Recovery policy, the Endangered Species Act and the Yellowstone grizzly bear (Ursus arctos horribilis): A case study analysis of the role and function of environmental organizations

Rachel A. Platt

University of New Hampshire, Durham

Follow this and additional works at: https://scholars.unh.edu/thesis

Recommended Citation


https://scholars.unh.edu/thesis/80

This Thesis is brought to you for free and open access by the Student Scholarship at University of New Hampshire Scholars' Repository. It has been accepted for inclusion in Master's Theses and Capstones by an authorized administrator of University of New Hampshire Scholars' Repository. For more information, please contact nicole.hentz@unh.edu.
Recovery policy, the Endangered Species Act and the Yellowstone grizzly bear (Ursus arctos horribilis): A case study analysis of the role and function of environmental organizations

Abstract
This Thesis explores the question, "what are the politics of de-listing an endangered species?" The Yellowstone grizzly de-listing process offered environmental organizations a platform to provide the general public with a genuine opportunity to engage with the comments and positions, to the federal government. It contends that a symbolic consensus has been constructed about the American West, Yellowstone National Park and the grizzly bear and these constructed were strong enough to generate the majority of edited responses to the Fish and Wildlife Service during the de-listing process. This thesis looks at the manner in which environmental organizations employ this natural heritage and used it to generate public response against the de-listing process. Finally, this thesis fleshes out three emerging themes that environmental organizations use to generate response: the role of trust in transitioning oversight from the federal to state government, the role of scientific knowledge, and the role of values.

Keywords
Political Science, General, History, United States, Agriculture, Forestry and Wildlife

This thesis is available at University of New Hampshire Scholars' Repository: https://scholars.unh.edu/thesis/80
RECOVERY POLICY, THE ENDANGERED SPECIES ACT AND THE
YELLOWSTONE GRIZZLY BEAR (*Ursus arctos horribilis*):
A CASE STUDY ANALYSIS OF THE ROLE AND FUNCTION OF
ENVIRONMENTAL ORGANIZATIONS

BY

RACHEL A. PLATT

Baccalaureate of Arts, Washington State University, 2005

THESIS

Submitted to the University of New Hampshire
in Partial Fulfillment of
the Requirements for the Degree of

Master of Arts
in
Political Science

May, 2008
This thesis has been examined and approved.

Jeanie Sowers,
Thesis Director, Jeanie Sowers,
Assistant Professor of Political Science

Roslyn Chavda,
Assistant Professor of Political Science

Andrew Rosenberg,
Professor of Natural Resources Policy and Management

5/14/08
Date
DEDICATION

For my grandma Lucy, who forged my lifelong love of the grizzly bear by never saying "no" to a trip to the zoo. This thesis is dedicated to you, and the countless hours you played, "Where in the Zoo is Carmen San Diego?" with me as a child.
ACKNOWLEDGEMENTS

There are several individuals, who without their help, this thesis would have never come into fruition. First, I would like to thank my thesis committee Dr. Jeanie Sowers, for your never-ending patience and motivation to achieve my end results. Thank you to, Dr. Roslyn Chavda for your insight and Dr. Andrew Rosenberg for your time and constant drive to push my results further.

Thank you to the wonderful staff in the Political Science department.

I am also indebted to my classmates, cadre and professors whose conversations, questions and proof-reading all helped to shape where my thesis is today.

Thank you, most of all to my mother and father. Your never ending support has helped to guide me throughout each challenge that has come my way. Without your guidance and support, none of what I have achieved would have been possible.
# TABLE OF CONTENTS

DEDICATION .................................................................................................................. iii

ACKNOWLEDGEMENTS ................................................................................................. vi

LIST OF TABLES .............................................................................................................. vii

LIST OF FIGURES ........................................................................................................... viii

ABSTRACT ......................................................................................................................... ix

CHAPTER .......................................................... PAGE

1. SYMBOLIC CONSENSUS, NGOS AND SPECIES PRESERVATION IN THE GREATER YELLOWSTONE ECOSYSTEM ............................................................. 1

   Introduction .................................................................................................................. 1
   Research Question ...................................................................................................... 5
   Contribution and Purpose .......................................................................................... 6
   Research Methods ....................................................................................................... 6
   Outline of Thesis Chapters .......................................................................................... 7
   Approach ...................................................................................................................... 8
   Conclusion ................................................................................................................... 9

2. A HISTORICAL CONTEXT OF GRIZZLY MANAGEMENT IN YELLOWSTONE NATIONAL PARK ............................................................... 11

   Introduction .................................................................................................................. 11
   The Wilderness Act .................................................................................................... 11
   The Evolution of the American West ......................................................................... 13
   The Endangered Species Act ..................................................................................... 16
   Historical Wilderness Themes and Values ................................................................ 19
   Yellowstone’s Role in Protecting the Grizzly ............................................................ 21
   Environmental Organizations, the ESA and the Yellowstone Grizzly ...................... 24

3. IS THE PUBLIC BEING HEARD?: ANALYSIS OF PUBLIC COMMENT IN THE YELLOWSTONE DELISTING PROCESS ........................................... 27

   Introduction .................................................................................................................. 27
   Public Involvement during the Yellowstone Grizzly De-listing Process .................... 28
   Demographic Summary of Respondents .................................................................... 30
Analysis of Form Letter Response Type........................................32
NGOs Demonstrate Ability to Overcome Obstacles to Public
Participation.............................................................................34
The Role of Trust......................................................................35
The Role of Science...................................................................39
The Role of Values...................................................................42

4. SUMMARY OF THE USE OF SCIENCE, VALUES, TRUST AND HUMAN
VALUES BY ENVIRONMENTAL ORGANIZATIONS DURING THE
YELLOWSTONE GRIZZLY CASE STUDY........................................45

Implications of Public Comment and Environmental Organizations......45
Conclusion................................................................................46

REFERENCES.............................................................................48

APPENDICE................................................................................51

APPENDIX A: INSTITUIONAL REVIEW BOARD APPROVAL...................52
<table>
<thead>
<tr>
<th>TABLE</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Table 1-1: Response Type to the Fish and Wildlife Service</td>
<td>5</td>
</tr>
<tr>
<td>Table 2-1: Documented Last Grizzlies Sighted and Location</td>
<td>22</td>
</tr>
<tr>
<td>Table 3-1: Benchmarks of the Grizzly De-listing Public Comment Process</td>
<td>30</td>
</tr>
<tr>
<td>Table 3-2: Demographic Breakdown of Respondents</td>
<td>31</td>
</tr>
<tr>
<td>Table 3-3: Response Type</td>
<td>32</td>
</tr>
<tr>
<td>Table 3-4: Breakdown of NGOs Stance on Grizzly De-listing</td>
<td>33</td>
</tr>
<tr>
<td>Table 3-5: Sierra Club Mission Statement</td>
<td>37</td>
</tr>
<tr>
<td>FIGURE</td>
<td>PAGE</td>
</tr>
<tr>
<td>--------</td>
<td>------</td>
</tr>
<tr>
<td>Figure 1-1: Greater Yellowstone Ecosystem and Yellowstone National Park</td>
<td>3</td>
</tr>
</tbody>
</table>
ABSTRACT

RECOVERY POLICY. THE ENDANGERED SPECIES ACT AND THE YELLOWSTONE GRIZZLY BEAR (*Ursus arctos horribilis*):
A CASE STUDY ANALYSIS OF THE ROLE AND FUNCTION OF ENVIRONMENTAL ORGANIZATIONS

by

Rachel A. Platt

University of New Hampshire, May, 2008

This thesis explores the question, “what are the politics of de-listing an endangered species?” The Yellowstone grizzly de-listing process offered environmental organizations a platform to provide the general public with a genuine opportunity to engage with the comments and positions to the federal government. It contends that a symbolic consensus has been constructed about the American West, Yellowstone National Park and the grizzly bear and these constructs were strong enough to generate the majority of edited responses to the Fish and Wildlife Service during the de-listing process. This thesis looks at the manner in which environmental organizations employ this natural heritage and used it to generate public response against the de-listing process. Finally, this thesis fleshes out three emerging themes that environmental organizations use to generate response: the role of trust in transitioning oversight from the federal to state government, the role of scientific knowledge, and the role of values.
CHAPTER 1

SYMBOLIC CONSENSUS, NGO'S AND SPECIES PRESERVATION IN THE GREATER YELLOWSTONE ECOSYSTEM

Introduction

A literal translation of wilderness is a "place of wild beasts," (Nash, 1970) but what wild beasts? The presence of the grizzly bear, its natural distribution, and its abundance directly reflects the wilderness conditions of Yellowstone National Park. It can be asserted that the presence of certain wildlife are recognizable symbols of particular pockets of wilderness. Yellowstone National Park is grizzly country. Without Yellowstone National Park, the grizzly would not have been afforded the ability to survive and sustain its numbers within the confines of the Greater Yellowstone Ecosystem. Yellowstone without the grizzly and the grizzly without the freedom that Yellowstone National Park provides are virtually unthinkable. However, the grizzly bear is only one component of the stewardship scheme.

Federal agencies are required by the National Environmental Policy Act to seek and consider public comments on proposed actions affecting public land. However, federal agencies are not required to alter or abandon proposals based on a majority view. For example whether a majority of comments on a project raise concerns, the agency can still proceed, given it thoroughly analyzes the full range of impacts, provides an opportunity for public input and explains the rationale for the decision. The Yellowstone grizzly case demonstrates an example where decision makers were provided with a
majority of public comment in opposition, but ruled to continue with the de-listing process of the Yellowstone grizzly bear in the Greater Yellowstone Ecosystem. The actual action of de-listing a species is the final step of the Endangered Species Act and is done when the species has been labeled as having a sustainable population in its habitat by the Fish and Wildlife Service.

With the American western expansion, grizzlies and other predators were consciously exterminated (Dunlap, 1998). The Endangered Species Act of 1973 later provided a grounds to protect the North American grizzly and offered a means to restore their historic habitat. By including the phrase, “significant portion of its range” Congress declared its intent that a listed species would not only be saved from extinction but went a step further requiring a species be recovered prior to its removal from the Act. Currently, the main population centers for grizzlies in the lower 48 states are the Greater Yellowstone Ecosystem and the Northern Continental Divide Ecosystem.

The former area is centered around Yellowstone National Park and includes about 18 million acres of national parks, national forests, national wildlife refuges, and private land (Figure 1-1). Park officials believe that between 400 and 600 bears currently reside in the Greater Yellowstone Ecosystem.¹ In 2007, the Department of Interior ruled to designate the Greater Yellowstone Ecosystem population of grizzly bears as a distinct population segment and removed the Yellowstone grizzly from the federal list of

endangered and threatened wildlife. The Department of Interior built on the success of reproduction and mortality rates within the Greater Yellowstone while it downplayed the lack of grizzly presence currently in much of its historic range across the western United States.

Figure 1-1: Greater Yellowstone Ecosystem and Yellowstone National Park

Individuals and the US government have become increasingly aware that healthy ecosystems are essential to human survival. In turn, the influence of environmental organizations on federal policy has increased. This thesis will focus on the recent removal of the grizzly bear from the Endangered Species Act within the Greater Yellowstone Ecosystem. The Yellowstone grizzly poses an interesting case to analyze.

---

the role environmental organizations have in motivating the general public to participate in the political process.

The Yellowstone grizzly ruling was not the first time that the Department of Interior faced criticisms from the American public, rallied together by notable environmental organizations like the Sierra Club, National Resource Defense Council, and Earth Justice. Among such examples include the signed agreement between Secretary of the Interior Bruce Babbitt and Governor Roy Romer of Colorado of 2005, allowing Colorado to develop and implement its own plans to protect endangered and threatened species throughout the state, by implementing voluntary compliance from private property owners, municipalities and Indian Nations under Section 6 of the Endangered Species Act ("New Ways to Save Species: Plan to Save Threatened Wildlife Could Become U.S. Model Officials Say," 1995) Other cases include the Northern Spotted Owl in the Pacific Northwest (Noon, B., & Blakesley, J., 2006) and the Delta Smelt in southern California ("The Overcrowded Ark," 2007).

This thesis assesses the growing awareness of environmental preservation and the prospects for taking substantive action to protect species using the Yellowstone grizzly bear example. As Aldo Leopold wrote in A Sand County Almanac, "Permanent grizzly ranges and permanent wilderness areas are, of course, two names for one problem. Enthusiasm about either requires a long view of conservation, and a historical perspective."

The Yellowstone grizzly bear is a keystone species of the Greater Yellowstone Ecosystem as well as Yellowstone National Park. Consequences run up and down the proverbial ladder linking together other species within the ecosystem and reverberating
within the Park itself. Throughout the de-listing process examples of sprawling rural
development, oil and gas drilling, logging, road building, and off-road vehicle use were
pointed to have narrowed grizzly bear habitat in the lands surrounding the Greater
Yellowstone Ecosystem. These activities were overwhelmingly noted by scientists and
NGOs to continue to close in on the last few fragments of Yellowstone grizzly country.
Slow reproduction rates, high human-caused mortality rates and threatened food sources
also pose problems for the long-term survival of the bears.

This study seeks to understand the politics of species preservation by analyzing
how environmental NGOs draw on long-standing myths about the American West and
contributes to a symbolic consensus about policy choices on the Endangered Species Act.
Environmental organizations played a key role in the Yellowstone grizzly case
accounting, for 182,223 of the 193,578 (see Table 1-1) public comments received to the
Fish and Wildlife Service. For this reason, a close examination of the role of
environmental organizations, including the Sierra Club, Natural Resource Defense
Council, and Greater Yellowstone Coalition, along with the information they produce to
their constituents, will be analyzed throughout this thesis.

<table>
<thead>
<tr>
<th>Table 1-1: Response Type to the Fish and Wildlife Service</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response Type</strong></td>
</tr>
<tr>
<td>Letters (non form letters)</td>
</tr>
<tr>
<td>E-mail Messages (non form letters)</td>
</tr>
<tr>
<td>Form Letters (individual modifications)</td>
</tr>
<tr>
<td>Form Letters (twenty five)</td>
</tr>
<tr>
<td>Public Hearing</td>
</tr>
<tr>
<td>Petitions (974 total signatures)</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
</tr>
</tbody>
</table>
Research Question:

What are the politics associated with removing a species from the Endangered Species Act?

Contribution and Purpose

The purpose of this research identifies how environmental organizations influence and shape American environmental attitudes. Building on this primary question, this thesis will provide analysis of the following: What is environmental preservation and to what extent were ecological considerations seen as important to the Federal Fish and Wildlife Services (FW)^ during the Yellowstone grizzly bear de-listing process? This thesis will further provide analysis of how effective environmental organizations are in shaping the American publics' environmental values.

Research Methods

This thesis will function under the parameters of the case study methodology. Case studies provide a fullness of explanation within an identified historical context, which enable the case to reveal itself more comprehensively. Albeit, case studies sacrifice their generalizability in order to obtain this richness of explanation. This study also examines the use of symbolic perspectives in the comments of NGOs, how they are expressed, and how NGOs represent their own and other's perspectives. This will be done through the use of telephone interviews with NGO workers who were involved in Yellowstone de-listing policy process. The Yellowstone grizzly de-listing generated a high number of public comments, which illustrates the salience of environmental issues and the public desire for input.
A comprehensive examination of the form letters drafted by environmental organizations during the public comment time-frame of the de-listing process will be used in this thesis. It is the intent of the thesis to demonstrate through form letters, that were turned in by thousands of citizens, that environmental organizations play a significant role in the shaping the American public’s environmental attitudes. However, since the ultimate decision of the Fish and Wildlife Service was to remove the Yellowstone grizzly’s protection as a threatened species, it is the intent of the researcher to explore the effectiveness of environmental organizations and public comment in the political process.

**Outline of Thesis Chapters**

Throughout this thesis I hope to show to the increased role that environmental organizations play in the political process. In order to understand the process that grizzly bear management has undergone, it is imperative to understand the history behind the settlement of the American West and the creation of the National Park System, the subject of Chapter 2. Understanding the environmental history surrounding Yellowstone grizzly management and the formation of Yellowstone National illustrates the following: Political and legal conflicts have emerged over the conservation and resource use of the grizzly bear, NGOs have modified their strategies and mission statements to champion the American public around their cause. Chapter 2 also shows how American attitudes toward nature and their mental construction of the grizzly change over time. NGOs have used this symbolic consensus to generate public participation in the political process.

This argument will continue to be developed in Chapter 3, where I will explore the effectiveness of the role of environmental organizations in the Yellowstone grizzly
case by investigating the range of public response and the strategies used by NGOs to inform the public. Chapter 3 will further serve as an attempt to evaluate the location in which individuals are rallied by symbolic consensus regarding environmental values. Chapter 3 builds upon theoretical knowledge provided in Chapter 2 and further expands upon it by analyzing an empirical case: the Yellowstone grizzly de-listing. Interviews from NGO officials and excerpts from letters generated by NGOs are examined for reoccurring themes. From this point, these themes are examined in order to further illustrate the argument of symbolic consensus among the American public and the role NGOs play in reinforcing symbols of wilderness and the West.

Chapter 4 will conclude the thesis by highlighting how the Yellowstone grizzly provides a new example in which to empirically study the relationship the American public has with the Park, the "wilderness experience", and is reflective of how Yellowstone has been designed and marketed as a landscape created to be what Americans want to believe the Old West once was. Chapter 4 will serve to sum up the overall concepts of the research by measuring the effectiveness of environmental organizations in changing environmental policy.

Approach

In order to develop the empirical data required to effectively utilize content analysis, I examined summaries and responses to public comment received regarding the proposed rule designating the Yellowstone grizzly as a distinct population segment, and removing the Yellowstone distinct population segment of grizzly bears from the federal list of endangered and threatened wildlife. The coding was conducted in order to

---

3 The official Fish and Wildlife response of public comment can be found in its entirety at: http://www.fws.gov/mountain-prairie/species/mammals/grizzly/Content_Analysis_Report_final.pdf.
provide empirical evidence for the case study in chapter four. Both direct quotes and summaries are provided within context and are a reflection of support for one or more of the hypotheses. Public comments were submitted to the Fish and Wildlife Service in accordance with requirements under the APA were placed with the Federal Registrar.4

In addition to public comment submitted to the Fish and Wildlife Service, qualitative data was collected through the use of literature that included peer-reviewed writings, published books and wildlife advocacy websites. In order to illustrate the agency of NGOs, interviews with officials in various NGO’s involved in the Yellowstone grizzly case were also conducted and are used throughout this thesis.

Public comment was taken from November 17, 20055 until March 20, 2006. Public comments were either coded as in favor of the de-listing process or as opposed to the de-listing process. Comments that withheld a stance were not included in this analysis. A total of 164,486 individuals, organizations, and government agencies responded to the Proposed Rule to de-list the Yellowstone grizzly. Due to the number of comments received, the summary includes trends and common concerns.

Conclusion

Species preservation is a contentious topic which hits on a nerve of the American public. The de-listing of the Yellowstone grizzly provides an example of this phenomenon by empirically showing the shockwave that went beyond NGOs, local communities, and scientists. Whether the individual’s position was for or against the de-

5 (70 FR 69844)
listing of the Yellowstone grizzly, the passion behind it was fierce. This thesis is an attempt to examine both sides of the Yellowstone grizzly de-listing example, through the case study and process tracing methodologies, in order to analyze current American environmental values and provide insight to where these values are shaped.
CHAPTER 2

A HISTORICAL CONTEXT OF GRIZZLY MANAGEMENT IN YELLOWSTONE NATIONAL PARK

Introduction

The Yellowstone grizzly provides a case of the relationship between American environmental organizations the Forest Service, National Park Service and the Fish and Wildlife Service. This chapter seeks to understand the historical background of that relationship. The chapter is arranged as follows. The first segment provides a brief background on the creation of the Endangered Species Act as a piece of legislation. The second segment describes the role of the National Park System and Yellowstone as a leader in species management and, the third evaluates historical wilderness themes and values.

The Wilderness Act

Prior to exploring the issues that surround the Endangered Species Act it is important to understand the Act’s origins. Part of the problem surrounding the decision to de-list the Yellowstone grizzly stems from the original language of the Endangered Species Act’s predecessor, the Wilderness Act, because it provided tremendous room for interpretation. The 1964 Wilderness Act has continued to stand the test of time, remaining virtually unchanged for 44 years. The Act is challenged to ensure stewardship toward wild and natural places, "To establish a National Wilderness Preservation System"
for the permanent good of the whole people and for other purposes."6 The task of keeping the wilderness wild has proved problematic in application, and as stated in the Wilderness Act “affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable.”7

The Yellowstone grizzly case provides the academic world a contribution because it exemplifies the challenges posed to policy makers. Wilderness stewardship seeks to maintain the wildness of wilderness in coexistence with providing accessibility for human use. The mission of the Wilderness Act provides fodder for both conservationists and preservationists to be at odds with one another while simultaneously arguing their cases are re-enforced by the same piece of legislation. However, despite the few changes that have occurred to it the Wilderness Act continues to muddle matters by stating that the purpose of the National Park Service is: “...for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness and so far as to provide for the protection of these areas, and the preservation of their wilderness character and for the gathering and dissemination of information regarding their use and enjoyment as wilderness...”8

Section 4(c) of the Wilderness Act overviews the actual uses of wilderness areas and further exacerbates confusion by implementing provisions on activities which are not allowed within the park because they interfere with preservation efforts (i.e., commercial enterprise, motorized equipment, roads, structures and installations). However, motorized equipment including cars, and motorcycles are allowed into national parks across the country including Yellowstone and likewise roads have been built into parks in

---

7 Ibid.
order to provide visitors the ability to travel greater distances, more quickly across the Park.

Despite the outcome of the Yellowstone grizzly de-listing it is important to note that the case is not reflective of the final achievements in wilderness preservation, as allocating responsibility to federal agencies is only part of the task. The role of environmental organizations brings the thoughts of George Marshall, former president of the Sierra Club and brother of wilderness advocate of Robert Marshall, into fruition, “At the same time that wilderness boundaries are being established and protected by Acts of Congress, attention must be given to the quality of wilderness within these boundaries, or we may be preserving empty shells.” (Marshall, 1969). The story that unfolds between environmental organizations involved with the de-listing process and federal agencies exemplifies the challenge of wilderness management: to form and implement programs of stewardship and protection that achieve the objects of wilderness policy.

The Evolution of the American West

There is a story which Americans have long subscribed to, the one about the Old West, the frontier. For the greater part of the 20th century it was a story recounted by Americans. The story told us where we came from and who we were. Historian William Cronin (1992) explained it as, “the ability to turn ordinary people into heroes and to present a conflict ridden invasion as an epic march toward enlightened democratic nationhood.” Still a powerful tale, the myth of the West has helped to define the American psyche and create a collective identity. These stories sold the West with
promises of paradise, stories about free land, abundant water, gold, silver, but above all, opportunity.  

Donald Worster (1992), an environmental historian, argues that a New West has emerged out of research and literature in reaction to understanding the gaps in agrarian literature. The drive for economic development of the West was often ignorant of the environmental toll and in its wake left depletion and ruin. By the 1890s farms dotted the landscape of the plains, cattle had been fenced into corporate ranches and mines occupied the mountainsides. The Old West was gone. In 1893, nostalgia began to creep into the heart of the American public (Turner, 1986). Anything valuable enough to have survived the push Westward was noted to be special and in need of saving. National parks like Yellowstone (1872), Yosemite (1900), and Glacier (1910) became national symbols and soon tourists came seeking out the experience of a world outside of progress. Their search was one which was rooted in a desire to experience things preserved within the parks boundaries but were lost in the name of progress: wildlife, canyons, glaciers, mountains, the frontier and the general wilderness experience.

Yellowstone National Park became renowned as a recreation hotspot and for decades lived up to this expectation. It was assumed that Yellowstone had existed in this capacity forever and would continue to in the future (White, 1991). This assumption was believed largely due because, “the government promised to protect the national parks and preserve them as symbols of America’s heritage,” (Barringer, 1962). Examples of such promises include Congress’s decision to allocate the responsibility of maintaining

9 In no other written document is this sentiment made more clear than where Horace Greeley pronounces, “Go West, young man and seek your fortune.” This can be found in: Cross, C II. (1995) Go West, Young Man! Horace Greeley’s Vision of America: Albuquerque, University of New Mexico Press
10 lb. 156
national parks to the Department of Interior. Later in 1916, this responsibility was tasked to the National Park Service, which is within the Department of Interior.

Problems began to arise with the ambiguity of the language surrounding the law, specifically dealing with the mission of the National Park Service and the national parks it was to protect. The law states that the National Park Service must promote national parks, "...to promote and regulate the use of the...national parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

Critics argue that the experience visitors sought after was diluted. The old story of the American West neglected the story of Native Americans, marginalized ethnic minorities and women and even the environment itself. Runte argued against the idea that national parks were even the brainchild of forward-thinking, altruistic individuals stating they "encompassed only those features considered valueless for lumbering, mining, grazing, or agriculture and were worthless in the traditional sense," (Runte, 1979). Since the Western narrative involved the idea of the rugged mountain man and the savage Indian went unchallenged for most of the 20\textsuperscript{th} century, it appeared that National Parks were provided as a protected area, structured in a manner where everyone could enjoy a piece of environmental history.

Finally, while some scholars have stated that, "our wild parks are sacred earth which cannot be bought and sold,"\textsuperscript{12} it should be noted that this idea is not entirely true. National parks, like Yellowstone, did not escape commercial development because they

\textsuperscript{11} National Park Service Organic Act, 16 U.S.C.1.
\textsuperscript{12} Ib.
were valued as a public treasure. Rather they became some of the most commodified land in the nation albeit in a more subtle manner.

**The Endangered Species Act**

Since 1966, three federal statues have been implemented in the United States to attempt to establish coordinated programs to rectify what appeared to be the disappearance of multiple wildlife species. Despite the recent removal of the grizzly bear from the Endangered Species Act in the Greater Yellowstone Ecosystem, for decades the grizzly was boasted as one of the most noted animals on the list. It is also imperative to understand the Endangered Species Act in order to comprehend the manner in which environmental organizations have used its language to champion their own case to their constituents.

The Endangered Species Act was the third in a series of laws aimed at protecting species; however, it was the first to offer protection to any species in danger of extinction throughout all or a significant portion of its range (Carroll et al, 2006). The Supreme Court has described the Act as, "the most comprehensive legislation for the preservation of endangered species ever enacted by any nation."\(^{13}\) The purpose of the Act is to protect species, defined as "any species which are in danger of extinction throughout all or a significant portion of its range."\(^{14}\) Congress recognized that these species of fish, wildlife, and plants are of aesthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people."\(^{15}\)

---

\(^{14}\) 16 U.S.C. § 1531 (a); (20) (2000).
\(^{15}\) Id. § 1531 (a) (3).
The original intent of the Endangered Species Act in 1966\(^{16}\) was to begin a federally based effort to protect endangered species within the United States. Like the Wilderness Act, the Endangered Species Act included vague language which made enforcement of the Act's goals more difficult. Examples of vague language include that the Secretary of the Interior was directed to review other programs within the Department of Interior with the intent and purpose of which to use them, "to the extent practicable" for furthering the goals of the endangered species program as well as to, "encourage other Federal agencies to utilize, where practicable, their authorities in furtherance of the program" (Bean & Rowland, 1997).

Throughout the years Congress has tightened up the language of the Act with the most notable changes being made in the Endangered Species Act of 1973. In the Endangered Species Act of 1973\(^ {17}\) Congress recognized and remedied many of the unclear language of the Act by adding that it provide, "a means whereby the ecosystems upon which endangered species depend may be conserved."\(^ {18}\) Not stopping here, Congress further provided enforcement features into the Act by declaring a policy, "that all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act."\(^ {19}\) Congress further eliminated any chance of vague language and misinterpretations by defining the wildlife and plant species to be included in the Act for protection included any member of the animal or plant kingdoms (Bean, Rowland, 1997).

---

\(^{16}\) Public Law No. 89-669, 1-3, 80 Stat. 926. Sections 4 & 5 consolidate land under the authority of the Department of the Interior.

\(^{17}\) Public Law No. 93-205, 87 Stat. 884

\(^{18}\) Ibid.

\(^{19}\) Ibid.
However, endangered species protection illustrates the problem of conflicting legislation direction. For example, the Wilderness Act limits managerial freedom to alter an area’s value for any particular purpose, including wildlife. On the other hand, the Endangered Species Act directs agencies to make sure no actions are taken that may “jeopardize the continued existence of any endangered species or threatened species or results in the destruction or adverse modification of designated critical habitat.”

Once listed, a species is afforded Endangered Species protection. Section 7 of the Act prohibits any federal action that may jeopardize a species. Section 9 prohibits any individual from taking an endangered species. A “take” is defined as, “harass, harm, pursue, hunting, shoot, wound, kill, trap, capture, or collect, or to attempt in any such conduct.” Section 7 further states that a nonessential experimental population will be treated as a threatened species only when within the confines of a National Park or National Wildlife Refuge. Section 7 continues by highlighting that all federal agencies must consult with the Department of Interior in order to determine that their actions will not harm a listed species or the habitat in which the species resides. The Fish and Wildlife Service is the agency which is responsible for the implementation of the Endangered Species Act within the Department of Interior. The Fish and Wildlife Service followed up on the Endangered Species Act by establishing and granting various subspecies of the grizzly bear protection: Yellowstone, Northern-Continental Divide, Selkirk, Cabinet-Yaak, and North Cascades. This distinction of population segments

---

20 Id. § 1536 (a) (2).
22 Id. § 1536 (e) (2).
23 Id. § 1536 (e) (2).
24 16 U.S.C. § 1539 (j) (2) (C) (i).
26 See http://www.fws.gov/mountain%2Dprairie/species/mammals/grizzly/.
proved a key argument with environmental organizations during the public comment process and will discussed later in the chapter.

**Historical Wilderness Themes and Values**

In order to more insightfully study environmental attitudes of the American public regarding wilderness preservation, it is important to understand what “wilderness” means. At one extreme, wilderness can be defined in legal perspective as an area adhering to the definition provided by the Wilderness Act of 1964 and on the other extreme it can be potentially be defined as the entire universe. As this thesis is focused on the role of environmental organization on federal agencies, it is important to note that the range of public comment did not adhere to a particular definition. The lack of a definition indicates the purpose that public comment is designed to achieve, meaning a dialogue between the individual and the State.

The goal of wilderness management is to protect a designated wilderness area’s naturalness and solitude. Problems surface quickly because the diversity of motives and values among wilderness users complicate policy direction. On March 2nd, 1872 Congress established Yellowstone National Park, America’s and the world’s first National Park. Congress’s decision was significant because it recognized for the first time that public lands should be set aside and overseen by the federal government with the purpose of “the benefit and enjoyment of the people” (Culpin, 2003). However, the establishment of Yellowstone, in the beginning, had very little to do with providing a wilderness experience for park users. Yellowstone’s first tourists went seeking a wilderness experience, but not too wild. Advertisements for the park included coaches, lavishly decorated lodges and tourists dressed in high fashion.
Yellowstone National Park, as it was in the late nineteenth century, is still a place and an ideal. The notions attached to it during its Wonderland era, as a place of virgin wilderness and "a living reminder of what our country was like before it was civilized and developed," (Barringer, 1962) has kept the Park on the tops of must-see attractions. Increasingly, in the past century, Yellowstone's notability as the nation's first and largest federal park has solidified it as an emblem of the American wilderness, further signifying it in the American national creation myth.

Over time the experience Yellowstone tourists sought out changed. As values shifted the public began to see the Park as a national treasure. As a result, environmental policy evolved. The Endangered Species Act, the Wild and Scenic Rivers Act and the Wilderness Act are all reflective of the intrinsic value that the American public has placed on the environment and of the expectations they have accrued when they visit a national park (Hendee & Dawson, 2002). Cumulatively, these policies also demonstrate the federal government's responsibility to establish guidelines for lands under their jurisdiction. The Yellowstone grizzly example validates the function of federal agencies, but at the same time, demonstrates the conundrum of policy makers to pass flexible legislation.

In the 1970s, biologists conducting a landmark study of the habitat of the Yellowstone grizzly bear concluded that its range extended over more than five million acres, of which little more than two million were encased inside the boundary of Yellowstone National Park. This determination allowed for scientists to conceive of the
idea of the Greater Yellowstone Ecosystem (Click & Carr & Harting, 1991) However, the idea of ecosystem based management has not caught on as easily as many environmentalists had originally hoped. The realities of altered populations and decreased biodiversity have become more apparent. Wildlife reported by Theodore Roosevelt in his 1903 excursion is increasingly more difficult to find. Among these species include mule deer, white tail deer, antelope, and beaver.

**Yellowstone's Role in Protecting the Grizzly**

Yellowstone became a haven for grizzlies upon its founding in 1872. However, the Park’s role in species protection can be attributed less to forces from within the park and has more to do with forces from beyond Yellowstone’s borders. Since its establishment in 1916 the National Park Service has struggled with the dubious task of maintaining Yellowstone in a manner which reflects its mission of preservation alongside the desires of human visitors and evolving ideas about the management of nature.

In North America, the grizzly was once present across a wide swath of the continent from Alaska to central Mexico. The expansion of human settlement, the move westward, the growth of agriculture and livestock industry, trapping and hunting, and federal and state predator control led to the extermination of the grizzly (Table 2-1). When the grizzly was classified as a threatened species in the lower 48 states under the Endangered Species Act in 1975 they had been eliminated from approximately 98 percent of their historic range.28

---

27 Glick, D., Carr M., and Harting, B. eds., *An Environmental Profile of the Greater Yellowstone Ecosystem* (Bozeman: Greater Yellowstone Coalition, 1991), 10. The grizzly bear study was conducted by Frank and John Craighead.

The grizzly has faced its own struggles even within the confines of federally protected land. Collectively recognized as the first noteworthy grizzly studies were those of John and Frank Craighead conducted within YNP. In 1959, the Craighead brothers examined more than 600 grizzlies taking their basic measurements of length, weight, girth and other physical data. Between 1961 and 1969, they radio-tracked 48 grizzlies and gained fame far and wide as a result of a television special by National Geographic that covered their research (Craighead, Jr., F., & Craighead, J. 1966). However, the Craighead’s spoke out after the garbage-dump-feeding era was suddenly ended in Yellowstone in the late 1960s (Craighead, Jr., F., & Craighead, J. 1966). As a result, the brothers were no longer welcome to do research in the park and the first major grizzly bear study in the world came to an abrupt end. Upon the closure of the garbage feeding areas, officials moved to restore the natural patterns of grizzly bear populations feeding and migration within the Park (Magoc, 1999). After the closing of the garbage dump feeding areas, officials began the daunting task of restoring grizzly bear population and migration.
Table 2-1: Documented Last Grizzlies Sighted and Location

<table>
<thead>
<tr>
<th>State</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arizona</td>
<td>1935</td>
</tr>
<tr>
<td>California</td>
<td>1922</td>
</tr>
<tr>
<td>Colorado</td>
<td>1979</td>
</tr>
<tr>
<td>Nevada</td>
<td>1907</td>
</tr>
<tr>
<td>New Mexico</td>
<td>1933</td>
</tr>
<tr>
<td>North Dakota</td>
<td>1897</td>
</tr>
<tr>
<td>Oregon</td>
<td>1931</td>
</tr>
<tr>
<td>Texas</td>
<td>1890</td>
</tr>
<tr>
<td>Utah</td>
<td>1923</td>
</tr>
</tbody>
</table>

habitats to their historic beginnings in the Yellowstone area. However, opposition quickly followed from forces outside of the Park, particularly from the U.S. Interstate System which was attempting to build more extensively throughout the Yellowstone Ecosystem (McNichol, 2003). Restoration efforts in the Fishing Bridge area of Yellowstone were further thwarted in the mid-90s with the onset of the Yellowstone park budget crisis (Janofsky, 1999).

In 1982, the Fish and Wildlife Service approved a Grizzly Bear Recovery Plan, whose original objectives were the following:

1. Identify grizzly bear population goals that represent species recovery in measurable and quantifiable terms from the regions that were determined to have suitable habitat for such populations, and to provide a database that will allow informed decisions.
2. Identify population and habitat-limiting factors that account for the current populations existing at levels requiring threatened status under the Endangered Species Act.

3. Identify specific management measures needed to remove population limiting factors that will allow the populations to increase or sustain themselves at levels identified in the recovery goals.

4. Establish recovery of at least three grizzly bear populations in three distinct grizzly bear ecosystems in order to de-list the species in the continuous 48 states.

When the plan was revised in 1991, the stated objective was “to reach viable populations of grizzly bears in each of the areas where grizzly bears are present or were suspected in 1975 in the states of Montana, Washington, Idaho, Wyoming and Colorado where the habitat is able to support a viable population.” Later, in 1993, Colorado was omitted altogether. At this same time, only 30 adult females remained in the Greater Yellowstone.

It wasn’t until 1999 that Chris Servheen, a grizzly bear recovery coordinator, observed that the Yellowstone grizzly had made steps in recovery. “Numbers appear to be on the rise, at least in the Greater Yellowstone Ecosystem. Our counts indicate an absolute minimum of 262 grizzlies there and possible as many as 500,” said Servheen (“Helping a Great Bear Hang On”, Dec. 1998/ Jan. 1999). It was at this point that the groundwork for de-listing in the Greater Yellowstone began.
Environmental Organizations, the ESA and the Yellowstone Grizzly

The function of environmental groups on the management of federal and public lands has a long-standing history in the United States. While the original intention of conservation groups in the 1930s emphasized the “draw a circle around it and let it alone” mentality, their mission and role quickly became more complex. For instance, the Wilderness Society, which included members such as Robert Marshall and Aldo Leopold, held the primary focus of “holding wild areas soundproof as well as sight proof from our increasingly mechanized life” (Nash, 1982). While the intention of the conservation groups was originally more focused on keeping adverse influences from outside of the boundaries of national parks, it later evolved into understanding and controlling what was happening within park boundaries.

Conservation efforts of environmental organizations became most visible in the 1970s when a tremendous amount of attention was placed upon environmental issues in the United States. This increased attention by the American public was spurred by the visibility of environmental degradation occurring both internationally and domestically (Dunlap, 1995). Environmental organizations, such as The Wilderness Society, the Sierra Club and the Audubon Society, further helped to bring environmental issues to the broader American public in a real and meaningful way during this time. By acting as a mediator between the public and Administration, environmental organizations were able to direct the focus of policy for nearly 10 years. A shift had occurred within the American public’s view of nature and the environment that opened the gates for these environmental groups to suddenly have a tremendously greater amount of political sway.
It was also during this point that volunteer worker programs expanded considerably in national parks, while at the same time the budget cuts for national parks were being reduced. Environmental groups and wilderness management were switching traditional gears and began to focus more heavily on the power of education (Hendee & Dawson, 2002). It was at this point that the new breed of an individual involved with an environmental organization was born. These individuals were concerned about protection wilderness resources and values, and respecting the interest of other wilderness users. Evidence of this includes programs like Save the Whales, and the attraction of environmental groups to other various charismatic mega-fauna.

The grizzly example in the Greater Yellowstone Ecosystem is reflective of the evolution of environmental groups ability to “learn to play the game” with the federal government and current Administration. The use of public comment process was heavily utilized by environmental groups in order to make their agenda, mission and ultimately, and their group’s values be known to the Fish and Wildlife Service throughout the de-listing process. Ultimately the decision remained to continue with the de-listing procedures. Chapter 3 continues to explore the Yellowstone grizzly case, and evaluate the literature in respect to modern example.

This chapter’s objective was to set the stage for systematic and progressively more detailed discussion related to wildlife preservation, the role of conservation groups, Yellowstone Park and federal policy. Furthermore, this chapter explored the meaning of wilderness, and basic themes and values espoused by the evolution of environmental groups and the American public. The Yellowstone grizzly case study was offered as an evaluation tool to judge the effectiveness of environmental groups and federal agencies to
provide policy which fulfills its obligation to the Wilderness Act and the American public.
CHAPTER 3

IS THE PUBLIC BEING HEARD?: ANALYSIS OF THE ROLE OF PUBLIC COMMENT IN THE YELLOWSTONE DELISTING PROCESS

Introduction

The grizzly bear was labeled as a distinct population segment and de-listed as a threatened species in the Greater Yellowstone Ecosystem on April 1, 2007. Environmental groups, scientists and the concerned section of the American public were split on the implications of de-listing the bear. Questions ranged from the validity of the science used in various studies used related to de-listing, the temporal implication of de-listing, the role of ecological science, and the political motivation behind the federal government choosing the Greater Yellowstone Ecosystem as a location to de-list the bear.

Most Americans were unable to provide technical insight into the de-listing process of the Yellowstone grizzly. However, they were able to write about and discuss their feelings toward federal management in the form of a public hearing and letters to the editor. Citizens could also submit a letter in opposition to de-listing to the Fish and Wildlife Service generated by an environmental organization. The Yellowstone grizzly

---

29 Data collected by the US Wildlife and Fish Service as dictated by the National Environmental Protection Agency dictates the split that existed between individuals and groups on either side of the issue. This will be further explained in the Methods and Data section of my paper.

30. The idea that subsections of the grizzly population have been listed as endangered while others have not is a controversial topic regarding the Endangered Species Act. For this reason the idea of the Y2Y (Yellowstone to Yukon) trail has been proposed. This would create a corridor between ecosystems containing grizzly bears stretching from current populations in the Greater Yellowstone Ecosystem to the Yukon territory of Alaska.
example illustrates the use NGOs rallying the public in the form of generating and distributing pre-made letters. Environmental organizations provided an arena for playing out three types of conflicts that have long plagued environmental decision-making processes, to include the Yellowstone grizzly de-listing: conflicts over the trust of federal agencies, the use of science, and the role of public values.

The goal of Chapter 3 will be to highlight elements of symbolic consensus that environmental organizations used to motivate public response during the Yellowstone grizzly de-listing and show points of contentions within a broader frame of values. These cues from environmental organizations demonstrate an overarching American public opinion regarding solutions that are compatible with current wilderness and wildlife management ideas. The chapter will be broken up into two sections. The first section of the chapter highlights the general make-up of public comment received by the Fish and Wildlife Service and compares general themes generated by the NGOs that were used to generate response. The second half of the chapter will analyze certain environmental organizations and the relationship between the organization and the Fish and Wildlife Service.

Public Involvement during the Yellowstone Grizzly De-listing Process

Table 3-1 provides a benchmark for the public involvement process throughout the Yellowstone grizzly delisting process. The public comment period for the Proposed Rule extended from November 17, 2005 through March of 2006. During that time over 190,000 responses were received by the Fish and Wildlife Service demonstrating a range of positions regarding the process. While it may seem that individuals would fall into one of two camps (i.e., either being for or against the de-listing of the Yellowstone
grizzly) in reality, the public comment process reveals a much more convoluted and complex narrative. Environmental organizations which were opposed to de-listing the Yellowstone grizzly can be categorized into three themes. The three themes that occurred most frequently among the form letters were the following: values driven principles, scientifically driven principles or an inability to trust the transition from federal to state based grizzly management. Typically, the rationale behind resisting the Yellowstone grizzly de-listed wasn't solely emotional, the way in which human rights networks have been discussed as functioning (Keck & Sikkink, 1998). 31 Rather, environmental organizations appealed to individuals by functioning under broader focus areas: using scientific rational, focusing on a lack of a response plan in the case that the Yellowstone grizzly population declined after de-listing, and rationalizing that proper habitat conservation must occur in connecting corridors to the Greater Yellowstone prior to de-listing being deemed an appropriate action, among others. Examples and excerpts from each of the key themes will be given later on during the analysis.

31 On page 1 Keck and Sikkink define transnational advocacy groups as networks of activists, distinguishable largely by the centrality of principled ideas or values motivated their formation.
### Table 3-1: Benchmarks of the Grizzly De-listing Public Comment Process

<table>
<thead>
<tr>
<th>Date/Year</th>
<th>Part of the Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>September 2005</td>
<td>Formal Outreach Plan developed by Region 6 US Fish and Wildlife Service</td>
</tr>
<tr>
<td>November 2005</td>
<td>Proposed Rule published in Federal Registrar</td>
</tr>
<tr>
<td>November 2005</td>
<td>Press release posted online and sent to news interests announcing the Proposed Rule</td>
</tr>
<tr>
<td>November 2005</td>
<td>Press conference with Secretary of the Interior, Gail Norton</td>
</tr>
<tr>
<td>November 2005</td>
<td>Proposed Rule made available on-line at Fish and Wildlife Service web-site</td>
</tr>
<tr>
<td>November 2005</td>
<td>Conference call with Fish and Wildlife Service, environmental groups, and NGO’s to discuss the Proposed Rule</td>
</tr>
<tr>
<td>January 2006</td>
<td>Press releases announcing the upcoming open houses to discuss the Proposed Rule</td>
</tr>
<tr>
<td>Monday, January 9, 2006: Bozeman, MT</td>
<td>Open house/informational meeting held on Proposed Rule</td>
</tr>
<tr>
<td>Tuesday, January 10, 2006: Cody, WY</td>
<td>Open house/informational meeting held on Proposed Rule</td>
</tr>
<tr>
<td>Wednesday, January 11, 2006: Jackson, WY</td>
<td>Open house/informational meeting held on Proposed Rule</td>
</tr>
<tr>
<td>Thursday, January 12, 2006: Idaho Falls, ID</td>
<td>Open house/informational meeting held on Proposed Rule</td>
</tr>
<tr>
<td>Tuesday, January 10, 2006: Cody, WY</td>
<td>Formal public hearing</td>
</tr>
<tr>
<td>Thursday, February 9, 2006: Bozeman, MT</td>
<td>Formal public hearing</td>
</tr>
<tr>
<td>February 2006</td>
<td>Public comment period extends an additional 30 days</td>
</tr>
<tr>
<td>March 2006</td>
<td>Public comment period ends</td>
</tr>
</tbody>
</table>

### Demographic Summary of Respondents

With the release of the Fish and Wildlife Service response to public comment on the Yellowstone grizzly de-listing two summaries of respondents were provided by the agency. Table 3-2 demonstrates how the organizational type of a respondent was coded. Table 3-2 demonstrates an interesting factor about the manner in which the Fish and
Wildlife Service wanted to portray respondents. The breakdown of a typical respondent alludes to the theory that individual citizens were highly motivated to respond to the de-listing. Furthermore, Table 3-2 insinuates that individual citizens were not organized by elites or outside organizations and instead took their own initiative to respond to the Yellowstone grizzly de-listing.

Table 3-2: Demographic Breakdown of Respondents

<table>
<thead>
<tr>
<th>Organization Type</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business Owners</td>
<td>32</td>
</tr>
<tr>
<td>Congressional/Legislative Representatives</td>
<td>2</td>
</tr>
<tr>
<td>County Government</td>
<td>4</td>
</tr>
<tr>
<td>Environmental Interest</td>
<td>34</td>
</tr>
<tr>
<td>Individual Citizens</td>
<td>164,204</td>
</tr>
<tr>
<td>Industry Interest (ranch/timber/mine, etc)</td>
<td>10</td>
</tr>
<tr>
<td>Private Organization</td>
<td>1</td>
</tr>
<tr>
<td>Professional Scientific Organization</td>
<td>7</td>
</tr>
<tr>
<td>Recreational Interest</td>
<td>14</td>
</tr>
<tr>
<td>Social/Political Interest</td>
<td>3</td>
</tr>
<tr>
<td>State Agency</td>
<td>2</td>
</tr>
<tr>
<td>State Government</td>
<td>3</td>
</tr>
<tr>
<td>Unknown</td>
<td>1</td>
</tr>
<tr>
<td>Youth</td>
<td>169</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>164,486</strong></td>
</tr>
</tbody>
</table>

As previously addressed, Table 3-2, illustrates the organization that a respondent stated they were affiliated with during the public comment process. However, Table 3-3 paints a different picture. While Table 3-2 shows that 164,204 individuals participated in some form of petition it also implies that no organization was established to motivate their response. Table 3-3 explains where the potential motivation was coming from in order to inspire a concentration of individual responses given that 182,223 of the total responses were provided through form letters. Going further, the Fish and Wildlife Service divulged that of the twenty-five form letters twenty-one of these form letters opposed the de-listing process, four favored de-listing and one letter was unclear about its
overall opinion. Furthermore, the Fish and Wildlife Service explained that multiple individuals added their own personal comments to the form letters. These modified comments were labeled and presented in the "Comments on Issues" section of the Fish and Wildlife Service "Summary of Public Comments."

<table>
<thead>
<tr>
<th>Response Type</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Letters (non form letters)</td>
<td>857</td>
</tr>
<tr>
<td>E-mail Messages (non form letters)</td>
<td>2,172</td>
</tr>
<tr>
<td>Form Letters (individual modifications)</td>
<td>8,229</td>
</tr>
<tr>
<td>Form Letters (twenty-five)</td>
<td>182,223</td>
</tr>
<tr>
<td>Public Hearing</td>
<td>85</td>
</tr>
<tr>
<td>Petitions (974 total signatures)</td>
<td>12</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>193,578</strong></td>
</tr>
</tbody>
</table>

Analysis of Form Letters Response Type

Table 3-4 illustrates the environmental groups that participated and drafted form letters to the Fish and Wildlife Service, the stance the organization took on de-listing, the number of individuals who sent the form letter back to the Fish and Wildlife Service and the number of modified responses. The Fish and Wildlife Service outlined each of the key issues that was drafted on the form letter and summarized them throughout the "Summary of Public Comments." The researcher acknowledges that multiple form letters have an unknown originator. While the traceability of the individuals who created the drafted letter was compromised by not having access to its origin the researcher feels that for the purpose of the overall concepts highlighted in this thesis that they should be included in the analysis.

32 [http://mountain-prairie.fws.gov/species/mammals/grizzly/yellowstone.htm](http://mountain-prairie.fws.gov/species/mammals/grizzly/yellowstone.htm) as viewed on February 4, 2008. The form letter in which no opinion could be deciphered was eliminated from the process tracing process for the purpose of the Fish and Wildlife Service's research. An explanation of a need to adhere to brevity was listed as the reason behind their rational.
Table 3-4: Breakdown of NGOs Stance on Grizzly De-listing

<table>
<thead>
<tr>
<th>Organization</th>
<th>Position on Delisting</th>
<th>Total # of Responses</th>
<th>Total # of Modified Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Resources Defense Council</td>
<td>Against</td>
<td>91,200</td>
<td>639</td>
</tr>
<tr>
<td>Sierra Club</td>
<td>Against</td>
<td>533</td>
<td>15</td>
</tr>
<tr>
<td>New Jersey 1st Grade Class</td>
<td>Against</td>
<td>37</td>
<td>0</td>
</tr>
<tr>
<td>Greater Yellowstone Coalition</td>
<td>Against</td>
<td>1,843</td>
<td>141</td>
</tr>
<tr>
<td>Unknown</td>
<td>For</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>Unknown</td>
<td>Unknown</td>
<td>6</td>
<td>0</td>
</tr>
<tr>
<td>Earth Justice</td>
<td>Against</td>
<td>15,897</td>
<td>258</td>
</tr>
<tr>
<td>Unknown</td>
<td>Against</td>
<td>17,358</td>
<td>3,094</td>
</tr>
<tr>
<td>Unknown</td>
<td>For</td>
<td>10</td>
<td>0</td>
</tr>
<tr>
<td>Humane Society of the United States</td>
<td>Against</td>
<td>1,107</td>
<td>28</td>
</tr>
<tr>
<td>Unknown</td>
<td>Against</td>
<td>19</td>
<td>0</td>
</tr>
<tr>
<td>Sierra Club</td>
<td>Against</td>
<td>41,473</td>
<td>3,014</td>
</tr>
<tr>
<td>National Wildlife Fund</td>
<td>For</td>
<td>575</td>
<td>8</td>
</tr>
<tr>
<td>Predator Conservation Alliance</td>
<td>Against</td>
<td>22</td>
<td>9</td>
</tr>
<tr>
<td>Defenders of Wildlife</td>
<td>Against</td>
<td>22,057</td>
<td>1,006</td>
</tr>
<tr>
<td>Sierra Club</td>
<td>Against</td>
<td>9</td>
<td>5</td>
</tr>
<tr>
<td>Great Bear Foundation</td>
<td>Against</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Unknown</td>
<td>Against</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Unknown</td>
<td>Against</td>
<td>19</td>
<td>2</td>
</tr>
<tr>
<td>Sierra Club Grizzly Bear Project</td>
<td>Against</td>
<td>1,044</td>
<td>4</td>
</tr>
<tr>
<td>National [sic] Resources Defense Council</td>
<td>Against</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Unknown</td>
<td>Against</td>
<td>7</td>
<td>0</td>
</tr>
<tr>
<td>Larry Fahn</td>
<td>Against</td>
<td>76</td>
<td>6</td>
</tr>
<tr>
<td>Unknown</td>
<td>For</td>
<td>4</td>
<td>0</td>
</tr>
</tbody>
</table>
NGOs Demonstrate Ability to Overcome Obstacles to Public Participation

Public participation demonstrates that environmental decision making should include multiple stakeholders. Conflicting scientific perspectives, government agendas, and citizen's preferences are forced to engage and cooperate with one another in order to obtain an outcome where all parties are, at least partially, comfortable. Furthermore, the use of public comment as a legitimate means of gathering information about an environmental policy issue sheds light on the potential use and misuse of power to privileged actors. Building on this idea, by including the average citizen into the environmental decision making process a chasm is created between the layperson and scientific elites. Renn (1995) recounts that the transformation of an imbalanced power relationship is significant, particularly in American policy making.

Despite the Yellowstone grizzly example allowing a structured opportunity for public involvement, the emphasis on science-based decision making discouraged the expression of average citizens. Many have criticized the privileging of scientists over average citizens in environmental decision making (Short, 1999; Wynne 1996; O'Brien, 2002). Scientists and governmental officials have been accused of couching debates under technical terminology which has led to public mistrust (Szasz and Meuser 1997). However, others have argued that by allowing public participation to shape a non-scientific discourse, government officials are forced to include value based criteria into the decision making process (McAvo, 1998). Given these limitations and the understanding that public involvement was crucial to the de-listing of the Yellowstone grizzly, I will examine the impact of environmental organizations on participation platforms.
This thesis holds that the structural obstacles discussed above point to serious problems in the way public-involvement processes are carried out and that only a reflexive application of the role of environmental organizations to public participation processes can move beyond these obstacles. The research I discuss investigates environmental organizations use of symbolic consensus about wilderness themes and ideals and their ability to mobilize the public in the political process.

The Role of Trust

The overwhelming theme of the form letters generated by environmental organizations was not that the Yellowstone grizzly should never be considered for de-listing. Rather, the contrary argument was made, that the Yellowstone grizzly’s success in recent decades is reflective of the success of the Endangered Species Act was offered multiple times throughout the twenty-one supportive form letters. During a telephone interview the Montana Conservation/Litigation Committee Chair of the Sierra Club, Jerry Nichols, stated, “Although controversy characterizes many aspects of grizzly recovery, there is little to dispute about the fact that the grizzly would not have remained in the lower forty-eight states without the protection of the Endangered Species Act.”

However, several environmental organizations that were familiar with the philosophy and practices of endangered species removal explained that the temporal appropriateness of the de-listing of the Yellowstone grizzly raised issues regarding trust in the Fish and Wildlife Services decision. Accordingly, one form letter from the Natural Resources Defense Council wrote:

*I would love to see grizzly bears removed from the endangered species list when they are ready but that will not be the case until permanent protections are put in place to preserve their habitat and ensure their long-term survival.*
Prematurely removing the species from the endangered species list for political reasons would undermine the bears’ chances of fully recovering across the country. -EarthJustice

More than three decades of work and expense have been investment in Yellowstone’s grizzly population. I am outraged that at the slightest sign of recovery, the USFWS is willing to sacrifice that work to satisfy hunting and business interests. -Humane Society of the United States

This common consensus: over being angry at the federal government for de-listing the bear once it met the minimum standard was shared again by Nichols, stating “Implementation of grizzly bear management has been far from perfect, at times, but the actions taken by the Endangered Species Act authority have made an essential difference in maintaining the grizzly bears current population.” Nichols went on to explain that when the Sierra Club originally decided to make the Yellowstone grizzly de-listing a priority that one of the major reasons was the case’s direct application to the Sierra Club’s mission statement (Table 3-5). The Sierra Club Mission statement is four-fold:

1) To explore, enjoy and protect the wild places of the earth
2) Practice and promote the responsible use of the earth’s ecosystems and resources
3) Educate and enlist humanity to protect and restore the quality of the natural and human environment
4) Use all lawful means to carry out these objectives. Nichols relayed that the Montana chapter of the Sierra Club felt that it had a vested interest in protecting the Yellowstone grizzly and knew that they could court on the support of Sierra Club members. Once the Sierra Club distributed the pre-formatted letter to members across the country the local chapters in Montana, Idaho and Wyoming all began to rally their local communities by encouraging participation in town hall meetings, writing letters to the editors of local papers and requesting to be interviewed on local television networks.
Table 3-5: Sierra Club Mission Statement

<table>
<thead>
<tr>
<th>Sierra Club Mission Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.) Explore, enjoy and protect the wild places of the earth.</td>
</tr>
<tr>
<td>2.) Practice and promote the responsible use of the earth’s ecosystems and resources.</td>
</tr>
<tr>
<td>3.) Educate and enlist humanity to protect and restore the quality of the natural and human environment.</td>
</tr>
<tr>
<td>4.) Use all lawful means to carry out these objectives.</td>
</tr>
</tbody>
</table>

The following excerpt from the pre-formatted letter provided by the Sierra Club demonstrates the points that Nichols made about the adherence of the Yellowstone grizzly case to the four-fold mission statement: “Given the hard work the American people have invested in restoring the grizzly over the last 30 years, there must be an insurance plan to make sure the success we’ve begun to see endures. The Endangered Species Act can be that safety net, and we the undersigned urge you to keep these important protections in place for the Yellowstone grizzly bear.” Sierra Club

The previous excerpts illustrate how NGO’s who resisted the Yellowstone de-listing decision mistrust federal agencies and their ability to make unbiased, correct decisions regarding species preservation. Interestingly, in examining comments submitted in response to the Yellowstone de-listing, the researcher found at least one NGO which reported having their trust restored as a result of the Fish and Wildlife Service responsiveness to the Endangered Species Act.

The World Wildlife Fund, one of the world’s most recognized and respected environmental NGO’s was the only environmental organization to publicly announce the Yellowstone grizzly de-listing as being evidence of a success story in species preservation. The World Wildlife Fund, for example, urged the Fish and Wildlife Service to continue with the de-listing process by relying on the science to stand up to misleading
environmentalists: “After 25 years of cooperative effort by state and federal managers, Yellowstone’s grizzly bears have recovered to the point where all of the recovery objectives in the recovery plan for the Yellowstone have been met.”

Since the World Wildlife Fund prides itself on relying and acting on sound science it appears that its stance on the Yellowstone grizzly de-listing is one less based in science and more rooted in state governments being able to better management species. Given that a great amount of conflict has surrounded the Endangered Species Act’s effectiveness, the World Wildlife Federation politically was interesting.

The World Wildlife Federation further supported the Yellowstone de-listing ruling and demonstrated a knowledge of scientific sophistication by asking for ecosystem science to be used inclusively with forest management science: “...the Conservation Strategy for management of the habitat following de-listing mandates protection of 6 million acres were developed cannot exceed levels that existed in 1998. It is now time for the grizzly bears in Yellowstone to be managed directly by the state and federal agencies that have achieved the remarkable recovery. The de-listing rule should clearly state that when the grizzly bear is de-listed, the management will be per the state plans.”

It can be assumed that if mistrust plays such a prominent role in the opposition to the Yellowstone grizzly de-listing case, environmental organizations would point to institutions that could be trusted to inform the rulemaking process more fairly. One such institution often referred to was science. In the following section, savvy environmental organizations know how to use or challenge science, when it serves their interest.
The Role of Science

Although supporters of the Yellowstone grizzly de-listing were few, they often pointed to the scientific justification in order to strengthen their argument. The themes generated on scientific basis included the effects of sprawl on the grizzly populations' ability to access key food resources and further isolation of the Yellowstone population from other bear populations. Sprawl also becomes a problem because as human activity infringes on bear habitat the percentage of human-bear interface greatly increases. Logging and road building further exacerbate the grizzlies' ability to access food and continue to further isolate the Yellowstone population from other bear populations. Oil and gas also were noted as destroying grizzly habitat and compromising the integrity of the natural landscape (Interview with Nichols).

As explained earlier the National Wildlife Fund championed a shift in how the Yellowstone grizzly should be managed and they also supported the Fish and Wildlife Service decision to de-list the Yellowstone grizzly on scientific grounds. However, they supported the Fish and Wildlife Service not because scientific evidence showed that the population was safe, but rather, because they felt the rise in the Yellowstone population was a product of good science and a sign of progress.

However, while the National Wildlife Fund backed the science behind the Yellowstone grizzly, the overwhelming majority of environmental organizations questioned the validity and reliability of the science behind the de-listing. Environmental organizations that opposed the ruling often pointed either to scientific evidence demonstrating the risk of de-listing the Yellowstone grizzly prematurely or the lack of scientific evidence demonstrating the grizzly’s safety, as illustrated in the form letter by
the Great Bear Foundation: “Most independent wildlife and conservation biologists suggest that true viability for the lower 48 grizzly populations requires 2-3,000 bears with functional linkages between all 5 Recovery Zones.”

The Great Bear Foundation continued to question the validity of the de-listing science in the following sections of their form letter: “The Fish and Wildlife Service proposal declares Yellowstone a Distinct Population Segment capable of recovery all on its own, with just 600 bears in total isolation from all other Recovery Zones. For the slowest reproducing mammal in North America, this is a recipe for disaster.”

The Great Bear Foundation continues to question the validity of the science behind de-listing the grizzly later in the form letter stating:

“The four key foods supporting Greater Yellowstone Ecosystem grizzlies...are imperiled, yet the proposal and the Forest Plan Amendments suggest such claims are ‘speculative’, or that grizzlies will simply adapt by shifting to other foods. Unfortunately, there are no other foods that in quantity and quality provide the same level of nutrition as these four, and the peril is real...Despite the critical nature of these foods, federal proposals contain only monitoring – no safety net or thresholds to trigger action by providing mitigation or emergency habitat.”

Larry Fahn, a member of an environmental organization, drafted another letter to the Fish and Wildlife Service, highlighting the role of global warming to the de-listing process. Larry Fahn addresses that the Conservation Strategy for the Yellowstone grizzly had not taken the effects of global warming on the Greater Yellowstone Ecosystem into account while drafting the proposal:

While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree’s bark to breed and rear young, killing the tree in the process. Both of these trends will increase as global-warming trends continue.
The Natural Resources Defense Council noted human sprawl across the country and the elimination of grizzly habitat as a means of a larger problem. By referencing that the grizzly, a mammal which requires tremendous space in order to roam has had 99 percent of its previous habitat removed, a sense of urgency is felt from the writing. However, at no point are the numbers given a reference in order to validate how much previous habitat had actually been eliminated: "Grizzly bears...have already been eliminated from 99 percent of their former habitat. Weakening current protections would further fragment and destroy their last remaining home."

Finally, in a form letter from an unknown originator, the issue of habitat fragmentation is further addressed. The 10 individuals who turned in the letter to the Fish and Wildlife Service point out the following points: "Removing the protections of the Endangered Species Act will result in further habitat fragmentation due to increased logging, road building, off-road vehicle use, and oil and gas drilling. Sprawling development threatens to block off any chance of connectivity."

Environmental organizations participating in both sides of the de-listing argument demonstrated an ability to use science toward particular ends – whether pointing out its limitations or asserting its importance. The results are a stalemate, similarly to previous history of environmental regulations. But science itself is seldom sufficiently persuasive to settle arguments in the policy realm. Environmental organizations seem to realize this, as evidence throughout their strategy of critiquing the science on one hand and asserting other important public values on another.
The Role of Values

Environmental organizations frequently highlighted values that were not being taken into account by the proposed Yellowstone grizzly de-listing. By doing this environmental NGO's affiliated with the Yellowstone grizzly case exemplified the natural heritage, historical images about the wilderness experience and the American West. Often, these values were referred to as justification for overlooking scientific evidence that might suggest that the Yellowstone grizzly was sustainable. For example the Natural Resources Defense Council and Sierra Club wrote: “The Yellowstone grizzly bear is an irreplaceable part of America's natural heritage, a symbol of the independence that defines the American character and an icon of all that is free and wild.” The letter goes onto state: “The grizzly bear is a majestic symbol of the American West.”

These quotes exemplify the role of the wilderness in America's national myth as highlighted previously in Chapter 2. Furthermore, as stated in Chapter 3, the Sierra Club purposefully undertook the Yellowstone grizzly case because it fit with the four-fold mission statement of the organization. By including key phrases such as, “icons of America’s natural heritage” and “a symbol of the independence that defines the American character” it can be asserted that NGOs, whether consciously or not, make an effort to include these natural heritage myths into their mission statements in order to carry out their agenda's.

A group of business owners around the Greater Yellowstone Ecosystem organized in order to draft a form letter to the Fish and Wildlife Service which highlighted the grizzly’s tie to business in the area. They highlight that Yellowstone National Park and
the grizzly are integrated into the tourist experience, and that the removal of the bear
threatens rural culture and quality of life in Montana:

As you know, small business in Montana is big business. Like business
across the state, our bottom lines in no small part depend on the clean
water and rugged, natural landscapes in Big Sky Country. Our cash
registers are evidence that a healthy landscape and healthy economy are
closely linked. As residents of the greater Yellowstone region, we have
proven that we can successfully share the bear’s habitat... Colorado,
California, Washington and Oregon all have lovely mountains. But the
opportunity to see a grizzly in the wild is one of the things that make
Yellowstone so special... The region’s abundant wildlife, clean water and
magnificent scenery contribute enormously to the quality of life of our
families.

In addition to such cases of symbolic as opposed to scientific meaning, many
environmental organizations mentioned the importance of considering children, the role
of God and future generations. These comments expressed what grizzly bears mean to
them personally and why the Fish and Wildlife Service should or should not move
forward with the de-listing proposal. Comments often stated their objection to the de-
listing process in the Greater Yellowstone Ecosystem, but are reported by the Fish and
Wildlife Service to “state their objection more generally to their range-wide extinction.”

While no frequency statistics were applied, the researchers maintain that value-based
statements which appear in letters left no doubt that most of the respondents were in
opposition to de-listing the Yellowstone grizzly. The following comments were added in
addition to what environmental organization drafted and all allude to the value of
children, religious writing, human health and the planet relative to the possible financial
gain that some industries would realize as a result of the proposed Yellowstone grizzly
de-listing:

My wife and I want our grandchildren—and yours, too!—to have at least
as much opportunity as we do to enjoy nature and all its varied and
wondrous wildlife all over the world. Fortunately for us, we can afford that kind of travel, but no amount of money can replace what has already disappeared for been destroyed. The world simply cannot afford to lose any more of its marvelous creates or their precious habitat.

Remember that the Book of Genesis requires us to safeguard creation.

...A grizzly bear has significance in and of itself, an intrinsic value that is not manifest simply because humans are witness to it. A grizzly bear has a right to pursue its own good and its own way unrelated to humans.

What must change is our attitude toward nature in general. We must stop our encroachment on all forms of nature and develop our civilization in a more consolidated and ecologically harmonious manner. The pressure to eliminate ‘inconveniences’ such as the Grizzly and other large predators must be reversed and viewed as ‘a point of guidance’, instructing us that we must eliminate our adverse impact on all natural things by changing our goals and methods of civilization.

It is becoming more and more difficult as we humans continue to encroach on their habitat. Our family practiced living with and beside nature without taking more than our share.

God gave us stewardship of the earth, we were not supposed to destroy its creatures.

It is noble to protect grizzlies and it is our moral duty.

This chapter demonstrates that science and values are not always a clear cut issue in the species preservation strategies of NGOs undertook asserting various versions of ecological reality in the Yellowstone grizzly case. Rather scientific knowledge is situated in broader themes and stories about America’s uniqueness and natural identity and America’s ethics and values regarding the wilderness experience. The following chapter will discuss how NGOs use symbolic consensus about natural heritage to participate and overcome obstacles to public participation in disputes on actual environmental decision making.
CHAPTER FOUR

SUMMARY OF THE USE OF SCIENCE, VALUES, TRUST AND HUMAN VALUES BY ENVIRONMENTAL ORGANIZATIONS DURING THE YELLOWSTONE GRIZZLY CASE STUDY

Implications of Public Comment and Environmental Organizations

The Yellowstone grizzly de-listing process offered environmental organizations a platform to provide the general public with a genuine opportunity to engage with the comments and positions on de-listing the Yellowstone grizzly bear. Returning to the ecological-symbolic perspective, the researcher suggests argues that environmental organizations can offer citizens a forum for engaging federal agencies through the public comment process. The Yellowstone case demonstrates the changing role of environmental organizations and public comment in the policy process. With the onset of a more dialogue based discourse, the end results may overcome the adversarial culture of United States rulemaking. Environmental organizations were able to provide a new perspective on the elite driven policy process.

The Yellowstone grizzly case illustrates how a symbolic consensus might emerge. A symbolic consensus on the definition of wildlife, the purpose of the grizzly bear within the Greater Yellowstone Ecosystem and Yellowstone National Park, was strong enough to generate the majority of responses to the Fish and Wildlife Service. The researchers offers the notion that a symbolic consensus already existed regarding the role of the grizzly bear in the scheme of wilderness, but it was used and seemingly strengthened by repetition throughout the public comment process. The public comment process allowed environmental organizations to use the public to insist on this consensus against the
proposed rule. For example, arguing that the removal of the Yellowstone grizzly bear from the Endangered Species Act would jeopardize decades of hard work, and threaten to undo the progress of restoring a symbol of the American West, conflicts with the values underlying what wildlife within National Parks and within Ecosystem Management means to many Americans. As many environmental organizations and citizens suggested, underlying the current symbolic meaning of wildlife and the Yellowstone grizzly is a set of values pertaining to an ethic of environmental stewardship that transcends a strictly scientific determination of what it means of a species to meet Endangered Species Act requirements.

Conclusion

Future research on the role of environmental organizations and public comment on the policy process should continue to use content analysis to examine the use of science, trust, values and symbolic arguments on the part of the public. The crafting of revised rules should also be examined to see if and how symbolic consensus is integrated into new examples of proposed rules. Multiple environmental organizations are in the process of challenging the Fish and Wildlife Service’s decision to de-list the Yellowstone grizzly. Bountiful opportunities to continue the researcher’s work lie in the examination of the use of the public during this process. In the meantime, trust, science and public values will continue to play significant roles in regulatory rulemaking processes.

Governmental agencies and decision makers will continue to perceive the need for science to drive policy and policy implementation. More open public participation processes may bring values to the forefront of the conversation more often. The Yellowstone grizzly case study has provided a clear example where both science and
values were forced to become a part of the dialogue in the rulemaking process. Yet, the
case also demonstrates that environmental organizations will continue to call into
question inconvenient scientific findings or call for more definitive science when existing
evidence provides any question of doubt. Future research should continue to examine the
actual input of the public via environmental organizations on proposed rules for evidence
of the presence of this type of discourse.

The frequency with which the public responded through environmental
organizations in the Yellowstone grizzly de-listing and the likelihood of increases rates of
use in the future raise many further questions. Does public participation through
environmental organizations offer the potential for more wide-spread public involvement,
and a more satisfied citizenry? Would participation through environmental organizations
systematically exclude some segments of the population from participating? What
procedures should federal agencies follow for collecting, analyzing, weighting the
importance of and incorporation value based comments made by citizens? These
questions will take time to examine, and methods will have to include yet also go beyond
the content analysis used in this study.

This research examined how humans simultaneously occupy a symbolic social
world and a real physical reality. Values become fundamental to environmental and
decision making once citizens see their ability to add symbolic meaning to scientifically
understood empirical realities. Open and meaningful public involvement, which
environmental organizations can provide if used reflexively, may hold the potential for a
working out of scientific and value-based positions in a way absent in current rulemaking
processes.
REFERENCES


Cross, C II. (1995) *Go West, Young Man! Horace Greeley’s Vision of America*. Albuquerque, University of New Mexico Press


Glick, D., Carr M., and Harting, B., eds.. *An Environmental Profile of the Greater Yellowstone Ecosystem* (Bozeman: Greater Yellowstone Coalition, 1991), 10.


49


APPENDIX
APPENDIX A

INSTITUTIONAL REVIEW BOARD APPROVAL

University of New Hampshire
Research Conduct and Compliance Services, Office of Sponsored Research
Service Building, 51 College Road, Durham, NH 03824-3585
Fax: 603-862-3564

25-Feb-2008

Platt, Rachel A.
Political Science, Horton SSC
44 New Zealand Road #78
Seabrook, NH 03874

IRB #: 4177
Study: Recovery Policy, the Endangered Species Act, and the Yellowstone Grizzly Bear: A Case Study of the Role and Function of Environmental Organizations
Approval Date: 25-Feb-2008

The Institutional Review Board for the Protection of Human Subjects in Research (IRB) has reviewed and approved the protocol for your study as Exempt as described in Title 45, Code of Federal Regulations (CFR), Part 46, Subsection 101(b). Approval is granted to conduct your study as described in your protocol.

Researchers who conduct studies involving human subjects have responsibilities as outlined in the attached document, Responsibilities of Directors of Research Studies Involving Human Subjects. (This document is also available at http://www.unh.edu/osr/compliance/irb.html.) Please read this document carefully before commencing your work involving human subjects.

Upon completion of your study, please complete the enclosed pink Exempt Study Final Report form and return it to this office along with a report of your findings.

If you have questions or concerns about your study or this approval, please feel free to contact me at 603-862-2003 or Julie.simpson@unh.edu. Please refer to the IRB # above in all correspondence related to this study. The IRB wishes you success with your research.

For the IRB,

Julie F. Simpson
Manager

cc: File
Sowers, Jeannie