

December 14, 2022

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

Comments submitted electronically via website: https://parkplanning.nps.gov/
Re: 2022 North Cascades Ecosystem Grizzly Bear Restoration Plan/Environmental Impact Statement

Dear Superintendent Striker,

Thank you for the opportunity to provide scoping comments on the North Cascades Ecosystem Grizzly Bear Restoration Plan.

Outdoor Alliance Washington is a network of member-based organizations representing the human-powered outdoor recreation community in Washington. The network includes Access Fund, American Whitewater, Evergreen Mountain Bike Alliance, The Mountaineers, the American Alpine Club, Surfrider Foundation, and Washington Trails Association. We represent the thousands of Washingtonians who climb, paddle, mountain bike, hike, and enjoy coastal recreation on public lands and waters.

As a group, we help contribute over \$8 million to the Pacific Northwest Region in recreation user fees annually and help maintain thousands of miles of trails, leverage grant funds for recreation, and volunteer at recreation sites for activities such as outdoor education and youth programs. The outdoor recreation economy in Washington State generates \$26.5 billion in annual consumer spending and \$3.4 billion in state and local tax revenue and directly employs 264,000 people in our state.

Our groups submitted scoping comments in 2015 on the North Cascades Ecosystem Grizzly Bear Restoration Plan and comments in 2017 on the Draft Environmental Impact Statement (DEIS). It is our understanding that those comments will still be considered in the development of the new EIS.















We request that the new EIS provides robust details on recreation, trails, and public safety impacts and management techniques in each of the potential alternatives. As our 2017 comment letter reads, the previous DEIS vaguely identified these issues and provided little detail or direction.

Please consider the following issues to analyze for the EIS and provide specific detail regarding how the following may be impacted and recreation management techniques that are likely to be utilized:

Restrictions on Use of Public Lands – Continued access to the special places people love to visit in the North Cascades is incredibly important to hikers, climbers and other recreationists. What kind of uses will be altered for grizzly bear recovery? Please address how the following may be impacted and recreation management techniques that are likely to be utilized:

- Access to developed and dispersed recreation sites by motor vehicle;
- Recreation activities that utilize trailed and trail-less areas such as hiking, climbing, mountaineering, mountain biking, electric mountain biking, and trail running;
- Day trip party size restrictions, both minimum and maximum;
- Overnight backcountry use and party size restrictions, both minimum and maximum;
- Outfitters and guides; and
- Permanent, seasonal and temporary trail and backcountry closures.

If the DEIS will contain a map with potential staging and release areas, please include all recreational sites, including campgrounds, trails, major roads, and other recreational sites.

Restrictions on New and Existing Trails – The majority of hikers and other recreationists depend on trails to reach their favorite recreation destinations. How will the development of new trails be impacted by grizzly bear recovery? How will existing trails and the maintenance of those trails be impacted by grizzly bear recovery?

Human Health and Safety –Please specifically address how human health and safety will be impacted in each alternative, including food handling, backcountry food storage, and sanitation. What are the potential risks to human safety?

Grizzly Bear Habitat & Adjacent Lands – How will grizzly bears and their habitat be managed? How will core habitat evaluation be handled in the North Cascades Ecosystem? The baseline for core habitat in Mount Baker-Snoqualmie National Forest was established in the 1990s. Will the EIS re-establish the baseline for core habitat and trail and road usage inventories? How will lands outside of the grizzly core area be affected by grizzly bear management?

Designated Wilderness – How will the project and associated tools such as aircraft affect wilderness character, visitor experience, and primitive recreation in designated wilderness areas of the North Cascades?













Public Involvement and Outreach

Given the scope of North Cascades Ecosystem Grizzly Bear Restoration Plan and the potential impacts to high use, popular trails, recreation sites and access roads, Outdoor Alliance Washington partners recommend ongoing outreach and public involvement with the restoration plan in addition to the formal public process. In particular, we welcome a continued dialogue with hikers, climbers, trail runners, mountain bikers, electric mountain bikers, and others who recreate in the North Cascades and are interested in the potential impacts they may face in the years to come from the recovery of grizzly bears. We ask that the Plan team fully consider the complex array of factors that impact recovery and recreation.

Conclusion

Thank you for considering our scoping comments on the North Cascades Ecosystem Grizzly Bear Restoration Plan. We look forward to continued involvement in this project as it develops. Please let us know if you have any questions or if we can be helpful.

Sincerely,

Betsy Robblee

Washington Policy Manager Outdoor Alliance Washington

Cc:

Ty Tyler, Stewardship Director, Access Fund
Thomas O'Keefe, Pacific Northwest Stewardship Director, American Whitewater
Yvonne Kraus, Executive Director, Evergreen Mountain Bike Alliance
Liz Schotman, Washington Regional Manager, Surfrider Foundation
Eddie Espinosa, Director of Community Programs, the American Alpine Club
Betsy Robblee, Conservation and Advocacy Director, The Mountaineers
Michael DeCramer, Policy and Planning Manager, Washington Trails Association













