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please bring the bears back. When we protect the and their habitat, we protect clean air, clean water, and 18 bears and spaces that we all need, "What's good. bears for the wild good for people."

CENTER for BIOLOGICAL DIVERSITY



March 26, 2015

Karen Taylor-Goodrich Superintendent's Office North Cascades National Park Service Complex 810 State Route 20 Sedro Woolley, WA 98284

Dear Ms. Taylor-Goodrich,

Following are the Center for Biological Diversity's ("the Center") scoping comments regarding options for grizzly bear restoration in the North Cascades ecosystem, as part of the National Park Service's ("NPS") and U.S. Fish and Wildlife Service's ("FWS") (collectively, "the agencies") preparation of the Grizzly Bear Restoration Environmental Impact Statement. The Center is a non-profit conservation organization dedicated to the protection of native species and their habitats through science, policy and environmental law. The Center has more than 500,000 members and supporters dedicated to the protection of endangered species and wild places. The Center has worked for many years to protect imperiled plants and wildlife, including grizzly bears.

Background

Prior to European-American settlement of the American West, grizzly bear roamed through most of western North America, from the high Arctic to the Sierra Madre Occidental of Mexico, and from the coast of California across most of the Great Plains.¹ With settlement came persecution of predators, including the shooting, poisoning, and trapping of grizzly bears

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¹ SERVHEEN, CHRISTOPHER, U.S. FISH AND WILDLIFE SERVICE, GRIZZLY BEAR RECOVERY PLAN 9 (SEPT. 10, 1993) (hereinafter "1993 RECOVERY PLAN").

throughout their range. Although estimates demonstrate the grizzly bear population prior to settlement at 50,000 to 100,000 bears, by the middle of the 20th Century, grizzly bears had been nearly extirpated from the lower 48 States, with their range restricted to less than 2 percent of their historic range. The last known populations were isolated and supported an estimated total of just 800 to 1,000 bears.

As a result of its precipitous decline, FWS listed the grizzly bear in the lower 48 states as a threatened species under the Endangered Species Act ("ESA").² Pursuant to requirements of the ESA, FWS drafted an initial recovery plan for grizzly bears in 1982 and completed a revised recovery plan in 1993. The 1993 Recovery Plan identified six recovery zones for the grizzly bear, including the North Cascades evaluation area, which was identified as an area with "sufficient amounts of quality habitat to warrant grizzly bear recovery in the area."³ FWS, in identifying these recovery zones, noted that recovery in each identified recovery zone must be achieved m and adequate regulatory mechanisms for each recovered population must be in place before FWS can remove the grizzly bear in the lower 48 states from the list of species requiring ESA protection.⁴

In 1997, FWS issued a Supplement Chapter to the 1993 Recovery Plan identifying boundaries and recovery goals for the North Cascades ecosystem.⁵ The 1997 Supplement identified approximately 9,565 square miles within north-central Washington as the North Cascades Grizzly Bear Recovery Zone, noting that it encompasses one of the largest contiguous

² 40 Fed. Reg. 31,374 (July 28, 1975).

³ 1993 RECOVERY PLAN, *supra* note 1, at 13 (citation omitted).

⁴ 1993 RECOVERY PLAN, *supra* note 1, at ii, 33.

⁵ SERVHEEN, CHRISTOPHER, U.S. FISH AND WILDLIFE SERVICE, GRIZZLY BEAR RECOVERY PLAN, SUPPLEMENT: NORTH CASCADES ECOSYSTEM RECOVERY PLAN CHAPTER (JUNE 23, 1997) (hereinafter "1997 SUPPLEMENT").

blocks of Federal land remaining in the lower 48 states.⁶ As identified, the recovery zone includes all of the North Cascades National Park, and most of the Mount Baker-Snoqualmie, Wenatchee and Okanogan national forests.⁷ The zone is ideal for grizzly recovery because about 41% of the recovery zone is within wilderness or the North Cascades National Park and about 72% has no motorized access.⁸

Although historical records reveal that grizzly bears once occupied the North Cascades area, recent estimates predict there may be very few resident bears in the North Cascades now.⁹ Without augmentation of the population through agency action, it is unlikely that this isolated and struggling population would ever recover on its own.

The National Environmental Policy Act

NEPA "is our basic national charter for protection of the environment." 40 C.F.R. § 1500.1(a). NEPA's core precept is simple: look before you leap. 42 U.S.C. § 4332(2)(C)(iii); 40 C.F.R. §§ 1502.2(f),(g), and 1506.1. Under NEPA, each federal agency must take a "hard look" at the impacts of its actions prior to the point of commitment, so that it does not deprive itself of the ability to "foster excellent action." <u>See</u> 40 C.F.R. § 1500.1(c). In this way, "NEPA ensures that the agency will not act on incomplete information, only to regret its decision after it is too late to correct." <u>Marsh v. Oregon Nat. Resources Council</u>, 490 U.S. 360, 371 (1989).

Along these lines, the regulations implementing NEPA require agencies to disclose and analyze the environmental effects of the proposed action. 40 C.F.R. § 1500.1(b). Specifically, "NEPA procedures must ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of

- ⁸ Id.
- ° <u>Id.</u>

⁶ <u>Id.</u> at 1.

⁷ Id.

high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." <u>Id.</u>

NEPA requires federal agencies to prepare an Environmental Impact Statement ("EIS") when a major federal action is proposed that may significantly affect the quality of the environment. 42 U.S.C. § 4332(2)(C); 40 C.F.R. § 1501.4(a)(1). The agencies therefore must consider whether a decision related to augmenting the population of an ESA-listed species in the North Cascades may significantly affect the quality of the environment, and thus whether an EIS is required. Agencies may first prepare an Environmental Analysis ("EA") to determine whether an EIS is necessary.

In developing a proposal, the agencies must identify and analyze a reasonable range of alternatives. CEQ regulations implementing NEPA require that agencies "[r]igorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14(a). The importance of this mandate cannot be downplayed, as a rigorous review of alternatives is considered "the heart of" the environmental analysis. <u>Id.</u> § 1502.14. Furthermore, the agencies must "use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." <u>Id.</u> § 1500.1(e). We propose that the agencies analyze an alternative to augment the grizzly bear population in the North Cascades Recovery Zone through relocation of bears to the area in order to aid recovery of the population. Because grizzlies - albeit few - are present in the North Cascades, all grizzly bears relocated to the area should maintain their listed status as threatened under the ESA and endangered under Washington law. The agencies must use the best available data to determine how many grizzly bears the ecosystem can support and propose actions to reach those identified population goals. As noted in the 1997 Supplement, this will include "an

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intensive research and monitoring effort to determine grizzly bear population size and distribution, habitat use, and home ranges in the NCE.¹⁰ This should not be a one-time effort but an ongoing monitoring process to determine the impacts to the grizzly bear population during augmentation.

In developing recovery goals, the agencies must use the best available science to determine recovery goals that will truly support a viable, self-sustaining grizzly bear population without the need of future human assistance. The agencies must bear in mind the slow reproductive capabilities of grizzly bears and how this impacts population growth, as well as the potential for human-induced mortality (known and unknown) across the ecosystem. Furthermore, given the current lack of connectivity with other grizzly bear populations, the agencies must determine how to deal with any future genetic depression that may arise. In order to decrease the potential for genetic depression, areas between the North Cascades ecosystem and the Selkirk Mountains and British Columbia Coast Range should be evaluated for management as necessary connectivity corridors to support dispersal of grizzly bears. And at this early stage, the agencies should make suggestions as to what adequate regulatory mechanisms should be put in place to ensure recovery goals, once met, are maintained.

Furthermore, through an EA or EIS, the agencies must consider both direct and indirect environmental impacts of the proposed action. 40 C.F.R. § 1508.8. Direct effects are caused by the action and occur at the same time and place as the proposed project. <u>Id.</u> § 1508.8(a). Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. <u>Id.</u> § 1508.8(b). Agencies must also analyze cumulative impacts. A cumulative impact is "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions

¹⁰ 1997 SUPPLEMENT, *supra* note 5, at 4.

regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." <u>Id.</u> § 1508.7.

For example, there are many ecosystem benefits derived from the presence of grizzly bears that the agencies must consider. For example, FWS has recognized that as an umbrella species, the grizzly bear has a habitat range that will encompass a variety of other species.¹¹ In fact, the grizzly has one of the largest average home ranges of any land mammal species and occupies and utilizes a wide variety of habitats, including alpine and subalpine areas, riparian zones, and valleys.¹² At one time the grizzly bear likely inhabited all lands in the west save the dry, arid deserts. For this reason, management of grizzly bear habitat may offer benefits to other flora and fauna species, facilitating protection of a biologically diverse ecosystem in the North Cascades.¹³ A lot of recent science has also noted the importance of apex predators such as grizzly bears and the ecosystem benefits of trophic cascades that occur with the presence of apex predators.¹⁴ The agencies should analyze these impacts as part of the NEPA process.

The agencies must also consider the impacts to grizzlies bears from social perceptions and how the augmentation of the grizzly bear population may influence and be influenced by social tolerance. Importantly, recent research shows that allowing individuals to remove

¹¹ 1993 RECOVERY PLAN, supra note 1, at 28.

¹² <u>Id.</u>

 $^{^{13}}$ <u>Id.</u>

¹⁴ See, e.g., BESCHTA, ROBERT & WILLIAM RIPPLE, LARGE PREDATORS AND TROPHIC CASCADES IN TERRESTRIAL ECOSYSTEMS OF THE WESTERN UNITED STATES, BIOLOGICAL CONSERVATION (2009) (ATTACHMENT 1); ESTES, JAMES A. ET AL., TROPHIC DOWNGRADING OF PLANET EARTH, 333 SCIENCE 301-306 (JULY 14, 2011) (ATTACHMENT 2); ORDIZ, ANDRES ET AL., SAVING LARGE CARNIVORES, BUT LOSING THE APEX PREDATOR?, 168 BIOLOGICAL CONSERVATION 128-133 (2013) (ATTACHMENT 3); RIPPLE, WILLIAM ET AL., STATUS AND ECOLOGICAL EFFECTS OF THE WORLD'S LARGEST CARNIVORES, 343 SCIENCE 1241484 (JANUARY 10, 2014) (ATTACHMENT 4); STRICKLAND, MICHAEL ET AL., TROPHIC CASCADE ALTERS ECOSYSTEM CARBON EXCHANGE, 110 PNAS 27, AT 11035-11038 (JULY 2, 2013) (ATTACHMENT 5).

predators from the landscape does not actually increase social tolerance, as once thought.¹⁵ The agencies therefore must consider the best available science in maintaining and increasing social tolerance for this important umbrella species, including methods to increase education on the importance of predators in maintaining a healthy ecosystem.

Additionally, the agencies must analyze the potential for human-induced mortality, and measures to minimize such mortality. This includes poaching, mistaken identity killings by hunters, road kills, and predator control efforts to benefit livestock operations, as undertaken by the state, federal agencies, or individuals. In connection with these considerations, the agencies should identify measures to minimize human-bear conflicts as the grizzly population increases and expands. Such efforts may include food storage orders, garbage management directives, limited road construction and use, reduced or removed grazing in grizzly bear habitat and associated directives to remove dead livestock that may attract bears in a timely manner, reduction or removal of trapping in the recovery zone, increased outfitter and hunter education to identify grizzly bears, and timely removal of gut piles following ungulate hunting that may attract grizzly bears to conflict areas. Similarly, black bear baiting and hound hunting of black bear baiting, as historically practiced in Washington, is inconsistent with sanitation goals for a grizzly bear recovery zone.¹⁶

Although these scoping comments focus mainly on the agencies' duties to comply with NEPA, in addition to complying with NEPA the agencies must comply with all applicable provisions of the ESA, the National Forest Management Act, the Wilderness Act, the Clean

¹⁵ <u>See, e.g.</u>, BROWNE-NUñEZ, C. ET AL., TOLERANCE OF WOLVES IN WISCONSIN: A MIXED-METHODS EXAMINATION OF POLICY EFFECTS ON ATTITUDES AND BEHAVIORAL INCLINATIONS, BIOLOGICAL CONSERVATOIN (2015) (ATTACHMENT 6).

¹⁶ 1997 SUPPLEMENT, supra note 5, at 14.

Water Act, and any other laws that may be implicated in proposing actions to augment the grizzly population.

As a final note, I would like to note that the FWS and NPS have unduly limited the opportunity for comment on this scoping process, a limitation that must be remedied going forward. In a background document discussing opportunities and methods for submitting comments, the agencies note that "[b]ulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted."¹⁷ The agencies are aware that several organizations such as the Center routinely provide an opportunity for members to submit comments through our organization in order to streamline what may otherwise be considered a complicated process by some members of the public. NEPA requires the agencies to facilitate public comment opportunities, not constrain them. By refusing to accept bulk comments, the agencies are unduly restricting the ability of many members of the public to allow organizations such as the Center to help collect and submit comments on their behalf. We strongly submit that the agencies must accept bulk comments going forward and must be open to every avenue of comment submissions on behalf of interested members of the public. To do otherwise will unduly constrain NEPA and abrogate its goal of transparency through a public process.

Sincerely,

Andrea Santarsiere

Andrea Santarsiere Staff Attorney Center for Biological Diversity

¹⁷ U.S. FISH AND WILDLIFE SERVICE & NATIONAL PARK SERVICE, NORTH CASCADES ECOSYSTEM GRIZZLY BEAR RESTORATION PLAN/ENVIRONMENTAL IMPACT STATEMENT, located at https://parkplanning.nps.gov/document.cfm?parkID=327&projectID=44144&documentID=64266 (last visited March 25, 2015) (Attachment 7).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10 1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

OFFICE OF ECOSYSTEMS, TRIBAL AND PUBLIC AFFAIRS

March 26, 2015

Ms. Karen Taylor-Goodrich, Superintendent North Cascades National Park Service Complex 810 State Route 20 Sedro-Woolley, Washington 98284

Dear Ms. Taylor-Goodrich:

The U.S. Environmental Protection Agency has reviewed the Federal Register Notice of Intent to prepare the North Cascades Ecosystem Grizzly Bear Restoration Plan/Environmental Impact Statement, Washington (EPA Region 10 Project Number 15-0031-NPS). We are submitting scoping comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We appreciate you involving us in this proposed action.

The NPS and USFWS, as co-lead agencies, are proposing a plan to restore the grizzly bear, listed as threatened under the Endangered Species Act in the lower 48 states, to the North Cascades Ecosystem, which is a portion of its historic range. In addition to supporting grizzly bear recovery and ESA de-listing, the stated need for this action also includes avoiding permanent loss of grizzly bears in the NCE¹, and contributing to biodiversity restoration for current and future human benefit and enjoyment.

According to the NOI, preliminary alternatives include the no action alternative, and active restoration alternatives, including moving grizzly bears from other U.S. and/or Canadian populations into the NCE, as either a threatened or an experimental population under the ESA. Issues for analysis in the EIS would include:

- Rare or unusual vegetation
- Wildlife and habitat
- Soundscapes
- Wilderness (including a minimum requirements analysis)
- Visitor use and experience
- Socioeconomics
- Human safety, and
- Other resources.

We support these issues for analysis in the EIS. We offer comments regarding the preliminary range of alternatives, as well as additional issues for evaluation, below.

¹ There has only been one observation of a solitary bear during the past 10 years.

Alternatives

In addition to the no action alternative, we support inclusion of the action alternative to restore grizzlies as a threatened population. However, we are concerned that the restoration alternative using a nonessential experimental population would not provide adequate protection for transplanted bears. Unlike the other four grizzly bear recovery zones, the NCE borders a large metropolitan population zone, essentially continuous from Vancouver, B.C. to Olympia, WA. None of the other grizzly bear recovery zones is accessible to such a large and diverse human population. It is possible that grizzlies transplanted to the NCE would be at greater risk of human contact and the associated potential for conflict, poaching or other illegal exploitation. Would "source" bear populations be of sufficient number and resilience to weather potential loss if managed as an experimental population? We recommend that these aspects be taken into account in the analysis of alternatives.

We also recommend the following additional issues for analysis in the EIS:

- The potential effects and results of passive vs. active restoration;
- Effects to source populations of grizzlies;
- Effects of or overlap with legal trapping and hunting of wildlife in the NCE;
- Effects of potential poaching and other illegal exploitation for human uses;
- Effects on other wildlife species and populations in the NCE;
- Effects of travel corridors, including railways, highways, other roads, and motorized and nonmotorized trails, and potential need for safe wildlife crossing structures and fencing/barriers to prevent entry onto roadways and railways (see additional comments on ecological connectivity below);
- The potential effects of future ESA de-listing of grizzlies.

Ecological connectivity

Three major highways bisect the NCE in Washington: SR 20/North Cascades Highway, US 2/Stevens Pass Highway, and I-90/Snoqualmie Pass Highway. Railways are also present over Stevens Pass and Snoqualmie Pass, and there are many other roadways, trails, power transmission lines and other utility rights-of-way throughout the NCE. Providing for ecological connectivity and the means to ensure safe passage in the landscape for wide-ranging grizzly bears is an important need that should be considered prior to introducing new bears in the NCE. Fortunately, this need is presently being addressed within the I-90 corridor via the Snoqualmie Pass East project. Wildlife crossing structures² and associated fencing to prevent entry onto the roadway and to funnel wildlife to safe crossing structures are currently under construction in the I-90 corridor. Similar structures should be considered to prevent wildlife-vehicular collisions on the other major roadway and railway corridors.

Roadways may act either as a high-risk mortality sink for grizzlies or as a barrier, causing avoidance behavior. Railways, on the other hand, often attract them. For example, spilled grain from freight trains provides an attractive food source for wildlife. Animals killed by trains while feeding become a food source for other animals, who then become vulnerable to injury by trains. Grizzlies would be attracted

² Wildlife crossing structures that would accommodate large mammals include underpasses (such as, enlarged bridges or culverts) and overpasses. Research indicates that grizzly bears prefer overpasses (http://www.citylab.com/commute/2013/08/inside-dramatic-world-transportation-planning-bears/6487/).

in either case. When trains are not present, railways provide a relatively convenient travel corridor for some species (including grizzlies), particularly where railway bridges, trestles, or tunnels facilitate movement across challenging topography, such as deep ravines, canyons, mountains, and water bodies and/or where the railway provides a cleared pathway, such as through dense vegetation or deep snow. In such cases, railways can become an attractant and mortality sink. The number and frequency of trains is increasing dramatically due to fossil fuel shipments and global trade and may intensify in the future. The frequency and speed of passenger rail is also rising.

We appreciate the opportunity to participate in the scoping process for the Grizzly Bear Restoration Plan and EIS. If you have questions or would like to discuss these comments, please contact me at (206) 553-2966 or via electronic mail at somers.elaine@epa.gov.

Sincerely,

Elaine L. Somers Environmental Review and Sediment Management Unit

Comments regarding the NCE Grizzly Bear Restoration Plan/EIS: Correspondence ID 2820

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Comments regarding the NCE Grizzly Bear Restoration Plan/EIS: Correspondence ID 2821

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Correspondence ID 2822

I grizzle bears in the vicovery he the Nat and NOND apor with this vectorey process. forward will complete - My wild and ane D: the Nor th Cascades. A 10 20 Scoping period and as consideraft the 101 Statement please consid nvivonmental ev Import fervet ide p Vansloc leas TUSA Col NC ha I would Into the ecosystem. 00 like for a bears piritual appect + Mpor ne tonce tura T They are notive On here Dears them out DUSM and we now have a MM to recover and renew then presence 15161 22 60 GR Your Name: Mailing or email address: _ Seattle WA 98115 Organization (if applicable): (circle one) Official Representative Member

The Methow Valley Citizens' Council

Board of Directors	March 12, 2015
Maggie Coon	
Chair	Superintendent Karen Taylor-Goodrich
	North Cascades National Park Service Complex
Phil Millam	810 State Route 20
Vice Chair	
	Sedro-Woolley, WA 98284
Kari Bown	
Secretary	Re: Grizzly Bear Recovery Plan EIS Scoping Comments
5	
Peter Morgan	
Treasurer	Dear Superintendent Taylor-Goodrich,
I TENSATET	
John Crandall	I am writing on behalf of the Methow Valley Citizens' Council (MVCC), a
John Olson	conservation organization based in the Methow Valley, Okanogan County,
Melanie Rowland	-
	Washington. We support recovery of grizzly bears in the North Cascades
George Wooten	Ecosystem (NCE). We are pleased that development of an environmental
	impact statement (EIS) to identify how best to recover bears has begun.
PO Box 774	
Twisp, WA 98856	The mission of MVCC is to raise a strong community voice for protection of
<u>www.mvcitizens.org</u>	the Methow Valley's natural environment and rural character. One of our
(509) 997 - 0888	•
	priorities is to maintain and strengthen regulatory protection of the valley's
	native wildlife. Grizzly bears are a keystone native species in the NCE.

We fully support the purpose, need, and objectives of the EIS for grizzly bear recovery. Restoring a healthy North Cascades grizzly bear population is important to the resilience of the species, especially in light of climate change. As you are aware, the NCE is the only Grizzly Bear Recovery Zone outside the Northern Rocky Mountains. It is the second largest of the six recovery zones, and it comprises 96% public land, with approximately 40% in national park or designated wilderness area and 70% with no motorized access. The habitat supports a large number of black bears and provides highly suitable habitat for grizzly bears. Consequently, it is an ideal area for grizzly bear recovery.

With regard to selection of alternatives and preparation of the EIS, we consider the following to be of greatest importance:

- Use of the best available science to craft strategies to restore a viable population of grizzly bears in the NCE.
- The best available science at this time indicates that due to the low number of grizzly bears in the NCE, their low reproductive rate, and the absence of bears in adjacent areas, augmentation of the bear population will likely be necessary to recover the population. The EIS must include one or more alternatives that include augmentation.

The Methow Valley Citizens' Council

Augmentation has been used successfully in Montana's Cabinet-Yaak Ecosystem, and it must be seriously considered in NCE grizzly bear recovery.

• We urge you to follow the science and to include in all EIS alternatives public education to reduce opposition to recovery of the grizzly bear in the NCE.

Thank you for consideration of our views. Sincerely,

Maggie B. Coon

Maggie Coon Chair, Methow Valley Citizens Council

Correspondence ID 2824 Comments regarding the NCE Grizzly Bear Restoration Plan/EIS: 00 400 41 DU cin. 10 è Qu 00 nor C a ion cern Î Gre m 04 environa to G Wond 6 area C 9 0 an Your Name: Mailing or email address: Sumned 98390 u)a Organization (if applicable): (circle one) Official Representative . Member

Correspondence ID 2825

n o DCAL 1LATIDO ever Unu ecisio 0 0 Q. 0 15 100,000 103C lou LW CAO 0 0 11e N P 0 C 128 Your Name: Mailing or email address. WA The Slow Organization (if applicable):_ DWU Official Representative (circle one) Member





North Cascades Grizzly Bear Recovery Comments

Statement in Support of Recovery as the Goal from Conservation Northwest and Washington State Chapter of the Sierra Club.

On behalf of our staff, Directors and over 5,000 members and supporters, Conservation Northwest unequivocally supports the restoration of grizzly bears to the North Cascades Grizzly Bear Recovery Zone. We also want to express our appreciation to the National Park Service, US Fish and Wildlife Service, US Forest Service and Washington Department of Fish & Wildlife for initiating the recovery process through NEPA and for the professionalism of the scoping process.

The Sierra Club strongly supports restoration of the grizzly within the North Cascades Grizzly Bear Recovery Zone. Our 2.4 million members and supporters (24,000 in Washington State) believe in our mission to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. It is clear that the effort to support grizzly recovery falls directly in line with our mission and our vision for the North Cascades ecosystem. We join Conservation Northwest and support these comments and thank the agencies for their painstaking effort to safeguard our wild lands, waters, and wildlife.

Conservation Northwest has been the foremost advocate for grizzly bears and their recovery in the Pacific Northwest since 1988 when the group was formed as Greater Ecosystem Alliance. Since then our staff, Board of Directors and members have been unwavering in support of restoring grizzly bears to Washington and the North Cascades. We are now working in coalition with colleagues in British Columbia, including First Nations to ensure that grizzly bears maintain their current range in southern BC despite declining numbers (in some population units) and increasing threats to their habitat.

The Sierra Club has a formidable record of protecting wild places, advocating for imperiled species, and participating in processes large and small that impact America's public lands. Our staff members and volunteers have worked to elect environmental champions and pass countless laws to protect species, like the grizzly. Our Washington State Sierra Club Chapter remains absolutely dedicated to the ecosystems across Washington State and looks forward to the opportunity to work with the agencies and other stakeholders as we chart a course for grizzly recovery.

Grizzly bear recovery on a reasonable timeframe in the North Cascades must be the ultimate goal. It seems apparent that after more than 50 years of languishing at precipitously low numbers, North Cascades grizzly bears will not recover on their own and through natural immigration from neighboring

populations. It is well-known that the nearest grizzly bear populations in BC are themselves threatened by low numbers stemming from the direct and indirect effects of habitat fragmentation.

Therefore we believe that the best strategy, indeed the only strategy for maintaining and restoring grizzly bears in the Cascades is to actively reestablish an upward trending population in the US North Cascades while working cooperatively with the British Columbia government, biologists and ENGOs to reverse grizzly bear declines in southwest BC. We can realize the recovery goal by transplanting a modest number of bears over several years into the US North Cascades. Such recovery strategies must be reinforced with comprehensive outreach and education about living with grizzly bears and the privilege and benefits that grizzly bear presence affords the people and wild areas of our region.

Therefore Conservation Northwest and the Sierra Club support the inclusion of bear transplants options into the North Cascades Grizzly Bear Recovery Zone in the Draft EIS. We will consider supporting any bear augmentation alternative that is in the best interests of the bears and has the best chance of public support and the subsequent success of recovery efforts.

Issues to consider in the Draft EIS

Over the course of the past two plus decades advocating for grizzly bear recovery in the North Cascades it has become apparent to us that there is a great deal of local, regional and national support for restoring grizzly bears in the North Cascades ecosystem. However, it also seems apparent that there are many questions about what grizzly bear recovery actually means for those who regularly frequent the North Cascades backcountry and residents of local communities who may eventually interact with a recovered grizzly bear population. We believe it is important to answer these questions as thoroughly and as clearly as possible to ensure the success of grizzly recovery efforts. Moreover, we maintain that providing clear, accurate information and the rationales for recovering grizzly bears in NW Washington will only enhance public support for recovery.

Therefore we urge the recovery team to consider the following issues in the Draft EIS:

- 1. Ecological importance and ecosystem benefits of restoring a viable population of grizzly bears to the NCE
- 2. Natural and regional history of grizzly bears and reasons for their decline
- 3. Cultural underpinnings and importance to Native Americans
- 4. Economic benefits to communities around the GBRZ
- 5. Likelihood of natural recolonization and status of nearest grizzly bear populations including connectivity to other grizzly bear populations
- 6. Potential impacts to/benefits for ungulate populations
- 7. Potential impacts to livestock industry
- 8. Impacts/benefits for recreation and potential effects of grizzly bear recovery on recreation access
- 9. Human safety and coexistence with grizzly bears with an emphasis on ecosystems with more grizzly bears
- 10. Current and future land management direction in the GBRZ (road density standards, trial construction and maintenance as may be affected by recovery actions)
- 11. Analysis of all the various elements (e.g. aquatics, economics, etc) that currently factor into the management of motorized access and road closure/maintenance in the GBRZ currently and as recovery proceeds.
- 12. Estimated time to recovery under most pro-active options (most applicable bear transplant options).

We don't pretend to speak for Native Americans, but it's worth noting that Grizzly bears enjoy an exalted place in tribal cultures because such status indicates how important grizzlies are to the regional ecological fabric. And, intact ecologies underpin intact indigenous North American cultures. Among other things, Native Americans and First Nations in British Columbia have viewed grizzly bears as critical to the maintenance of their cultural moorings because of the extensive overlap in the food sources of people and bears. As well, grizzly bears are viewed as creatures of strength, courage, wisdom and interpreters of dreams. Given these ancient connections is it not safe to assume that grizzly bears were seen as indicators of functioning ecosystems and umbrellas for human values long before modern science made those connections?

All native species are ecologically significant. And when human impacts have caused or hastened their demise it is ethically imperative that we do all that we can to restore them to their rightful place on the landscape if habitat still exists or can be reasonable restored. Grizzly bears are no different. But they may be even more important to recover given the limited recovery opportunities nationally because of human habitat impacts, including connectivity between existing bear populations.

In the bigger picture it seems intuitive that reestablishing grizzly bear presence on the west coast in the Cascades is one of the most important conservation actions we can undertake for the species in the lower 48 states and regionally. All our grizzly bear eggs, so to speak currently rest in the Rocky Mountains and, given the pace and potential impacts of climate change, such a strategy does not seem sound, whether by intent or not. If we are to promote the resilience of the species and our treasured, but limited wild landscapes, it is important that grizzly bears and all native species are restored to their former ranges where possible. As well, recovering grizzly bears can potentially contribute to greater regional resilience to climate change, given the bears' need for landscape scale connectivity and its use of such a wide variety of habitats.

And to put this issue in proper perspective, recovering grizzly bears in all 6 GBRZs will still only equate to reclaiming roughly 4% of their former range in the contiguous US.

Restoring grizzly bears to the North Cascades is the right thing to do – from any perspective – not the least of which is because of the intrinsic value of the grizzly bear and to restore its rightful place in the Pacific Northwest and the North Cascades Ecosystem.

Respectfully,

Joe Scott International Programs Director Conservation Northwest

Morgie Van Cleve

Margie Van Cleve Washington State Chapter Chair Sierra Club

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Comments regarding the NC	CE Grizzly Bear Re	storation Plan/EIS:	Correspondence ID 2836

RCW 77.12.035 SAYS NO GRIZZLEY BEARS SHAll BE TRANSPLANTED OR INTRODUCED INTO the STATE. ONLY GRIZZLY BEARS that are NATION TO the STATE OF WAShing Ton MAY BE UTILIZED By DEPARTMENTS FOR MANAGEMENT progRAMS. This is A fool's fully Due To the fact for HUNTERS, Fisherman HIKERS AND CAMPERS WITHIN The CASCADE MOUNTAIN REGION those who DO NOT KNOW EVEN What A GRIZZLY LOOKS LIKE ALC PLACED IN GRAVE DANGER When CONFRONTED BY BEARS IN GENERAL, GRIZZLYS IN PARTICULAR. Please keep me informed as to when the wirt meeting of planners & the public are scheduled. Your Name: Mailing or email address: RENTON WA F8054 Organization (if applicable):_ Member Official Representative (circle one)

Correspondence ID 2838 Comments regarding the NCE Grizzly Bear Restoration Plan/EIS: The Grizzly Bur is in fire straits in the #8 configueous States. Svery affort should be made to engage in active estoration in the North Coscales. Endangerd Species Act listing as "endowgered", should be tollen as a call he clus action. The piologists of the NPS phough ad vise as to what are the connect financed riginants of recovery. Coretal co-ortination should also take place with Conche and with its province, British Columbia in the goal at Grizely Bier presury in the North Ciscetes Ecosystem. Notion Pork Skrvice should mall the Grizzly Bun recover, a high priority is the federal budget. Recovery should be confully monitored Get public reports, filly transportant in noture, should be issued privatically, he fully support the Nukonal Pork Service in the god of pursuing brizzly Bion prevery. cont, wr. Your Name: WA 98403 2000 Mailing or email add Organization (if applicable): (circle one) Official Representative Member

It Support The restoration of grizzly bears in the North Cascades. To me, animals & their habitats are of vory high importance. It's also important to educate the public against unwarranted fears & help people behave appropriately for the safety of humans and wild life. Your Name: Mailing or email address: Seattle WA 98119 Organization (if applicable):___ Member Official Representative (circle one)

AND I OWN PROPERTY 2 MILES WIFE MY OF MARBLEMOUNT IN SKAGIT NORTH COUNTY. NCHP IS RIGHT NEXT DOOR, AND DO A GREAT DEAL OF HIKING WE ARE FULLY SUPPORTIVE OF THRE. ACTION TO RESTORE GRIZZLY TAKING to THE NORTH CASCADES WHETHER BEARS ADSPICES OF A THREATENED DRIDER POPULATION UNDER THE ESA, OR AS POPULATION, HEI WE DO UNDERSTAND THE DOWNSIDES FOR US FROM POSSIBLE CLOSED TRAILS TO ASSOCIATED WITH RESTORATION NONE EXPOSURE TO BEAR HAZARD. TP RESTORATION OF THESE UPSIDE ANIMALS TO THE COUNTRY MAGNIFICENT PREMIER WILDERNESS, FAR ONTHEIGHS THE POTENT, AL RISKS. FULL SPEED PHEAD, HPS = USFIL Your Name: Mailing or email address: Organization (if applicable):____ Official Representative (circle one) Member

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an definitely FOR seinteduction of the Gringly, I think it would acusably enhance the unliterness experience of North Cascadas been reinticoliced to an area before I would bears have a lat of research done (which I know happens with hope to see interductions). But there will be many efter eyes on this reinterduction, with failure greatly influencing the winkillity of recutioduction efforte would also hope that the entire process is very apen the to the public: WSFW, I thinks, has gotten themselves into tooulile on bath side the wh wolf issue, to longely due to lack of communication; not haveing a completely open process. Of course, workers are highly political, but I think with any species sentiochection affort, open and housest information is cutical to the process of finding an acceptory publi Thank you for holding this event, Needed a begin woon though This place is packed, Your Name: Mailing or email address: Organization (if applicable):_ Member Official Representative (circle one)

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3/24/15 Comments regarding the NCE Grizzly Bear Restoration Plan/EIS: Corr ID 2848 To the Superindent of North Caucades Park Service: pear Sir; I am sursiting in response to the well articulated letter published in the featule Times of funday March 22 uritten by Rob Smith At is certainly understandable that there is a strong desire to return this part of the ecosystem to a time when griggly hears soamed there and played Their part in maintaining the balance of mature It surely must be a naturalist's dream. However, it really seems to be a mesqueded dream for those who treasure their profimity to this wonderful natural environment so close to home, Civilination has already encroached and as my Grandmother would have said, "the horse has already left the barn!" _ Wanting to partake of a wilderness area practically in our backyards and wanting to introduce our children to it in hopes they too will develop a reverence for the natural world, it seems inconqueous that serious consideration is being given To the reintroduction of a majertic but unpredictable predator such as the grupply Cohalictation by this animal and humans is unworkable (in the end, after much pain for all, the gringlies will suffer & several generation of potential authorsmen will remain unacquainted with what is still a prestine welderness, Please reconsider - Sincerely, Synttle Petre Your Name: <u>Lynette</u> Petrie Mailing or email address: Organization (if applicable): <u>Matuu Conservancy - NPCA</u> (circle one) Member Official Representative



March 24, 2015

Superintendent Karen Taylor-Goodrich North Cascades National Park Service Complex 810 State Route 20 Sedro-Woolley, WA 98284

Dear Superintendent Taylor-Goodrich,

I appreciate the opportunity to submit the following comments on behalf of the Natural Resources Defense Council ("NRDC") and our Members and Activists during the scoping period for the North Cascades Ecosystem Grizzly Bear Restoration Plan & Environmental Impact Statement ("NCE Grizzly Bear Restoration Plan & EIS").

NRDC is a national conservation organization with over 1.4 million Members and Online Activists, including over 38,000 Members and Online Activists in the State of Washington. I request that this letter be included in the official comment record for the scoping period for the NCE Grizzly Bear Restoration Plan & EIS.

Simply put, we strongly support the recovery of the grizzly bear in the North Cascades Ecosystem. NRDC has long advocated for grizzly bear conservation and recovery in the Lower 48, and a robust North Cascades population is critical to the recovery and long-term viability of grizzly bears south of Canada.

Going forward, we urge the recovery coordinating agencies to take into full consideration the ecological, biological, cultural, spiritual and economic importance of grizzly bears to the Pacific Northwest. As the only Grizzly Bear Recovery Zone outside the greater Rocky Mountains, restoring a healthy North Cascades grizzly bear population is important to the resilience of the species in general, particularly in light of climate change.

Quality habitat still exists for grizzly bears in the North Cascades Ecosystem. As such, we have an ethical and legal obligation to restore a

NATURAL RESOURCES DEFENSE COUNCIL

317 E MENDENHALL STREET | SUITE D | BOZEMAN, MT | 59715 | T 406.556.9300 / F 406.404.1909 | NRDC.ORG

healthy grizzly bear population to the North Cascades. There is also strong public support for grizzly bear recovery in the North Cascades that transcends geographic and demographic lines.

We urge you to use the best available science to identify and implement active strategies to restore a viable population of grizzly bears in the North Cascades Grizzly Bear Recovery Zone.

We thank the National Park Service, the U.S. Fish & Wildlife Service, and the Washington Department of Fish & Wildlife for moving forward with the restoration of the grizzly bear in the North Cascades Ecosystem, and we look forward to engaging in the process in the months and years ahead.

Sincerely,

Matt Skoglund Director, NRDC Northern Rockies Office



OKANAGAN NATION ALLIANCE

101 - 3535 Old Okanagan Hwy, Westbank, BC V4T 3L7 Phone 250-707-0095 Toll Free 1-866-662-9609 Fax 250-707-0166 www.syilx.org

TRIBAL COUNCIL RESOLUTION

2014/15 No. 292 Governance

Ki?lawna? Recovery & Coast to Cascades Grizzly Bear Initiative November 28, 2014

- WHEREAS: Ki?lawna? has been an integral and critical part of Syilx culture since time immemorial—its presence in Syilx Territory is an indicator of the health of Syilx land and people; and,
- WHEREAS: At least three remnant trans-boundary grizzly bear populations within Syilx Territory need immediate action to assist them from disappearing due to low numbers and habitat isolation; and,
- WHEREAS: The Natural Resources Council (NRC) has recommended that the Chiefs Executive Council (CEC) direct Okanagan Nation Alliance (ONA) staff to develop and undertake activities to assist Ki?lawna? recovery and protection.
- WHEREAS: The NRC will provide guidance to ONA staff to ensure that our Ki?lawna? is protected and recovered in ways consistent with our culture, traditional knowledge, values, laws and customs; and,
- WHEREAS: Supportive relationships with other Nations, governments and organizations are needed to ensure that Ki?lawna? will remain, occupy and thrive in its traditional areas for all time; and,
- WHEREAS: Collaborative management processes will help demonstrate Syilx presence and responsibility for the land and resources, and provide capacity to help position the ONA and its member communities as leaders in wildlife conservation; and,

THEREFORE BE IT RESOLVED THAT:

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- 1. The CEC declares that Ki?lawna? is at-risk and protected within Syilx Territory.
- 2. That Grizzly Bear Population Recovery and management is a Syilx priority to ensure that Ki?lawna? will remain, occupy and thrive in its traditional areas for all time.
- 3. That ONA staff, under NRC direction, will gather traditional knowledge and practices, and work to build the supportive relationships and projects needed to help Ki?lawna? survive and recover throughout Syilx Territory using best available information, practices and scientific knowledge balanced with our Traditional knowledge and

- 4. That the ONA supports the *Coast to Cascades Grizzly Bear Initiative* and will join with that group to further Ki?lawna? population recovery and habitat connectivity in southwest BC, Okanagan Territory; and
- THEREFORE BE IT FURTHER RESOLVED THAT: The CEC encourages neighboring Nations and other First Nation organizations to join in the effort to sustain Ki?lawna? Grizzly Bear; and,
- FINALLY BE IT FINALLY RESOLVED THAT: The CEC call upon the Province of British Columbia, the Government of Canada, the State of Washington, and the United States Government to act promptly and effectively to implement cooperative actions for protection of Grizzly Bear and recovery of threatened Grizzly Bear populations in southern British Columbia and the northern United States.

Ki law Ma Chief Clarence Louie Osoyoos Indian Band

Ng as multur Chief Jonathan Krug

Penticton Indian Band

Chief Harvey McLeod Upper Nicola Indian Band

Chief Charlotte Mitchell Upper Similkameen Indian Band

Sime Chief Røbert Louie

Westbank First Nation

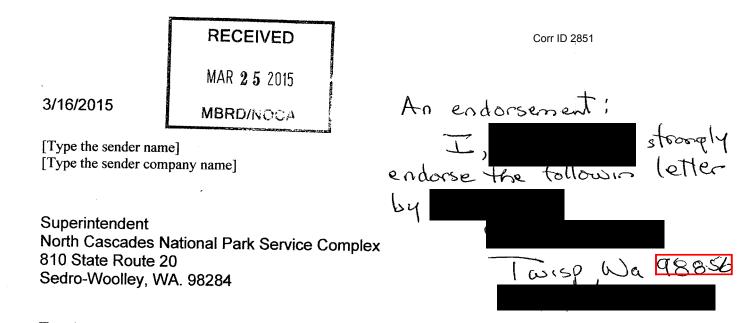
La Milingata Circuit C

Kal Nupagn Chief Keith Crow Lower Similkameen Indian Band

Chief Byron Louis Okanagan Indian Band

Chairman Jim Boyd Colville Confederated Tribes

Quorum 4



To whom it may concern;

After reading the Grizzly Bear Recovery Plan with supplements dated 6-23-1997, I have these concerns and views. As an adult with 50+ years of hiking, hunting and enjoying the Okanogan County region from the Canadian border south to Wenatchee. I feel the Recovery Plan is far from usable at this time. The plans own statements of lack of information for the ecosystem in itself shows more time is needed before reasonable judgements are made.

In the North Cascades the plan shows from the stats listed that Grizzly bears that are claimed to be here have not grown in numbers. Why then if the bears have not been killed off since the listed last killing of 1967 there are not more? After a 48 year time period, the normal reproduction rate should show considerable more. The answer is habitat and or food. The research from the Methow Valley shows trappers only listed fur from Black bears. These records are from 1880's.

The plan lists 200-400 bears to be possibly introduced in the North Cascades. We know bears reach out to the easiest food source. The current cattle ranchers, sheep herders, horse breeders and small communities will be greatly affected. The Recovery plan states possible changes, reduce or even stop cattle ranchers, timber harvests, mining, recreation, water development and energy development etc. as stated in NC132 must not be considered at all costs. The Methow Valley has no commercial business employing vast amounts of people. We only have tourists, hundreds of vacation homes with families and a farming community which is cattle driven. Any one of these reduced or removed would greatly affect the economy. Okanogan county already has one of the highest unemployment rates in the state. Why does the Recovery plan not have a plan for losses due to the Grizzly bear in anyone of the areas listed in NC132?

How does the U.S. Fish & Wildlife plan to address the lack of funds listed in the Washington State RCW 77.12.035. No funds mean NO help from any state agency. The RCW states. The commission shall protect Grizzly bears and develop management programs on publicly owned lands that will encourage the natural regeneration of Grizzly bears in areas with suitable habitat. Grizzly bears shall not be transplanted or introduced into the state. Only Grizzly bears that are native to Washington state may be utilized by the department for management programs. The department is directed to fully participate in all discussions and negotiations with the federal and state agencies

relating to the grizzle bear management and shall fully communicate, support and implement the policies of this section.

Safety is the most critical aspect and seems to be missing in the recovery plan. Alaska state with the largest amount of Grizzly bears has allowed residents and tourists opportunity to get close by using their fish laden rivers knowing that too close is a health hazard. Washington State has no fish in rivers to make these opportunities to experience Grizzly bears in their natural habitat. What would be used instead? With populations growing ever so slightly in Methow Valley and surrounding counties, why does the recovery plan even state a demographic and genetic RISK? There cannot be any reason for this plan to go forward if humans are at risk!

Given the lack of information stated in this recovery plan, recovery of loss of moneys on the possible reintroduction, safety issues of the communities not addressed, I advise a NO ACTION alternative (status quo).

I do request all information on further plans or adjustments to the current recovery plan be forwarded to my e-mail,

Sincerely by í endorsement by

Corr ID 2852



Lynn Peterson Secretary of Transportation Transportation Building 310 Maple Park Avenue S.E. P.O. Box 47300 Olympia, WA 98504-7300 360-705-7000 TTY: 1-800-833-6388 www.wsdot.wa.gov

March 13, 2015

Superintendent North Cascades National Park Service Complex 810 State Route 20 Sedro-Woolley, WA 98284

Re: NEPA Correspondence with Washington State Department of Transportation

Dear Superintendent:

The Washington State Department of Transportation coordinates NEPA document reviews from the region where a project is being contemplated. We have forwarded the notice of intent and scoping notice for the North Cascades Ecosystem Grizzly Bear Restoration Plan/EIS to our North Central Region. In the future, please send any correspondence concerning this project, or other NEPA reviews, to:

Mr. William Gould WSDOT North Central Region 1551 North Wenatchee Ave Wenatchee, WA 98801

If you prefer to email your documents, please send them to:

William.gould@wsdot.wa.gov

Thank you very much.

Sincerely,

Chris Regan NEPA/SEPA Compliance Program Manager Environmental Services Office

CR:dh

cc: William Gould, North Central Region Planning Engineer Barbara De Ste. Croix, Transportation Supervising Engineer Claton Belmont, North Central Region Environmental Manager

Corr ID 2853

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Corr ID 2864 Comments regarding the NCE Grizzly Bear Restoration Plan/EIS: Mar Manc U. 10 1 5 10121 6 0 Ľe Ľ 2 1111 Your Name: Mailing or email address: _ .. Organization (if applicable):___ Official Representative (circle one) Member

I and many other citizens applaud the involved conservation organizations and federal agencies for having the fortitude and the foresight to pursue a healthy grizzly bear population in the North Cascades Ecosystem.

As expected, Okanogan County opposes grizzly restoration and is threatening a lawsuit which are the same tactics they used to thwart Initiative 655 that banned bear baiting and hound hunting for bear, bobcat and cougar in the State of Washington. They are now crying "wolf" as well as potential exaggerated livestock losses from grizzlies.

We live next to Olympic National Forest and close to Olympic National Park and have bear, bobcat, cougar, coyote and an occasional hybrid wolf that travel through our property and have never lost one of our calves, cows, pigs, burros, sheep, turkeys or rabbits to these predators.

Okanogan County Commissioner decry the "Feds" and Environmental groups are trying to destroy their culture, their economic way of life, failing to comprehend traditional, aesthetic and spiritual values the majority of citizens hold toward this wild, magnificent species that represents untrampled, pristine primordial wilderness the way it once was and the way it should be returned to future generations.

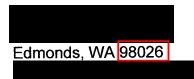
Upon attending the grizzly public forum held at Seattle Pacific University on March 10 and listening to the numerous human-centered concerns and needed assurances, additional public education is crucial to lessen the compromises that will not be in the best interest of the Grizzly.

Some comments expressed were potential livestock losses that lacked credibility, legitimate fear from hikers who favored limited numbers of grizzlies and lacked knowledge of the basic temperament of the species, their reproduction, and their slow population growth, and a parks department representative enthusiastically voiced the potential for grizzly bear watching, sports hunters, opposed to the recovery due to depredation of deer and elk populations.

A bear biologist present at the forum attempted to justify captive grizzly bear redundant research at Washington State University. Sadly, their small enclosure similar to a roadside zoo is a disgrace and absolutely no invasive research should be permitted on wild North Cascades grizzlies that have lived for thousands of years long before us, without any human interference. This must be a higher pursuit rather than personal ego or the gratification of obtaining university grants and advanced degrees next to one's name at the expense of the well being of a wild species that have a life of their own that is important to them apart from us.

Mi biggest concern is relocating several grizzly bears to an entirely new area and expecting them to adjust and thrive in these remote areas to minimize human/bear conflicts without an easily pursued food source. I am not convinced that the areas of relocation are quality grizzly habitat nor by the assurances and research undertaken. I am well aware of the various vegetative food sources of the grizzly. This should be of the highest priority even if it means edible plant restoration at these remote high elevation locations to ensure as smooth a transition as possible given the enormous food consumption of the species that spend their entire lives searching for enough food to survive.

For many of us the return of numbers of grizzlies to their rightful place, their home, free and safe to live out their natural lives is enough and indeed uplifting to the human spirit even if we never see one of them



P.S. We are not using our farm address and would appreciate our personal identifying information withheld from public review. We have already received threats on our voices on the wolf issue. If you have any questions, please call us at the second second

TO WHO IT MAY CONCERN AT GRIZZLY BEAR RESTORATION,

PLEASE SUPPORT THE PROTECTION AND RE-INTRODUCTION OF GRIZZLY BEARS TO THE NORTH LASCADES. AS A WASHINGTON RESIDENT I STRONGLY BELIEVE THIS SPECIES TO BE A GREAT ASSET TO THE N. GASCADES ÉCOSYSTEM AS WELL AS TO DUR STATE. IT IS SHAMEFUL THAT TO SEE WILD GRIZZLIES, WE WASHING TONIANS MUST TRAVEL TO OTHER STATES, WHEN ONCE THEY THRIVED HERE. TO RIGHT A WRONG, BRING THEM BACK I

THANK-YOU

SINCERLY



Corr ID 2866

SEQUIM, WA.

Corr ID 2867 If a man aspires towards a righteous life, his first act of abstinence is from $H \oplus injury$ to animals.) N DA · Albert Einstein С Grizzly Bear recovery sounds like a good idea. I feel the bear will end up as the wolf recovery - with and ignovant cifizens even Fish & Wildlife killing these innocen animals. In eastern Washington, there are too many wildlife halers who will do what they can to set vide of these animals (and, they get away with it!) Wolves, congar and bear belong in our But can it ecosystem. Wildl: happen: Fish 9 doesn 10 South Post Street • Spokane, Washington 99201 Phone (509) 455-8888 • (800) 899-1482 • Fax (509) 624-4455 www.thedavenporthorel.com . info@thedavenporthotel.com

enough to protect our wildlife. Its a share. ы а. н. на • 2 de

Public meetings set for grizzly bear recovery

By K.C. MEHAFFEY World staff writer

NCW — Two federal agencies will host meetings in Wenatchee, Okanogan and Winthrop to explain the process for developing a plan for recovering grizzly bears in the North Cascades.

The open house-style meetings will provide answers so people can comment on what issues the National Park Service and U.S. Fish and Wildlife Service should look at in deciding whether the endangered bears will be imported from other areas in order to re-establish them in North Central Washington.

Comments are due, in writing, by March 26. Grizzly bears

once existed throughout the western United States, but were nearly exterminated during the 1800s, when their numbers reduced from ex-

numbers reduced from an estimated 50,000 to less

Meetings in North Central Washington:

5 to 7:30 p.m., March 3, Red Barn in Winthrop 5 to 7:30 p.m., March 4 at the Okanogan PUD meeting room in Okanogan

6 to 8:30 p.m. at the Chelan County PUD auditorium in Wenatchee

developed by both federal agencies will come up with a range of alternatives to help them repop-

ulate the North Cascades, from taking no action to importing grizzly bears from Canada or other states. Those alternatives will include potential impacts on everything from vegetation and wildlife habitat to human safety and local economies.

A draft plan is expected by next summer, and a decision could come as soon as

the summer of 2017. A recovery zone, which encompasses an area from Canada to Cle Elum and includes the North Cascades National Park and most of the Okanogan-Wenatchee National Forest, has already been established, along with educational needs and other recovery decisions. It is one of five grizzly bear recovery zones nationwide, and the one with the most at-risk population of grizzlies, the agencies said.

At meetings next month, experts from different agencies will be on hand to answer questions, and people can stop in to get answers to questions before commenting on the issues the agencies need to consider in their environmental impact statement. People will have a chance to comment on the draft plan once its released, and the proposed methods for recovery, Froschauer said.

K.C. Mehaffey: 997-2512 mehaffey@wenatcheeworld.com

To comment:

e Submit electronically at parkplanning.nps. gov/NCEG Mail to North Cascades National Park Service Complex, 810 State Route 20, Sedro-Woolley, WA, 98284. Written comments

can also be submitted at the open houses.

27 FEB 2015 RE: GRIZZLY RESTORATION TO LOHOM IT MAY CONCERN. WE LIVE IN THE HISTORIC TOWN OF SILVERTON IN THE NORTH CENTRAL CASCADES AND BORDER THE BOULDER RIVER WILDERNIESS. WE HAVE BEARS, COUGARS, BOBCATS, COYOTES AND ALL TYPES OF WILDLIFE EXCEPT GRIZZLY BEARS WANDERING THEOUGHOUT THIS AREA, WE DO NOT NEED ANY GRIZZLY BEARS! THE MOUNTAIN LOOP SCENIC BYWAY HAS SEVERAL HUNDRED THOUSAND UNSITURS EVERY YEAR AND MIXING & GRIZZLY WITH CLUELESS VISITORS IS UNACCEPTABLE. UISITORS WHICH LEADE TONS OF CARBAGE & HUMAN CAUSED FIRES, CAN HARDLY BE EXPECTED TO LEARN TO LIVE WITH GRIZZLIES, LET THEM FIND THEIR WAY WITHOUT ENCOURAGEMENT! DINCERELY (RETIRED WA STATE FISH " LUILDLIFE) (RETIPED U.S. Forest Service) CRANITE FALLS, WA 98252

Corr ID 2869

February 25, 2015

Ellensburg, WA 98926

Rob Smith NW Regional Director North Cascades National Park 810 State Hwy. 20 Seedro Woolley, WA 98284

Dear Sir,

Respectfully yours

I am a resource management professional and have worked as a geologist, hydrogeologist and a hydrologic technician in the North Cascades, the Pasayten Wilderness and the northern n portion of Okanogan County for nearly two decades. I spent last summer on the Mt. Baker-Snoqualmie NF, working out of the Glacier Work Center, performing road surveys for the Forest. As an individual who actively crawls through the slide alder and devils club in the performance of my job, I most emphatically do not support the reintroduction of a grizzly bear population into the North Cascades National Park. Thrashing through a willow thicket to confront a black bear is exciting enough for me and I do not want to have such a confrontation with a grizzly bear. I've worked in the woods in Washington, Idaho and Alaska and prefer not to carry a fire arm, but if compelled, I will do s again. The reintroduction of the bear, in the abstract, is seemingly benign, but for those of us on the ground, where the actual interactions occur, it is anything but that.

Corr ID 2870 Comments regarding the NCE Grizzly Bear Restoration Plan/EIS: much (tory AS are Q 2 ar Oriz We need C 5 LOW Sa imon TOV CI ND 151 0105 P pn 0 R NOT!) Heren RI vmar muni 0 ee bove 10505 0 Case ele AXAS a 0 Lon 0 ations DOD 1 63 22 N D ave NP 17 V 10. 7 2 CLOSYStem MONG 01 tan no we 0600 fel Can Vast a de ASC Co wo4 MQ NING 122 Espec 48 Ecocustem in DWC LOFT 14 Your Name: Mailing or email address: Basecamp ascades North Organization (if applicable):____ Official Representative (circle one) Member

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Large Bear Sighting Little Beaver Creek Trail June, 2010

Corr ID 2872

While hiking westward on Little Beaver Creek Trail a few hundred meters west of its junction with Big Beaver Creek Trail, my companion and I watched a large bear for three to five minutes at a distance of 50-75 meters. The bear, perhaps 2.5 to three times larger than any black bear I had seen, was south of the trail close to Little Beaver Creek. Upon sighting us, the bear rose on its hind legs with forepaws resting on large tree trunk to better observe us. We made a commotion by blowing whistles and waving hats and trekking poles. The bear was in no way intimidated. The bear walked slowly to the trail and stared at us. The distance to the bear remained about 50-75 meters. The commotion continued. The bear was neither intimidated nor the least bit aggressive. The bear returned to the original spot near the tree and then slowly walked eastward along Little Beaver Creek. We continued westward.

My companion took several photos of the bear which show what appears to be a hump. During the excitement of the encounter, I did not notice the hump. I was impressed by the size of the bear and by its disregard of our commotion. I have seen about 20 Black Bears and none remained unaffected during an even shorter exposure to such a commotion.

It was a thrilling encounter. I enthusiastically support the active recovery of Grizzly Bears to the North Cascades. They are a regional icon and a key part of our natural heritage. Grizzly bears have been part of the Pacific Northwest landscape for thousands of years. I believe that we have an ethical and legal obligation to restore this native species. Grizzly bear recovery in the North Cascades is an important part of national efforts to restore endangered animals where suitable habitat still exists.

Bellingham, WA 98229 March 25, 2015

Superintendent's Office North Cascades National Park Service Complex 810 State Route 20 Sedro Woolley, WA 98284

Subject: Grizzly Bear Restoration

To Whom It May Concern:

I am writing you today to inform you that I am in full support of Grizzly Bear Restoration in the North Cascades. I want the agencies leading this public process to take into full consideration the ecological, cultural, spiritual, and economic importance grizzly bears have to the Pacific Northwest.

Numerous scientists, biologists have already proven in Alaska, Minnesota, British Columbia and even Russia that bears and people can coexist given bears are given enough habitat/wilderness in which to survive and education/knowledge about bears by which people can act and react. Grizzlies – tend to be quiet loners, naturally shy of human contact. Attacks while always a possibility, are isolated instances, and experience tends to tip the odds in favor of humans.

Naturalist Enos Mills (late 1800's) walked the mountains of Colorado unarmed, approaching bears and observing them in thoughtful, loving detail. He wrote, "It is a national misfortune that the overwhelming majority of people be imposed upon with erroneous natural history" "The grizzly does not look for a fight; he is for peace at almost any price". "It would be a glorious thing if every one appreciated the real character of the grizzly bear".

I want to see the best available science used to identify and implement active strategies to restore grizzlies to the North Cascades. This could include augmenting the existing population of grizzly bears in the North Cascades with additional bears through an open process that includes thorough scientific and community guidance.

I appreciate that the National Park Service is considering grizzly restoration and truly thank you.

Sincerely,		
κ.		

North Cascade Ecosystem/Grizzly Bear Restoration Plan

I attended the public meeting held in Wenatchee Wash. I came away with the feeling of my time was again being wasted. It was obvious the personnel presenting the program were not interested in personnel observations of grizzly sightings. You had to have degree in grizzly identification and documented photographs before they were interested enough to let you know they had studied the area and it needed more grizzly introduced, why even the grizzly population across the BC border was down.

The last grizzly I know of being killed by man was in 1958 by Dave S. in the same area I began hiking into to fish at the age of 13. It was here that I first noticed the difference between the bears feeding in the high grassy slide area north of my camp site. The black bear were only allowed to encroach into the marginal edges while the bigger browns were feeding.

The last time I saw a grizzly in that area was on a hunting trip 1994. It was a beautiful sow with two cubs. My back packing days ended the next summer in a major auto accident.

I do not believe in bringing more grizzly into any area in the state of Washington. If the population is low it is because the food source is not there. The salmon runs are a mere shadow of previous times reducing the fattening winter process. The creeks were bank to bank fish in the fall and the bear were there getting fat, no more. The open feeding areas of loggings are no longer there. The feed animals such as elk and deer fawns are being decimated by the wolves, growing cougar populations and the black bear populations are rising. Introducing more grizzlies will only increase food competition and force more dangerous human interaction as food hunters move into the cities.

You will never know how many grizzlies are in the area until you have boots on the ground and have spent time in every square mile of the proposed introduction area. I am sure your round file will easily hold these comments. Thank for your time

Wenatchee Wa. 98801

Corr ID 2875 Comments regarding the NCE Grizzly Bear Restoration Plan/EIS: HUP 01 an woor P an re m a w P Pr d 0 and 011 SEC IN ζ ar Privi ON a At hurdle the wIl, be fear greatest P Tha contingen and P nservative h mmuntu d Pa C utr 2009 PVS P und and a concerns. hPir USFWS Park Service and National wish the process. uck with this Your Name: 9886 Winthrop, WA Mailing or email address: Organization (if applicable):_ Official Representative (circle one) Member

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Member

Official Representative

(circle one)

Corr ID 2877

Support GBear recovery in N. Cascades efforts Bears reach people Support TO live 70 W alternative reintroduction is used 20 as an iT ie. enough succeed. Intent beas adequatel succeed S 10 aces all efforts ecoregions. for recove . Your Name: Mailing or email address: Organization (if applicable): Official Representative (circle one) Member

To: Superintendent North Cascades National Park 810 SR 20 Sedro - Wooley, Wa., 98284

Re: Introduction of Grizzly Bear to Northern Cascades

To whom it may concern:

We recommend the "No Action Alternative" be implemented. Our reasons are well stated in the two attached letters also recommending no action. In addition, we include the following:

The written records of Fort Okanagan clearly show that the hides of Grizzlies processed by this facility had come from farther north, with Black Bear hides being the type to come from closer at hand. This was consistent from circa 1811 until circa 1862, if memory serves correct. As such, we contend this is evidence that their was no notable population during the trapping era. Their would be no reason to falsify the records, as all Pacific Fur properties including Fort Okanagan, were ceded as part of the treaty ending the war of 1812.

In regards to later times, I offer the following:

In 1967, our family was planning a vacation that included Yellowstone National Park, which spurred my researching Grizzly Bears. What I discovered was scary to a kid, so I asked my father if we had any, as I had heard stories of encounters. He told me to talk to my friends dad, Bob Jones, as in his opinion no one would know more about this subject then him. Bob was past 60; an outdoorsman of the 19th century school, having spent most of his life working the sheep circuits and trapping. Most relevant, he Montana, and had worked in Grizzly country for years before coming to our region.

He told me Grizzlies were just as bad as they sounded, but in the many seasons he had worked our circuit, he had never seen a Grizzly. This included the bear kills in which a relief was sent so he could confirm if a Grizzly had been killed, as he was considered the best authority on the subject by his peers. He was absolutely convinced the only Grizzlies in the region were looking for territory, and moved on as they didn't find any. He pointed out, no one was more familiar with bears than men who worked the circuit. When he first came to our region, he had been told the same thing by an older herder who was then considered the expert, and had come out from Montana at the start of the century. That was the biggest draw to come out west, as he had been in a kill or be killed situation more than once.

Moose were rare in this area 50 years ago, one being seen every couple of years and being news. Now, we have a native population, and they have expanded down without interference as habitat developed. The same thing has happened farther east, so it is not a localized phenomenon.

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Grizzly Bears will also move South, if and when the habitat is right. Artificial transplant measures will only interfere with the natural migration and expansion of the nearest existing population. This would be a direct opposite of the intentions of the Endangered Species Act, and could be viewed as a means to push any remaining remnant that may exist along the border out of the area. Transplanted bears will keep looking for suitable habitat with adequate food, and will have no instinct to return North as a ranging native would. As such, they will wander until they starve, or until they find a source. The likely source will be in conflict with Black Bears, domestic animals, and mankind.

In summation, we ask no action be taken, as this plan appears to not be properly researched, appears to ignore the facts that we do have, and is inadequate regarding measures to mitigate problems other than forcing those who have problems due to implementation to get out of the way.

Respectfully submitted,

3/16/2015

[Type the sender name] [Type the sender company name]

Superintendent North Cascades National Park Service Complex 810 State Route 20 Sedro-Woolley, WA. 98284

To whom it may concern;

After reading the Grizzly Bear Recovery Plan with supplements dated 6-23-1997, I have these concerns and views. As an adult with 50+ years of hiking, hunting and enjoying the Okanogan County region from the Canadian border south to Wenatchee. I feel the Recovery Plan is far from usable at this time. The plans own statements of lack of information for the ecosystem in itself shows more time is needed before reasonable judgements are made.

In the North Cascades the plan shows from the stats listed that Grizzly bears that are claimed to be here have not grown in numbers. Why then if the bears have not been killed off since the listed last killing of 1967 there are not more? After a 48 year time period, the normal reproduction rate should show considerable more. The answer is habitat and or food. The research from the Methow Valley shows trappers only listed fur from Black bears. These records are from 1880's.

The plan lists 200-400 bears to be possibly introduced in the North Cascades. We know bears reach out to the easiest food source. The current cattle ranchers, sheep herders, horse breeders and small communities will be greatly affected. The Recovery plan states possible changes, reduce or even stop cattle ranchers, timber harvests, mining, recreation, water development and energy development etc. as stated in NC132 must not be considered at all costs. The Methow Valley has no commercial business employing vast amounts of people. We only have tourists, hundreds of vacation homes with families and a farming community which is cattle driven. Any one of these reduced or removed would greatly affect the economy. Okanogan county already has one of the highest unemployment rates in the state. Why does the Recovery plan not have a plan for losses due to the Grizzly bear in anyone of the areas listed in NC132?

How does the U.S. Fish & Wildlife plan to address the lack of funds listed in the Washington State RCW 77.12.035. No funds mean NO help from any state agency. The RCW states. The commission shall protect Grizzly bears and develop management programs on publicly owned lands that will encourage the natural regeneration of Grizzly bears in areas with suitable habitat. Grizzly bears shall not be transplanted or introduced into the state. Only Grizzly bears that are native to Washington state may be utilized by the department for management programs. The department is directed to fully participate in all discussions and negotiations with the federal and state agencies

relating to the grizzle bear management and shall fully communicate, support and implement the policies of this section.

Safety is the most critical aspect and seems to be missing in the recovery plan. Alaska state with the largest amount of Grizzly bears has allowed residents and tourists opportunity to get close by using their fish laden rivers knowing that too close is a health hazard. Washington State has no fish in rivers to make these opportunities to experience Grizzly bears in their natural habitat. What would be used instead? With populations growing ever so slightly in Methow Valley and surrounding counties, why does the recovery plan even state a demographic and genetic RISK? There cannot be any reason for this plan to go forward if humans are at risk!

Given the lack of information stated in this recovery plan, recovery of loss of moneys on the possible reintroduction, safety issues of the communities not addressed, 1 advise a NO ACTION alternative (status quo).

I do request all information on further plans or adjustments to the current recovery plan be forwarded to my e-mail,

Sincerely

25B Snowberry Lane Winthrop, WA 98862 March 12, 2015

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Superintendent North Cascades National Park Service Complex 810 State Route 20 Sedro-Woolley, WA 98284

In regards to: Introducing Grizzly Bears into the North Cascades Ecosystem

Dear Superintendent,

My recommendation is that the "No Action Alternative" be implemented. What follows are my reasons for this choice:

As you know the North Cascades Ecosystem (NCE) encompasses an area larger than the North Cascades National Park. In rough terms in the sector near the Canadian Border the ecosystem stretches from the town of Glacier to Loomis. From the Canadian border it stretches south to I-90. The southern west to east direction is from Skykomish to Leavenworth. Notice that the ecosystem is traversed by Highways 2 and 20. Along with Highway I-90 to the south these routes and associated forest roads provide ample human access. The attractions are the wilderness and recreation areas and national parks contained within the NCE. You are also aware that outdoor recreation is a high priority for many Washingtonians. The following gives you a good indication:

- 1) The Alpine Lakes/Enchantments are so popular that overnight use is restricted to having a permit.
- Along Highway 20 in the North Cascades numerous trails have been developed for travelers to access from their parked cars some of the best scenery in the Cascades. These opportunities are highly used
- 3) The Pasayten Wilderness Area is highly used by both backpackers and high hunt pack trips. Party size is also limited.

So the **first point to understand** is that while the NCE is a huge area of undeveloped land; it is one of the most intensively used areas for recreation that creates a very high potential for human/grizzly bear interaction. While grizzly bears are reclusive and tend to avoid areas of high human activity the high use of the backcountry increases the potential for bear/human interactions that create stress leading to negative consequences. If these bears are so accommodating why is a major component in ones back country kit supposed to bear spray?

The **second point** is in reference to the habitat. There is no documentation that I observed that actually quantified the available food sources, their accessibility for bears,

and the location of theses food sources that would give reasonable assurance that a certain population of bears can be supported without reliance upon food sources from agricultural activities and other human food sources. Without this data the introduction of Grizzly bears may result in bear habituation with humans and human food sources. This data would also explain why grizzly bears don't exist in high numbers in the North Cascades Ecosystem. Further more the problem of any form of habituation of upper food chain carnivores with humans leads to the fact that humans may become part of that food chain as noted in the documentary "The Beast in the Garden" by David Baron.

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The **third point** relates to why more Grizzly bears have not migrated to the NCE from Canada. It has been noted that grizzly bears have not migrated into the NCE because of human settlement barriers located in Canada. Yet similar human use and settlement barriers exist in the NCE that grizzly bears would have to navigate to fully use this habitat. This would mean several things: 1) The habitat of the NCE isn't really that attractive to grizzly bears for the same reasons they don't come here, 2) Originally the pre-settlement numbers of grizzly bears were low due to the fact that this is pass through habitat bears used to get to other places.

The **fourth point** indicates grizzly bear numbers have historically been low or none existent. Brian L.Horejsis, the founder of Speak up for Wildlife Foundation, states the following: "Evidence shows clearly that the presence of domestic sheep is not compatible with bear population viability." The Pasayten Wilderness Area was used extensively from the late 1800's to 1980 to graze sheep. These sheep herders record no accounts of grizzly bear interactions with their sheep during their time in the Pasayten high country.

The **fifth point** is that due to extensive fires in the region, the location of wolves in the northeastern part of the state and in Okanogan County, the escalating conflict between ranchers and owners of small home farms, introducing grizzly bears and going through the process is adding hurt to injury distracting from the issues that need to be addressed to recover from the extensive fires and address the escalating wolf issues. Money spent on grizzly bear introduction and eventual conflict management is better spent on forest restoration, helping people recover from loss due to fire and wolves.

The **sixth point** relates to the high level of incompetence in introducing and handling listed wolves. Introducing grizzly bears is a much larger problem. We don't trust your competency to introduce grizzly bears and manage them. Instead it is more likely that human conflict with ideological environmentalism will increase.

The **seventh point** is that it is obvious you are seeking to pick a fight with our agriculture community. Note the quote from a biologists involved with grizzly bear introduction and recovery:

Expansion of grizzly bear recovery areas. The continued presence of cattle in recovery areas for threatened and endangered grizzly bear populations is not compatible with population viability or recovery. Existing recovery areas appear to be inadequate and require expansion to increase probability that long-term

recovery will occur. It will be necessary to incorporate buffer areas and potential grizzly bear habitat on adjacent public lands. Management of livestock on these lands must be consistent with recovery objectives.¹

This means eventually this effort will attack, seek to modify and or regulate existing grazing and ranching opportunities in Okanogan County.

The **eighth point** highlights the purpose of the Endangered Species Act which is to recover or protect species that exist in a specific ecosystem. This means your activities should be confined to protecting whatever bears exist in the North Cascades Ecosystem. This eliminates introducing species or populations that are not already there. Please note RCW 77.12.035:

The commission shall protect grizzly bears and develop management programs on publicly owned lands that will encourage the natural regeneration of grizzly bears in areas with suitable habitat. Grizzly bears shall not be transplanted or introduced into the state. Only grizzly bears that are native to Washington state may be utilized by the department for management programs. The department is directed to fully participate in all discussions and negotiations with federal and state agencies relating to grizzly bear management and shall fully communicate, support, and implement the policies of this section.

With these points in mind, I heartily enjoin the Interagency Grizzly Bear Committee to obey Washington State law and take the "no action alternative" regarding grizzly bear introduction into the North Cascades Ecosystem.

Respectfully yours,

¹ Brian L. Horejsi, Ph.D. RANCHING IN BEAR COUNTRY Conflict and Conservation

Dear Superintendent of North Cascades National Park Service Complex;

As a member of the public who knows the importance of having all of the top predators on the landscape, please accept my comments regarding the reintroduction of grizzly bears within the North Cascades Ecosystem.

I strongly support the reintroduction of grizzly bears into the North Cascades Ecosystem based on the following factors:

Biological: As noted in the EIS newsletter

- Nearly 3,800 grizzly bear hides were shipped out of area forts during one 25year period" and "research indicates this wilderness landscape is capable of supporting a self-sustaining grizzly bear population.
- There has only been one observation of a solitary bear during the past 10 years. Given the low number of grizzly bears, very slow reproductive rate and other recovery constraints, the NCE grizzly bear population is the most at-risk grizzly bear population in the United States today.
- The main threat to grizzly bears in this recovery zone is a small population size, with resulting demographic and genetic risks. Natural recovery in the NCE is challenged by the absence of verified reproduction and isolation from any contiguous populations in Canada and the United States.
- Enhance the probability of long-term survival and conservation of grizzly bears within the lower 48 States and thereby contribute to overall grizzly bear recovery.

Comment: Considering that grizzlies previously occupied the large block of contiguous habitat in fairly significant numbers, yet only one observation has occurred during the past 10 years, reintroduction is the only method to assure their successful return. In addition, due to their need for large home ranges, slow reproduction rate, and territorial nature; dispersed reintroduction would successfully speed up the recovery of grizzlies into the NCE.

Legal: As noted in the EIS newsletter:

The U.S. Fish and Wildlife Service (FWS) recently reaffirmed that the NCE grizzly bear warrants uplisting from Threatened to Endangered under the Endangered Species Act. Support the removal of the grizzly bear from the Federal List of Threatened and Endangered Wildlife Species.

Comment: Thanks to the ESA, among other recovered wildlife species, today we can witness gray whales migrating along the Pacific coast, gray wolves roaming within the Great Lakes region and the Northern Rocky Mountains; peregrine falcons, bald eagles, osprey, brown pelicans and California condors are soaring in the skies; and black footed ferrets are returning to the Great Plains.

The ESA has brought these species back from the threat of extinction and in the process has provided us the opportunity to learn how ecosystems function, taught us that nature replenishes our spirit and provides us empathy for other living creatures.

The reintroduction of grizzlies into the NCE would be another ESA success story and allow the USFWS to speed up the recovery of other species throughout the U.S.

Ecological: As noted in the EIS newsletter:

Contribute to the restoration of biodiversity of the ecosystem for the benefit and enjoyment of present and future generations

Comment: Today, numerous studies have indicated that a "top-down" ecosystem functions best when apex predators such as bears, wolves and cougars are allowed to roam the landscape without the threat from humans. The Greater Yellowstone Ecosystem is slowly being restored in large part due to the reintroduction of gray wolves.

Grizzlies are umbrella species and their return to NCE would ensure the protection of habitat for wolverine, Canada Lynx, gray wolves and numerous other species that depend upon large tracts of untouched spaces. Humans would benefit with clean air and water and open spaces to recreate in.

Social: As noted in the EIS newsletter:

- Restore a grizzly bear population as part of the natural and cultural heritage of the North Cascades.
- Seek to support Tribal cultural and spiritual values, as well as environmental and natural resource objectives related to the grizzly bear.

Expand outreach efforts to inform and involve the public, and build understanding about grizzly bear recovery.

Comment: Today, we have learned that grizzlies are not mythical monsters that roam the landscape searching for humans to kill. From 1980-2002, over 62 million people visited Yellowstone National Park (YNP). During the same period, 32 people were injured by bears. The chance of being injured by a bear while in the park is approximately 1 in 1.9 million. Five known bear-caused human fatalities and 1 possible fatality have occurred within YNP. Of the five books I have read regarding grizzly bear attacks, out of all of the people that have been severely mauled by grizzlies, none of them wanted the bear killed. They knew they had encroached on the bear and they were the guilty party, not the bear.

http://www.yellowstone-bearman.com/yell_bear_maul_info.html

In comparison; in the US, yearly human deaths due to bees/wasps are 53, dogs 31, horses 20, spiders 6.5 and rattlesnakes 5.5.

https://historylist.wordpress.com/2008/05/29/human-deaths-in-the-us-caused-by-animals/

We have learned preventive measures to reduce conflicts with grizzlies. Proper food storage, hunters hanging their food high in a tree, not leaving garbage around, hikers talking while walking in groups and having bear spray readily available with the knowledge on how to use it in case of a sudden encounter.

Ranchers are using in-expensive fencing and specially bred dogs to guard their livestock. Even as grizzly bear populations are recovering within the GYE and NCDE, bear deaths due to human conflicts is decreasing in these areas. We have and continue to learn how to live among grizzlies and for that our lives become a little better.

Native American Indians regard the grizzly bear with awe and respect. Many native tribes thought of the bear as a "god". Often found in Indian paintings and engraved in jewelry, the grizzly was a sign of strength. They referred to the grizzly as "father".

Economical:

Provide Pacific Northwest residents and visitors with the opportunity to again experience grizzly bears in their native habitat

Wildlife viewing is one of the most popular activities in the west with Yellowstone National Park creating 382 million dollars in economic benefits to surrounding communities. The Wyoming office of Tourism is currently targeting the Seattle area for visitors to come see Yellowstone's natural wonders and wildlife. Of the wildlife species visitors want to see, grizzlies and gray wolves top the list. Instead of travelling thousands of miles to Yellowstone and/or Glacier National Parks, Pacific Northwest residents and visitors could travel hundreds of miles for the opportunity to witness grizzly bears in their former habitat.

The single most important action for successful grizzly bear reintroduction is for conservation groups to start a compensation fund. It is economics that makes ranchers hate grizzlies. Pay them for their losses and the controversy will subside. People who support grizzly bear recovery should set up a compensation fund and help pay the costs.

In closing, I have a personal reason for supporting the reintroduction of grizzly bears into the NCE. Approximately 15 years ago while hiking in Glacier NP, I had a close encounter with a grizzly and my life was forever changed for the better (I now know how to hike in grizzly country). The bear could have torn me apart as I had encroached on his space, but instead, he just kept on eating huckleberries. The encounter with the bear was heart throbbing but the beauty and wildness of the landscape was inspiring. Today, there are few places in the US that provide this kind of beauty and the NCE is one of them. The return of grizzlies would not only return the top predator, but it would afford the best opportunity for the landscape to remain whole.

Sincerely.

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Corr ID 2881

Date: 24 March 2015

To: Superintendent, North Cascades National Park Service Complex

From: Saul Weisberg, Executive Director, North Cascades Institute

Subject: Institute Comments on North Cascades Ecosystem Grizzly Bear Restoration Plan

Thank you for the opportunity to comment during the scoping process for the North Cascades Ecosystem Grizzly Bear Restoration Plan / Environmental Impact Statement.

North Cascades Institute strongly supports active restoration of grizzly bears to the North Cascades ecosystem.

For nearly 30 years North Cascades Institute has brought students of all ages to explore the mountains and rivers of the North Cascades. Ranging in age from 8 to 80, our participants come to experience, discover, learn from, and share this special part of the world. Now, the National Park Service, the US Fish and Wildlife Service and their partner agencies have the opportunity to restore a critical missing part of the wilderness puzzle that is the North Cascades – healthy populations of Grizzly Bears.

There are many reasons why grizzly bears should be restored to the North Cascades:

- Grizzly bears are a keystone species of the North Cascade. Through predation, scavenging and ground disturbance they impact the ecosystem and its wildlife and vegetation in profound and important ways. The loss of the few remaining grizzly bears would significantly degrade the ecosystem, from both a ecological and cultural point of view.
- With the restoration of grizzly bear and pacific fisher populations, the North Cascades ecosystem will have its full complement of native wildlife. This represents a plus for park visitors, as well as sustainable growth in local and regional economies through increased visitation and longer stays. Grizzlies, and wolves, fuel year-round visitation, guiding services and education opportunities in the Greater Yellowstone Ecosystem.
- Public support for grizzly restoration in the region is strong. While there would be challenges to restoration, in a predominately wilderness ecosystem of nearly 10,000 sq. miles, conflict with humans and livestock should be limited and controllable. Ongoing education and monitoring will be needed and has demonstrated success in other regions of the west.
- Restoration would contribute to ecosystem biodiversity and benefit present and future generations of Americans who live in ever increasing numbers in the ten counties that make up and surround the North Cascades.
- Thee North Cascades provide excellent grizzly bear habitat. Even though these magnificent animals have been nearly eliminated from the ecosystem, research indicates the North Cascades provide excellent grizzly habitat. Grizzly restoration would likely succeed with active support from the land management agencies and local communities. Such activities should begin soon.

Because North Cascades Institute brings significant numbers of people to the ecosystem to take part in conservation education programs, we have looked into issues of safety and risk management with peer organizations that operate in grizzly country. Yellowstone Association Institute and Teton Science Schools have worked with tens of thousands of school children, families and adults for over 40 years in the Yellowstone backcountry. If grizzlies were restored to the North Cascades, the additional protocols we would put in place, in addition to standard "bear aware" practices that we already require from all participants, is a minimum group size of four, with group leaders carrying bear spray. These protocols are basic for anyone visiting wilderness areas that contain large carnivores.

At North Cascades Institute we look forward to educating our students about grizzly bears, and one day standing with those students, looking out over an intact, healthy ecosystem, knowing the grizzly has returned home.

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