

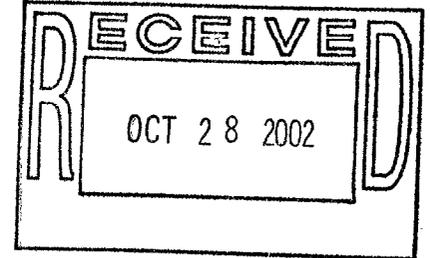


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October 24, 2002

COPY

USDA Forest Service
Attn: NFS – EMC Staff (Barbara Timberlake)
Stop Code 1104
1400 Independence Avenue, SW
Washington, D.C. 20250-1104
FAX 202-205-1012



Re: Notice of Appeal

Dear Ms. Timberlake:

The following is a Notice of Appeal filed pursuant to 36 CFR part 217.9, objecting to the Record of Decision (ROD) for the Final Environmental Impact Statement (FEIS) and Revised Land and Resource Management Plan for the Chugach National Forest (Forest Plan), signed by Regional Forester Dennis E. Bschor, on May 31, 2002. The Revised Forest Plan is based on the Preferred Alternative in the Chugach Land and Resource Management Plan Revision (FEIS), as modified in the ROD.

The Forest Plan, selected alternative, and Record of Decision fail to address and resolve several fundamental issues previously raised by scientists, resource specialists, and the public who had reviewed the plan. Furthermore, there appear to be some serious discrepancies among the FEIS, Final Plan, and ROD. These unresolved issues and discrepancies represent an unacceptable risk to the diversity and ecological integrity of the Chugach National Forest. This appeal will focus on several factors relevant to forest and wildlife conservation that were dealt with inadequately in the Final Plan.

INTEREST OF APPELLANTS

The mission of Audubon Alaska is to conserve Alaska's natural ecosystems focusing on birds, other wildlife, and their habitats for the benefit and enjoyment of current and future generations. Audubon Alaska has over 2,300 members and supporters in Alaska. The membership of the Anchorage Audubon Society is about 1,200 and also represents the Kenai Peninsula. Audubon has a strong interest in the conservation and management of the Chugach National Forest. Many National Audubon members have visited the Chugach and many of our Alaska members use the forest regularly for hiking, birding, fishing, and hunting. Audubon has a long history of interest regarding conservation issues on the Chugach Forest. Audubon Alaska and the Anchorage Audubon Society participated collaboratively in the Chugach Land Management Plan Revision. We focused our efforts primarily on wildlife conservation issues and the importance of

providing a diversity of wilderness (category 1) designations across the forest. Audubon also placed specific emphasis on conservation strategies for protecting the Kenai population of brown bears.

Audubon appreciates the progress the Forest Service has made toward a more balanced, ecosystem approach to management of the Chugach National Forest. The Decision and Rationale section of the Record of Decision (ROD) stated that the Forest Service consistently heard from the public an overwhelming desire to keep the forest as it is today - wild in character, and sustaining the ecosystems and human uses of the forest. The ROD also stated that the management goals for the forest are to sustain both the human uses and enjoyment of forest resources and the wild character of the Chugach. Audubon considers this statement a positive approach and one that is consistent with the years of work invested in the planning process for the Chugach National Forest.

Although the goals and objectives in the draft and final versions of the Revised Forest Plan are essentially the same, there are significant changes in some prescriptions and standards and guidelines. We question whether the changes incorporated in the Final Plan have received adequate technical review regarding environmental effects and whether these effects are consistent with the Final Plan's goals and objectives. To our knowledge, there was not an opportunity for public comment on some significant policy shifts embodied in these revisions. While the revised Final Plan is an improvement over the old Forest Plan, we believe there are still serious deficiencies that must be corrected. Our concerns are outlined below.

KENAI BROWN BEARS

Brown bears on the Kenai Peninsula are listed by the State of Alaska as a Population of Special Concern. This listing was made because the population is vulnerable to a significant decline due to low numbers, restricted distribution, dependence on limited habitat resources, or sensitivity to environmental disturbance (Alaska Department of Fish and Game 2000). The Forest Service identified brown bears as a Management Indicator Species (MIS) for the Chugach Forest (USDA Forest Service 2002a). One of the goals of the Final Plan is to maintain brown bear on the Kenai Peninsula portion of the Chugach National Forest (USDA Forest Service 2002b). The Final Plan includes a prescription called Brown Bear Core Area Management Area (Brown Bear Core). Brown Bear Core was "designed to manage selected landscapes and their associated habitats to meet population objectives for brown bears and to reduce dangerous encounters between humans and brown bears." (USDA Forest Service 2000b: p. 4-54). The Brown Bear Core prescription was applied to backcountry areas of the Kenai portion of the Chugach National Forest that are considered important habitat where people and bears should be separated.

Brown Bear Core Prescription: There is a serious error regarding the Brown Bear Core prescription in the Final Plan. The Final Plan appears to have been changed late in the

process (without a new environmental impact analysis) to allow for utility systems to be constructed within Brown Bear Core (see prescription matrix in USDA Forest Service 2002b: F1). The FEIS, however, analyzed a different prescription for Brown Bear Core than is described in the Record of Decision and Final Plan. For example, to help maintain brown bear viability on the Chugach, the FEIS analyzed a prescription specific for brown bears that “limits human-bear interactions and prohibits Forest Service road construction and utility corridors.” (USDA Forest Service 2002a: 3-235) Unfortunately, this issue is further confused because the prescription matrix in the FEIS lists utility systems as a “conditional” use under the Brown Bear Core prescription (USDA Forest Service 2002a: J-1). This serious discrepancy in analysis clearly invalidates the findings of the ROD and Final Plan regarding Brown Bear Core.

Originally, the Draft Environmental Impacts Statement (DEIS) for the Chugach National Forest Land Management Plan Revision had listed utility systems as a conditional use within the Brown Bear Core prescription (USDA Forest Service 2000). Audubon, the U.S. Fish and Wildlife Service, and brown bear experts strongly objected to conditionally allowing utility corridors within this prescription because it would have significantly diminished the value of Brown Bear Core areas. We believed that the conditional allowance of utility systems was to be changed in the Final Plan to no utility systems in Brown Bear Core. Such a change would have been in response to the overwhelming scientific evidence of the incompatibility of roads and utility corridors in important brown bear habitats as referenced in the text of the FEIS.

The Brown Bear Core areas designated in the Final Plan represent important brown bear refugia and habitat linkages where human-bear interactions should be minimized. For example, the Russian River represents a shared 18-mile boundary between the Chugach National Forest and the Kenai National Wildlife Refuge. According to the U.S. Fish and Wildlife Service (2000: p. 17), this area is “extremely important to Kenai Peninsula brown bears feeding on salmon carcasses along the Russian River, Lower and Upper Russian Lakes, Goat Creek and unnamed creeks within the Chugach National Forest at the southern end of the Upper Russian Lake.” Salmon represent a critical food for brown bears on the Kenai Peninsula (Hilderbrand et al. 1999, IBBST 2002). If a utility corridor was put into this area, it would likely increase human use substantially. Even if motorized use was restricted (which is difficult to do with ATVs and snowmachines), the increased access for foot traffic would likely elevate mortality levels on brown bears in this important area.

Brown Bear Standards and Guidelines: The FEIS outlines a revised Forest Plan standard and guideline to provide 750-foot buffers along anadromous fish streams to provide screened foraging habitat for bears and to manage human activity to minimize encounters in all alternatives. The ROD states that the Brown Bear Core plus the brown bear habitat management standards “specifically limits human-bear interactions by prescribing a 750 ft buffer to provide cover for brown bears while feeding on key anadromous fish streams, combined with the forestwide standard to limit the

attractiveness of garbage and food to bears will help maintain brown bear viability on the forest under the Revised Forest Plan.” (USDA Forest Service 2000c: p. 39) The ROD (p. 39) also states, “The Revised Forest Plan is consistent with the recommendations of the Interagency Brown Bear Study Team conservation assessment.” However, the IBBST (2001) stated that, “The standards and guidelines recommended for riparian buffers are *not* based on data of Kenai Peninsula brown bear movements.” Based on 28,000 locations of 28 bears, the average distance of female brown bears from anadromous salmon streams on the Kenai was about 2,000 m (6,560 ft) (IBBST 2001). These data demonstrate that buffers only a few hundred meters will only include a small portion of the habitat used by salmon-feeding bears (IBBST 2002).

The U.S. Fish and Wildlife Service (2000) stated, “We believe the Standards for Bear Habitat Management for the CNF-wide application are inadequate... The 750-foot buffer zone proposed in the Forest Plan is not sufficient to provide cover for brown bears while feeding, or between brown bears and humans.” Clearly, the Brown Bear Core and stream buffers are not adequate to provide the assurance that the Kenai brown bear population will remain viable on the forest over the next several decades to 100 years.

Recreation: The maximum recreational opportunity spectrum (ROS) class for the Brown Bear Core prescription was also changed between the DEIS and the FEIS and Final Plan. It went from semiprimitive nonmotorized to roaded natural. There was no public discussion about this and we are unaware that there was any dialogue with bear experts. However, this change has a significant probability of impacting bears and placing them at greater risk of detrimental human interactions as a result of increased human access into backcountry settings. This change in the prescription is not compatible with minimizing negative bear-human impacts leading to increased bear mortality (ie. maintaining refugia for brown bears).

General Conservation Concerns for Kenai Brown Bears: The Chugach National Forest has an important responsibility for managing its lands in a way that will help maintain a viable population of brown bears on the forest and on the Kenai Peninsula as a whole. The Forest Service has acknowledged that “the Kenai Peninsula brown bear population meets the criteria used to classify the grizzly bear in the lower 48 as threatened, although its isolation from other populations is uncertain.” (USDA Forest Service 2000: 3-192) The State Of Alaska has also identified Kenai brown bears as a population of special concern (Alaska Department of Fish and Game 2000).

The brown bear population on the Kenai Peninsula is estimated at 250-300 bears (Alaska Department of Fish and Game 2000). This small population is geographically isolated from the rest of Alaska. This "island" population is not unlike that in Yellowstone in the lower 48 where grizzlies have been close to the brink of extirpation for decades. Although the Kenai is about 9,000 square miles in size, brown bears are regularly distributed on less than half the area. The Kenai Peninsula is connected to the Alaska mainland by a narrow 9 mile-wide isthmus between Cook Inlet and Prince William Sound. This narrow corridor and human developments there likely restrict movements of

bears between the Kenai and mainland Alaska. A cumulative effects model developed for the Chugach Forest portion of the Kenai Peninsula estimated that habitat effectiveness for brown bears has already been reduced by approximately 70% due to human activities (Suring et al. 1998).

Brown bears have very low reproductive rates (Bunnell and Tait 1981). For example, most females generally don't breed until they are 5 or 6 years old, their average litter is about 2 cubs, the interval between litters is 3 to 4 years, and 30-60% of the cubs may die during their first year. Consequently, brown bear populations cannot sustain high mortality pressures. In the lower 48 states, for example, human encroachment and increased bear mortality has led to the extirpation of the grizzly over 95% of its former range (Servheen 1990). Today, the grizzly is listed as a threatened species in the lower 48 states.

Expanding human activities across the Kenai, particularly in lowlands near salmon streams, will increase bear-human contact inevitably resulting in the direct mortality of bears through legal hunting, defense of life and property (DLP) kills, and illegal killing. The increasing DLP kill on the Kenai raises significant questions about maintaining a viable brown bear population on the peninsula (Schwartz and Arthur 1997). We have seen a doubling of the DLP kill on the Kenai over the last decade and 70% were killed in rural sites (Suring and Del Frate in press). DLP kills on the Kenai were associated most closely with increasing density of roads and trails (Suring and Del Frate in press). In 2002, at least 14 brown bear mortalities have been recorded even though hunting has been closed by emergency order (J. Selinger, ADF&G, Soldotna, AK, personal communication 2002). Nine of those mortalities were DLPs and four were killed by collisions with cars. DLP killing of brown bears pose a significant risk to Kenai brown bears (Interagency Brown Bear Study Team 2001).

The Kenai Peninsula is one of Alaska's most developed and fastest growing regions. For example, the human population has increased from about 9,000 in 1960 to almost 50,000 in 2000 (Camp 2001). Connected by road to the largest city in Alaska, the Kenai is the focal area for many of the state's outdoor recreationists and an important visitor destination for a growing tourism industry. Outdoor recreation, sport hunting and fishing, logging, mining, oil and gas development, land subdivision, and other developments are increasing throughout the Kenai Peninsula. The spruce bark beetle infestation and the call for extensive salvage logging (and road construction) further exacerbate these developments. When human access to important bear habitat increases, the likelihood of increasing bear mortality also increases (Herrero 1985, McLellan et al. 1999, Suring and Del Frate in press). All these activities increase opportunities for bear-human encounters and their cumulative impacts are of particular concern to wildlife managers in Alaska.

Roads and habitat fragmentation (breaking habitats into smaller more isolated blocks) represent the most significant threats to the conservation of bears because they increase human access and bear mortality (Schoen 1990). The construction of roads into brown

bear habitat has been demonstrated to impact bear populations by increasing human access which results in the direct mortality of bears through legal hunting, defense of life and property kills, illegal killing, and fragmenting the habitat into smaller, more isolated parcels (Knight 1980, Peek et al. 1987, McLellan and Shackleton 1989, Mattson 1990, Schoen et al. 1994, Suring et al. 1998, Titus and Beier 1991, Mace et al. 1996).

In Yellowstone Park, grizzly bears avoided areas within 500 m of roads (Mattson et al. 1987). Kasworm and Manley (1990) documented an 80% decline in grizzly bear habitat use within 1 km of roads open to motorized vehicles in Montana. Mace and Waller (1998) also documented bear avoidance of roads. McLellan (1989) documented that eight of nine radio-collared bear mortalities occurred during resource extraction activities. Mattson et al. (1992) reported that Yellowstone grizzlies that were habituated to people were killed three times more than non-habituated bears. Titus and Beier (1991) demonstrated a significant correlation between cumulative miles of road construction and increased bear mortality on northeastern Chichagof Island in southeastern Alaska. Even after closure of hunting seasons, mortality continued on Chichagof Island with defense of life and property kills and an unknown (but perhaps substantial number) of illegal kills (Schoen et al. 1994).

Brown bear habitat on the Kenai Peninsula is already significantly fragmented. For example, on the northern portion of the peninsula, including and to the west of the Chugach National Forest, there are at least nine major corridors fragmenting bear habitat. These include the Alaska Railroad, Seward Highway, Sterling Highway, Johnson Trail, Resurrection Trail, Russian River Trail, Quartz Creek Transmission Line, Enstar pipeline, and Tesoro pipeline. This is to say nothing of the Russian River, Quartz Creek, and Primrose campgrounds, Russian River Ferry, and Kenai Refuge campgrounds. Maintaining a few backcountry refugia for brown bears may mean the difference between sustaining a viable population versus watching it decline toward an endangered species listing. The major impetus for the Kenai Brown Bear Conservation Strategy was to prevent the need for an endangered species listing. It seems inconceivable that the Final Plan for the Chugach National Forest would not take this same proactive approach to conservation of a large carnivore population at risk.

Alaska's Kenai Peninsula is clearly showing signs of ecosystem stress and the brown bear is a key indicator of that stress (Schoen 1999). As communities on the Kenai Peninsula continue to expand, many of the important forested connections will be affected or lost (USDA Forest Service 2002a). The cumulative effects of increased development, recreation, tourism, and use of the Kenai Peninsula would affect all wildlife, and large carnivores, including wolf, lynx, and brown bear, would be most affected. It is important for resource agencies, like the Chugach National Forest, to address the long-term cumulative effects of expanding development on the Kenai Peninsula now, before there are irreversible declines in some wildlife populations. If the brown bear population of the Chugach National Forest became depleted, it would have ripple effects throughout the entire Kenai Peninsula (USDA Forest Service 2002a).

In 1999, the Alaska Department of Fish and Game coordinated a stakeholder process to address concerns about Kenai brown bears and develop and Kenai Brown Bear Conservation Strategy (Alaska Department of Fish and Game 2000). That strategy represented the first effort to develop a proactive management plan for Kenai brown bears. The Chugach Forest Plan also provides an opportunity to address cumulative effects of growing human populations and resource development on bears. It is unclear, however, what kind of cumulative effects analysis was conducted on Kenai brown bears. This should be further clarified.

The Brown Bear Core prescription was designed to minimize human-bear interactions and bear mortality in important bear habitats. However, the Brown Bear Core prescription has been changed to allow utility corridors to penetrate these important brown bear refugia. This change has the potential for significantly increasing human access and inevitably increasing bear mortality. The entire concept of a Brown Bear Core prescription has been invalidated by this 11th hour action that was done without public comment or interagency review. Because of this action, the conservation strategy for maintaining viable brown bear populations on the Kenai Peninsula portion of the Chugach Forest is seriously flawed. Based on the recent trends in brown bear mortality on the peninsula, the long-term prognosis for conservation of brown bears is in doubt. The Chugach National Forest must revisit this issue and correct this serious problem in their Final Plan.

WILDERNESS REPRESENTATION ACROSS THE FOREST

The distribution of Recommended Wilderness and other category 1 prescriptions in the Preferred Alternative is not well represented across a range of ecosystems on the Chugach Forest. In fact, about 65% of Recommended Wilderness in the DEIS Preferred Alternative was rock and ice, a land cover that makes up only 14% of the Chugach National Forest. Although the areas designated as Recommended Wilderness are very scenic, their biological productivity is low and they do not adequately represent areas of high-quality fish and wildlife habitat. Audubon recommends that the Forest Service provide a more representative distribution of category 1 prescriptions across the forest. Recommended Wilderness, or category 1 prescriptions, should be distributed on the Copper River Delta, at least one large island in Prince William Sound, and some portion of the Kenai Peninsula. In fact, since Brown Bear Core does not accomplish its original purpose, a logical area for Recommended Wilderness would be the Russian River – Resurrection River area.

The Chugach Forest borders other land management jurisdictions including the Kenai National Wildlife Refuge, Kenai Fjords National Park, Chugach State Park, and Wrangell-Saint Elias National Park. In many cases, the forest boundaries are adjacent to designated wilderness areas. The Forest Plan did not adequately recognize the importance of interagency coordination in managing adjacent lands. Clearly, agency boundaries are meaningless to wide-ranging species like large carnivores (e.g., wolves, brown bears, wolverines). In fact, our ability to maintain viable populations of these

species, particularly in an isolated area like the Kenai Peninsula, will depend on compatible land management strategies. Audubon Alaska recommends that the Forest Service explicitly address the importance of ecosystem management and interagency coordination and reconsider Recommended Wilderness, or other compatible category 1 designations, for Chugach Forest lands that border other wilderness lands, particularly the Kenai National Wildlife Refuge and Wrangell-Saint Elias National Park.

CUMULATIVE EFFECTS

The FEIS is confusing about its cumulative effects analysis. The FEIS states, "the cumulative effects are similar in all alternatives." (USDA Forest Service 2002a: p. 3-272) How can the cumulative effects be the same for Alternative A (the development alternative, which includes 0% category 1 prescription and 60% category 3-4 prescriptions) and Alternative F (the wilderness alternative which includes 80% category 1 prescription and 0% category 3-5 prescription)? This doesn't make sense and suggests that the cumulative effects analysis lacks sensitivity. This issue must be clarified and consideration given to conducting a new cumulative effects analysis.

FISH AND WILDLIFE CONSERVATION AREA

The Fish and Wildlife Conservation Management Area prescription appears to have some discrepancies between the management intent and the standards and guidelines. For example, both the draft and final prescription allow nonchargeable (non-ASQ) commercial timber harvesting as a "conditional" activity. The draft Plan includes a standard for Forest Products, which is:

1. Managed stands shall have an extended rotation period: 170-200 years.

The final Forest Plan deleted any standards or guidelines for Forest Products. Including this activity as conditional but without any standards or guidelines could be creating a loophole that allows a level of timber harvesting exceeding that which would have originally been expected under the draft plan. While we agree that in some circumstances, properly managed commercial timber harvesting could benefit some wildlife populations (e.g., moose), removing the extended rotation period removes any constraint to the amount of timber harvesting that might occur. If nonchargeable commercial timber harvesting is to be conditional, it is essential that these conditions be explicit and not left up to some vague interpretation about what does or does not comply with the prescriptions theme and management intent.

The final Plan adds a guideline under Recreation, which is:

4. Develop campgrounds in areas conducive to concentrated use in a manner that avoids detracting from fish and wildlife values.

We consider this added guideline inappropriate. It commingles this prescription with the Fish, Wildlife and Recreation Management Area prescription, which is oriented towards

managing wildlife in order to accommodate various consumptive and nonconsumptive user groups.

In both the proposed and Final Plan, the Fish and Wildlife Conservation prescription states that building new roads by others is considered "conditional." But there are significant differences in the Access and Transportation guidelines. The guidelines in the Draft Plan state:

1. Motorized access may be restricted to protect fish and wildlife habitat.
2. Marine transfer facilities are discouraged but may be constructed consistent with meeting fish and wildlife objectives.
3. Construction of new roads, as well as facilities associated with roads (such as boat docks, powerlines, pipelines, and parking lots) is discouraged, but may be constructed consistent with meeting fish and wildlife objectives.

The guidelines in the Final Plan state only:

1. Marine transfer facilities are discouraged but may be constructed consistent with meeting fish and wildlife objectives.

Once again, allowing an activity as "conditional", but then not stating the conditions is equivalent to giving the activity a "yes." It appears to us that the criteria for deciding on new roads through areas with a Fish and Wildlife Conservation prescription will not be driven by the theme, management intent, standards, or guideline for this prescription, but by some other, unrelated prescription, such as Major Transportation/Utility Systems. We see this as a major policy shift. The general tone of the Major Transportation/Utility Systems is not to decide whether the proposed road is "consistent with meeting fish and wildlife objectives," but on mitigation of impacts.

How to decide on proposed new roads through Chugach National Forest lands that have a Fish and Wildlife Conservation prescription is not a theoretical consideration. For example, the Alaska Department of Transportation and Public Facilities has been advocating a new road around the community of Cooper Landing. Their preference has been the Juneau Creek alternative, despite considerable controversy and potential impacts to wildlife, particularly brown bears. Construction of the Juneau Creek alternative would traverse Chugach National Forest land that has been prescribed as Fish and Wildlife Conservation. This subtle shift in policy by the Chugach National Forest establishes a permissive approach for a project that could impact wildlife and wilderness recreation on the forest. To our knowledge, this policy change occurred without any explicit recognition of environmental effects or public input regarding the proposed road.

SUMMARY

Audubon believes the ROD and the Final Plan did not adequately address some significant issues raised by scientists, the conservation community, and the public. Furthermore, we believe there are significant errors in the analysis of effects that invalidate portions of the Final Plan. While the revised Final Plan is an improvement over the old Forest Plan, we believe there are still serious deficiencies that must be corrected.

Audubon requests that the Forest Service modify the Brown Bear Core prescription to not allow utility systems. If this change is not made the intent of the Brown Bear Core will be invalidated and the prescription for those areas (now identified as Brown Bear Core) should be changed to Recommended Wilderness, Backcountry, or another more appropriate prescription. The recreational opportunity spectrum should also be changed back to semiprimitive nonmotorized as in the DEIS. In addition, the Standard 750 ft buffer should be expanded in consultation with brown bear specialists.

Audubon strongly urges the Forest Service to expand the Recommended Wilderness or other category 1 prescriptions to encompass a greater diversity of geographic areas and ecological conditions across the Chugach Forest. The Copper River Delta and Kenai Peninsula must have greater representation in category 1 prescriptions.

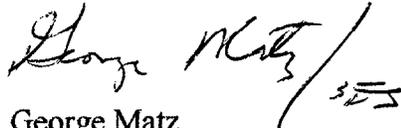
Audubon is concerned about the Final Plan's cumulative effects analysis. This issue must be clarified and consideration given to conducting a new cumulative effects analysis.

Finally, Audubon requests the Forest Service maintain the standards and guidelines language in the DEIS for the Fish and Wildlife Conservation Area prescription.

Sincerely:



Stanley Senner
Executive Director
Audubon Alaska



George Matz
President
Anchorage Audubon Society

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