitigation bank is not considered because the intent of those alternatives is to conserve lands for the grizzly bear to the extent possible and not to mitigate motorized recreation impacts.

Sign-in kiosks could be considered by each national forest to track motorized recreation use. The purpose of this EIS and proposed action is focused on grizzly bear habitat management (FEIS section 1.4). The Forest Service is using a national visitor use monitoring survey that will provide statistically derived use levels for the national forest as a whole (FEIS section 3.9.3). This survey base has the potential of being expanded for refined surveys within a forest, but again, these efforts are outside the scope of this FEIS.

The comment suggesting that identification numbers be required to be displayed on motorized vehicles should be submitted to the state agencies that license the vehicles.

Communication and collaboration

- 370. The Forest Service should allow for proactive off-road vehicle management in cooperation with groups and individuals.
- 371. The Forest Service should clearly disclose all motorized recreation closures to ensure adequate public participation.
- 372. The Forest Service should standardize and simplify informational signs and minimize closure periods to prevent user confusion.
- 373. The Forest Service should not require motorized recreationists to participate in consensus and collaborative processes with non-motorized groups.
- 374. The Forest Service should use public service programs to direct and organize trail and mitigation work.

Response

Site-specific OHV management is the realm of each national forest and outside the scope of this FEIS (FEIS section 1.4).

Alternatives 2 and 2-Modified do not propose motorized route closures. Alternative 3 requires closures of all motorized access routes within inventoried roadless areas and additional closures in BMU subunits below 70 percent secure habitat inside the PCA; Alternative 4 requires the same closures inside and outside the PCA.

This FEIS is programmatic in nature and does not make final decisions on area or route closures. Subsequent analyses (project level NEPA evaluations) would be needed to make decisions on

closures (FEIS section 1.4). The request by some comments for site-specific planning and disclosure is premature.

The suggestion that the Forest Service standardize and simplify informational signs to prevent user confusion is outside the scope of this FEIS (FEIS section 1.4).

The public involvement process for this FEIS did not require recreationists to participate in consensus. Public involvement is described in section 1.6.

The suggestion that the Forest Service should use public service programs to direct and organize trail and mitigation work is outside the scope of this FEIS (section 1.4).

Motorized access

375. The Forest Service should allow motorized access control to be maintained at the local level.

376. The Forest Service should increase trailhead parking availability for snow machines to accommodate user loads.

377. The Forest Service should provide adequate motorized access routes near cities and towns.

- To help conserve energy

378. The Forest Service should provide adequate motorized access to dispersed campsites.

379. The Forest Service should mitigate any loss of motorized recreation acreage to prevent a net loss of motorized access.

- For snowmobile use

Response

Forest Service personnel on each forest are responsible for the implementation and management of access restrictions and closure orders at the local level. Alternatives 3 and 4 propose motorized route closures to increase grizzly bear security. The nature of this FEIS is programmatic and further site-specific evaluations and compliance with NEPA would be required (FEIS section 1.4).

The FEIS has been updated to incorporate findings from the State of Idaho 2000 Snowmobile User Survey regarding the need for more snowmobile trailhead parking in eastern Idaho (FEIS sections 3.9.3 and 3.9.4).

The suggestion that the Forest Service provide adequate motorized access routes near cities and town is outside the scope of this FEIS (FEIS section 1.4).

The suggestion that the Forest Service provide adequate motorized access to dispersed campsites is outside the scope of this FEIS (FEIS section 1.4).

Alternative 2- Modified does not propose motorized summer or winter route closures. This FEIS is programmatic in nature and does not make final decisions on area or route closures. Subsequent analyses (project level NEPA evaluations) would be needed to make decisions on closures (FEIS section 1.4). The request by some comments for site-specific planning and mitigation is premature.

Restrictions and closures

380. The Forest Service should restrict off-road vehicle access.

- For the current and future protection of denning sites
- To provide sanctuary for humans and wildlife
- To establish a national precedent

Response

The FEIS addresses motorized use including ATV use of trails through the management of secure habitat for bears (FEIS section 1.3). Motorized access routes include motorized trails, highways, and forest roads (FEIS section 2.1). Currently, ATV use is restricted to designated routes through current forest plan direction, with a few exceptions (FEIS section 1.1). Secure habitat for grizzly bears is also defined and omits inclusion of open or gated motorized access routes, recurring

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helicopter flight lines, and cross country OHV travel (FEIS section 2.1). Approximately 83 percent of the PCA is secure habitat and secure habitat has been evaluated for each BMU (FEIS section 3.3 and appendix A).

Alternatives 2 and 2-Modified have a guideline that proposes local area restrictions where winter use activities conflict with denning or bear emergence in the spring (FEIS section 2.1.2). Research has not demonstrated that winter use activities have a general, direct effect on bears. The closing of snow machine routes in denning habitat as in Alternatives 3 and 4 is not incorporated in Alternative 2-Modified.

The security inside and outside the PCA provides for large expanses of non-motorized and primitive settings that can provide sanctuary for humans and wildlife (FEIS sections 3.3, 3.9.1, and appendix A).

The FEIS was updated with clarification about the 2005 Travel Management Final Rule, which requires designation of roads, trails, and areas on National Forest System lands for motor vehicle use (FEIS section 1.5). The forest plans, as amended, are the source of management direction and guidance at the programmatic level. Site-specific restrictions and closures are developed and maintained through site-specific travel management plans and closure orders that tier to forest plans (FEIS section 1.4).

381. The Forest Service should avoid permanent area closures.

382. The Forest Service should avoid closing existing roads.

- And comply with the final Roadless Rule
- To help maintain herd numbers by allowing access for hunters
- Because of their historical and social importance
- To maintain existing opportunities for the public
- And address the need for multiple-use and recreational opportunities

Response

Historically, management of motorized use has been primarily accomplished through restriction of certain types of motorized use on established access routes, i.e., management of open motorized route densities. Recent research has shown that secure habitat (areas that are free of motorized traffic, also referred to as core areas) is an important component of grizzly bear habitat (IGBC 1998) (FEIS section 3.3.2). The maintenance of already established core grizzly bear secure areas is proposed in the PCA in all action alternatives.

The roadless rule does not direct the agency with regard to closing roads or OHV trails (FEIS section 1.5).

The management of elk herd numbers is under the jurisdiction of the state wildlife management agencies.

The social and recreational value of motorized recreation and motorized use of roads and trails was considered as an issue (alternatives varied to address these values) and the effects were disclosed (FEIS sections 1.7.1, 3.9.1, and 3.13.1).

383. The Forest Service should avoid closing existing roads and trails and should develop a network of motorized roads and trails.

384. The Forest Service should avoid closing minimally used trails because they are invaluable to motorized recreationists.

Response

Alternatives 2 and 2-Modified do not propose closing motorized routes (roads and trails), but rather focus on maintaining the core grizzly bear secure habitat that exists and has contributed to grizzly bear recovery (FEIS sections 2.1.2, 2.1.3, and 3.3.1).

385. The Forest Service should not use the Roadless Rule to close existing motorized routes in roadless areas.

Response

The roadless rule does not direct the agency with regard to closing roads or OHV trails (FEIS section 1.5).

386. The Forest Service should not restrict snowmobile recreation.

- Because it is not necessary for grizzly bear population growth

Response

Alternatives 2 and 2-Modified have a guideline that proposes local area restrictions where winter use activities conflict with denning or bear emergence in the spring (FEIS sections 2.1.2). Research has not demonstrated that winter use activities have a general, direct effect on bears. The closing of snow machine routes in denning habitat as in Alternatives 3 and 4, are not incorporated in Alternative 2- Modified.

387. The Forest Service should provide a functional network of motorized roads and trails for access and recreation to meet public needs.

Response

The suggestion that the Forest Service provide a functional network of motorized roads and trails for access and recreation is outside the scope of this FEIS (FEIS section 1.4).

388. The Forest Service should address the cumulative negative effects of motorized closures and implement relevant mitigation plans.

- With regard to recreational opportunities
- To ensure full public disclosure
- As well as implement a monitoring program operated by an unbiased third party

389. The Forest Service should evaluate the cumulative negative effects of all motorized route closures.

- On the many different kinds of users
- With regard to travel plan decisions
- By conducting an accounting of motorized closures in five-year increments since the creation of the Wilderness Act
- Through the use of best available data

Response

• *The social and recreational value of motorized recreation and motorized use of roads and trails was considered as an issue (alternatives varied to address these values) and the effects were disclosed (FEIS sections 1.7.1, 3.9.1, and 3.13.1). Alternatives 3 and 4 are the only alternatives that propose additional motorized route closures and the cumulative effects on areas outside the PCA were considered (FEIS sections 3.9.1 and 3.13.1).*

390. The Forest Service should evaluate all motorized vehicle trails for multiple recreational values.

Response

The suggestion that the Forest Service evaluate motorized vehicle trails for their recreational value, etc. is more site-specific than this programmatic FEIS (FEIS section 1.4).

391. The Forest Service should reevaluate its criteria for road closures due to motorized recreation.

Response

Road closures for grizzly bear security are based on current research (FEIS section 3.3.2).

392. The Forest Service should evaluate the effect of road and trail closures due to timber harvest on motorized access and recreation.

Response

This FEIS does not propose timber harvest and does not consider road and trail closures associated with timber harvest (FEIS section 1.4).

393. The Forest Service should designate all reasonable routes as dual use.

Response

Consideration of dual use on forest roads is outside the scope of this FEIS (FEIS section 1.4).

Hunting, shooting, and baiting

394. The Forest Service should prohibit the hunting of grizzlies.

- Because of their meager population size
- To ensure sustainable recovery of grizzly bears
- Because it is morally unjust

395. The Forest Service should protect hunting.

396. The Forest Service should address the problem of hunter-caused grizzly bear mortality.

397. The Forest Service should require that hunters be able to differentiate between grizzly bears and black bears.

398. The Forest Service should impose more stringent penalties on those who illegally hunt and kill grizzly bears.

- And should monitor outfitter camps to help change abusive practices

399. The Forest Service should collaborate with state and federal law enforcement agencies to prosecute illegal poachers.

400. The Forest Service should ensure adequate enforcement of laws to prevent illegal grizzly bear kills.

401. The Forest Service should prohibit black bear baiting.

- In the public lands of Wyoming and Idaho
- In grizzly bear habitat
- To prevent grizzly bear mortality

Response

Grizzly bears in the GYA would not be hunted until they have been removed from protection under the ESA. Grizzly bear population management, including hunting, after delisting is the responsibility of the individual state wildlife management agencies. All mortality, including any hunting, would be regulated according to the mortality limits specified in the Conservation Strategy. Those mortality limits are designed to limit mortality such that the grizzly bear population would continue to increase in size and distribution. Timing, location, and season lengths for any future grizzly bear hunting would be established by individual state wildlife management agencies through an open public process.

Grizzly bear mortality associated with ungulate hunting seasons has long been a concern of the YES of the IGBC and the associated land and game management agencies. Information and education efforts, including “Living in Bear Country Workshops,” televised public service announcements, pamphlets mailed to hunters, signs and other information at trailheads and campgrounds, news releases, and many other tools have been used to inform hunters of how to avoid conflicts with bears. The IGBC has endorsed the use of bear spray in grizzly bear/human conflict situations. Mandatory requirements for carrying bear spray have been discussed by the IGBC but dismissed for the time being pending the effectiveness of promoting voluntary use of bear spray.

Numerous pamphlets have been developed and distributed widely in cooperation with the IGBC and the YES to help users distinguish between black and grizzly bears. The “Living in Bear Country Workshops” include a section on black bear/grizzly bear identification. The State of

Montana requires all black bear hunters to take a mandatory Web-based identification test. The Wyoming Game and Fish Department has a voluntary identification test on its Web site.

All hunter-caused grizzly bear mortalities are investigated by the USFWS and the appropriate state wildlife management agency and are prosecuted according to the results of the investigation. State wildlife management agencies would continue to enforce state laws regarding the illegal killing of grizzly bears.

The Forest Service and state wildlife management agencies emphasize cooperative information and education and law enforcement efforts during hunting seasons to minimize hunter-caused grizzly bear mortalities. Forest Service hunter patrols are common practice throughout the GYA in both front and backcountry situations to ensure compliance with food storage regulations. The use of bear pepper spray is encouraged.

Black bear baiting in the GYA is controlled according to individual state regulations. Wyoming and Idaho allow black bear baiting, but it is prohibited in Montana. Regulations in Idaho and Wyoming prohibit black bear baiting inside the PCA and other areas deemed important for grizzly bears. In some areas occupied by grizzly bears in Wyoming, black bear baiting is allowed using unprocessed foods.

Impacts to grizzly bear populations from black bear baiting is one factor that would be included in the annual monitoring report by the IGBST, and could result in a Biology and Monitoring Review as directed by the Conservation Strategy.

Food storage and garbage containers

402. The Forest Service should improve and expand food storage requirements in all national forest plans.

- To reduce human-grizzly bear conflict

403. The Forest Service should enforce food storage and use regulations.

- In national forests outside the Primary Conservation Area

404. The Forest Service should educate people about storage and disposal of human and animal food items that attract bears.

405. The Forest Service should address the full range of grizzly bear behavior in its discussion of food storage management.

406. The Forest Service should require towns near grizzly bear habitat to provide bear proof garbage container.

407. The Forest Service should encourage a zero waste strategy that includes the use of compostable products.

408. The Forest Service should develop mechanisms to prevent grizzly bear habituation to garbage in local counties.

409. The Forest Service should monitor and regulate commercial outfitters.

- To reduce user degradation of public lands

Response

Food storage regulations are currently in place on National Forest System lands throughout the PCA and most places outside the PCA in areas occupied by grizzly bears. In response to the concern that the Forest Service should enforce food storage and use regulations, Alternative 2-Modified added direction and guidance for using food storage requirements and information and education to minimize grizzly bear conflicts inside the PCA and in areas determined to be biologically suitable for grizzly bear occupancy through state management plans outside the PCA.

The Forest Service does not have the authority to require food storage requirements on private lands. The IGBC and the YES are working cooperatively with the Wyoming Game and Fish Department to develop a working model for resolving grizzly bear/human conflicts in the public

land/private land interface throughout the GYA. Several private conservation organizations are providing support to this effort.

Educating national forest and national park users regarding proper behavior in bear country, including food storage requirements, use of pepper spray, and human safety considerations have been a high priority for the IGBC and associated ecosystem subcommittees. Current information and education efforts in the GYA are coordinated by a working group of the YES. The Conservation Strategy includes a chapter (chapter 6) that describes the information and education team and outlines the tasks necessary for implementation that will continue after the bear is delisted.

The IGBC, in cooperation with the Missoula Technology and Development Center of the Forest Service, has developed a protocol and equipment for testing and certifying bear resistant containers and other tools for keeping food and other attractants unavailable to bears. Recent coordinated efforts with the Forest Service, Montana Fish, Wildlife and Parks, the Grizzly Discovery Center, and the Living with Wildlife Foundation have resulted in a new protocol for evaluating the effectiveness of bear resistant dumpsters and other products primarily for use on private lands. This effort has also resulted in the development of several publications that display all the products that are available for keeping attractants unavailable to bears.

All landfills in the GYA that were frequented by bears in the past have either been closed or restructured to preclude bears from gaining food rewards. Compost sites will likely provide a similar attractant to bears as landfills do. Homeowners are discouraged from composting in areas occupied by grizzly bears.

One county commissioner from Montana, one from Wyoming, and one from Idaho represent GYA counties on the YES and the YGCC that would coordinate grizzly bear management under the Conservation Strategy. Sanitation working groups have been formed for each state that include the respective county commissioner, committee members from the state wildlife management agencies, and the Forest Service, primarily to develop programs for resolving grizzly bear/human conflicts in the private/public land interface.

All outfitters on National Forest System lands are required to have permits. Yearly activities are directed by an annual operating plan that is tiered to the permit. Permits and operating plans contain stipulations for running clean camps, proper disposal of trash, and keeping attractants unavailable to bears. It is a violation of their permits to leave trash behind or leave unauthorized caches. Some food caches are permitted during operating seasons as long as they are stored in a bear resistant manner. Outfitter permits are monitored and appropriate action taken on known violations, including cancellation of the permit.

Land management

General concerns

410. The Forest Service should avoid management plans that restrict land management flexibility.

411. The Forest Service should repeal restrictions on public land use.

412. The Forest Service should resolve the wilderness and roadless area federal designations debate.

Response

This FEIS evaluates various alternatives to meet the purpose and need for incorporating grizzly bear habitat management into forest plans. Recreation, including increasing uses, was considered as an issue and affected the development of alternatives with varying amounts of flexibility (FEIS sections 1.7.1, 2.1, and 3.9). Maintaining the conservation measures that have contributed to grizzly bear recovery is the intent of this FEIS and in addition, considers additional measures as the bear population continues to grow (FEIS sections 1.3 and 2.1). Resolving the wilderness and roadless area debate is outside the scope of this FEIS (FEIS section 1.4).

Private lands

413. The Forest Service should clarify their intentions regarding potential land acquisitions.

Response

This FEIS and the alternatives do not outline intentions for land acquisitions. There are no objectives, standards, or guidelines in any alternative related to the lands program, and no effects are expected (FEIS section 3.11). Further discussion in section 3.11 regarding land ownership adjustments recognizes that these efforts can occur, but to clarify in this response, are not a part of this FEIS and the alternatives.

Wilderness protection

414. The Forest Service should consistently implement existing access standards in wilderness areas.

- To prevent their degradation by off-road vehicles

Response

The concern about illegal motorized trespass into wilderness or within restricted areas for grizzly bear security is one that would be addressed if this amendment and associated site-specific restrictions are implemented. The budget to implement the alternatives was considered (FEIS section 3.14), but is otherwise outside the scope of this EIS (FEIS section 1.4).

Wilderness designations

415. The Forest Service should designate the Greater Yellowstone Area National Wilderness Area.

416. The Forest Service should protect roadless wildlands through wilderness designation.

- In the Shoshone and Bridger-Teton National Forests
- To maintain wildlife corridors and genetic variability
- To reduce human-grizzly bear conflict and mortality

Response

The suggestion that the Forest Service should recommend designation of the national forest areas for wilderness is outside the scope of this FEIS (FEIS section 1.4).

Roadless areas

417. The Forest Service should protect roadless areas.

- To ensure recovery of grizzly bears
- To maintain wildlife corridors and genetic variability
- For future generations
- To reduce bear-human conflict and bear mortality

418. The Forest Service should protect roadless areas from road development.

- To reduce human-caused grizzly bear mortality
- To maintain wildlife corridors
- And restore high density motorized access routes to a roadless condition

419. The Forest Service should maintain and expand roadless areas.

- To ensure grizzly bear recovery

420. The Forest Service should incorporate into its forest plan the same roadless area protections that were in effect when the Conservation Strategy and state management plans were adopted.

Response

The focus of this FEIS is to ensure the conservation of habitat to sustain the recovered Yellowstone grizzly bear population. The intent and scope of the FEIS is focused on secure

habitat for grizzly bears and not with the management and disposition of roadless areas (FEIS sections 1.2, 1.4, and 3.3.2).

Social concerns

Human population size

421. The Forest Service should address the impending problem of human overpopulation and preserve our natural resources.

Response

Managing human population growth in the GYA is beyond the scope of this FEIS and public land management of the Forest Service.

Education

422. The Forest Service should provide user education programs.

- To ensure effective restoration efforts
- Demonstrating the importance of protecting our natural environment
- To reduce human-grizzly bear conflict

423. The Forest Service should intensify hunter education programs.

424. The Forest Service should develop citizen-based educational initiatives.

- In a transboundary context

425. The Forest Service should work toward changing public views on wildlife.

- To prevent human-caused mortality of wildlife

Response

Public education regarding living and recreating in grizzly bear country is essential for public safety, grizzly security, and minimizing grizzly bear/human conflicts. Information and education programs are ongoing and will continue regardless of the outcome of this FEIS. Section 1.1 describes current education efforts. The scope of this FEIS does not deliberate changes to the information and education efforts (section 1.4).

Economic impact

426. The Forest Service should conduct a thorough analysis of the economic impacts of grizzly management decisions.

- With regard to physical safety
- With regard to recreation
- With regard to local economies
- With regard to travel and tourism industries

427. The Forest Service should provide an assessment of the economic indicators based on resident households.

- To more accurately represent local households that rely on agricultural incomes

428. The Forest Service should examine the long-term economic impact of Primary Conservation Area expansion on mining operations.

- Including the mining of phosphate ore

429. The Forest Service should acknowledge the economic value of industrial development in the United States.

430. The Forest Service should evaluate the financial advantages to wildlife protection on fishing and tourism industries.

431. The Forest Service should provide accurate comparisons of job creation in the economic portion of the EIS.

432. The Forest Service should reassess its economic evaluation of overall effects to the local populace in Section 3.14 of the EIS.

Response

Economic effects for income and employment were developed at the county level because that is the lowest level where economic data, such as income and employment, are available; community level impacts cannot be determined. Numbers simply are not available to quantitatively describe effects below the county level. Communities are recognized in section 3.13.2 and economic reliance is discussed. Physical safety or the danger the grizzly bears can pose to humans is discussed in section 3.13.2. No scientific peer-reviewed studies are available that indicate recreation and tourism would decline or increase because bears are present in an area. According to a survey of Wyoming residents conducted by the Wyoming Game and Fish Department, there is an almost equal division between Wyoming residents who think they would continue to use (48 percent) and those residents who would discontinue using (44 percent) the outdoor areas where they currently recreate in those areas occupied by grizzly bears (FEIS section 3.13.2).

The Forest Service did not assess the economic indicators based on resident households because economic dependency was best described by changes in income and employment by major industry.

In regards to phosphate leases, the Application Rules for both secure habitat and developed sites have been updated to state that “Existing oil and gas and other mineral leases would be honored” (FEIS section 2.1). For areas that are not currently leased, the expanded habitat standards and Application Rules would not preclude development, but require grizzly bear needs be considered and addressed in the prescribed manner. This would require additional mitigation and conditions to minimize effects on grizzly bears, and is likely to increase the costs of operation (FEIS section 3.12.2).

While some respondents felt protection of game species was an important economic contributor to the fishing and tourism industry and would vary with Alternative 4, there were no assumptions to indicate that game species, which are managed by the state wildlife management agencies, would change by alternative.

Providing accurate comparisons of job creation for recreation and tourism was difficult because employment from recreation and tourism, which is also an important component of the regional economy, is much more difficult to estimate, as food services, accommodations, arts, and retail trade all have employment resulting from recreation and tourism. A study available between draft and final EIS indicates comparable benefits from non-motorized recreation and motorized recreation to the economies (considered for a three-county area influenced by the Gallatin National Forest). The results indicate a contribution of less than 1 percent of the total employment in the three-county area (USDA Forest Service 2005a).