

November 13, 2023

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

RE: Draft Grizzly Bear Restoration Plan-Environmental Impact Statement North Cascades Ecosystem

comments submitted electronically through the comment portal - <https://parkplanning.nps.gov/>

Dear Superintendent Striker,

Thank you for the opportunity to provide comments on the North Cascades Ecosystem Grizzly Bear Restoration Plan and Draft Environmental Impact Statement (DEIS).

The Access Fund, The American Alpine Club, American Whitewater, Evergreen Mountain Bike Alliance, The Mountaineers and Washington Trails Association represent tens of thousands of human powered recreationists who care deeply about public lands in the North Cascades Ecosystem. Our organizations work together on issues relating to recreation, access and conservation. We have participated in grizzly bear planning efforts for many years. Our groups submitted scoping comments in 2015 on the North Cascades Ecosystem Grizzly Bear Restoration Plan and comments in 2017 on the previous DEIS. We submitted a comment letter in 2022 during the scoping for this project. Staff from our organizations have reviewed the published materials, attended public meetings and discussed the implication of the various alternatives with members of the planning team from both co-lead agencies. This letter builds on our previous communications. **We ask that you consider our input and add additional information to the final EIS regarding the impacts of grizzly bear reintroduction on recreation.** We hope that our comments, which are grouped thematically, will be useful to you as you move ahead with this process.

Alternatives

Our organizations have considered the alternatives presented in the DEIS. We do not have a shared position on the merits of reintroducing grizzly bears into the North Cascades Ecosystem (NCE), but we all believe that the public would benefit from a larger grizzly bear management toolkit than is available under existing Endangered Species Act section 4(d) rules. **If North**

Cascades National Park selects one of the action alternatives, we believe the responsible official should select alternative C, the preferred alternative.

Classifying the reintroduced population of grizzly bears as a nonessential experimental population is appropriate. The DEIS states that alternative C would lead to greater social tolerance of grizzly bears and “improve the chances of establishing and maintaining a grizzly bear population in NCE” (72). Based on this analysis, alternative C would best achieve the purpose of the plan and most likely meet the needs of the recreation community. The preferred alternative would give managers greater flexibility to relocate bears and would allow managers to use deterrence to prevent conflicts from arising.

Our request:

- Alternative C allows deterrence “for the purposes of avoiding human-bear conflicts or to discourage bears from using areas in the immediate vicinity of homes and other human-occupied areas” (38). To the best of our knowledge “human-occupied areas” is not defined in the DEIS. We request that the final EIS clarify the types of recreation sites (ex. campground, trailheads, backcountry camps) that fit under this definition and explicitly allow deterrence from high-use recreation areas under the proposed 10(j) rule.

Consequences for Recreation

The DEIS highlights the importance of outdoor recreation to residents of Washington and the state’s economy. The DEIS states that “recreational use of federal lands in the NCE is estimated to be 8 million recreation visitor days per year” (111). It also says that “more than 264,000 jobs in Washington were supported by outdoor recreation spending” (137). The plan acknowledges that hiking, climbing, water-based recreation, snow-based sports and other recreational opportunities are important uses of the project area. The planning team assessed the potential impacts on visitor use and recreation. They concluded that in both alternative B and alternative C reintroducing bears would have both adverse and beneficial impacts. The DEIS states that the net impact would be positive as a result of reintroduction since the public would have the opportunity to view a restored population of grizzly bears.

More information on the impacts of reintroducing grizzly bears on recreation is needed in order for the public and the co-lead agencies to fully evaluate the consequences of the proposed action on recreation and rural economies. In particular, our organizations did not find sufficient discussion of the impacts of the action alternatives on backcountry recreation. We wish to know whether additional restrictions will be added that impact access to outdoor recreation. Does North Cascades National Park intend to change its Wilderness Management Plan or other management direction in ways that would impact recreational use? In the final EIS, we ask that you address how the following may be impacted or include language stating that no changes are required:

- Access to developed and dispersed recreation sites by motor vehicle;
- Backcountry recreation activities that utilize trailed and trail-less areas such as hiking, climbing, mountaineering, boating (e.g. packrafting), 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; and
- Permits for outfitters and guides.

Closures

Our organizations have communicated throughout the development of this plan that continued access to the special places in the North Cascades is incredibly important to hikers, climbers, mountain bikers and other recreationists. As such, we appreciate the language in the DEIS that specifies that releasing grizzly bears will have limited impact on public access and would not require long term closures. The DEIS says that “identified release sites would be in locations that are remote from high human-use areas” (129). It states that release sites would be surveyed and agency staff would select different locations if park staff determine that visitors are in the vicinity of a proposed release site (30). This guidance will minimize impacts on backcountry visitors during bear release activities. Our organizations noted that two of the three proposed release sites contain national scenic trails. Thank you for specifying that “the agencies do not anticipate the need to institute trail closures along the Pacific Crest Trail and other high use trails” (122).

Long term impacts from reintroducing bears on recreational access is partially addressed in the restoration plan. We appreciate that the plan suggests that reintroducing bears will not cause major changes to public access. The DEIS says:

Under all action alternatives, occasional short-term closures (a few hours up to a few days) could take place on a case-by-case basis, based on bear activity (e.g., a female with cubs near high human-use areas) or timing and location of a release... No long-term closures or modifications to public access would be implemented because of grizzly bear restoration. The agencies do not anticipate the need for lengthy closures such as those experienced in Yellowstone National Park because no similar bear congregation areas have been identified (32).

We believe that the intention to avoid extended area closures should be included in the final EIS. Additionally, we ask you to include more information on the process for determining when short-term closures are needed. In the final EIS, expectations around closures ought to be presented as clearly as possible. According to the DEIS, “grizzly bears frequently and successfully establish home ranges overlapping similar levels of human activity in other parts of their range” (67). Our organizations would like the final EIS to express succinctly that our best available science suggests that current levels of recreational use are compatible with grizzly bear recovery.

Our request:

- Continue to avoid impacts to high use recreation areas and trails.
- Clearly state that long-term closures are not required.
- List the criteria for short-term closures; and
- Share the approximate number of closures that the National Park Service anticipates will be required annually when the NCE contains a recovered grizzly bear population.

Wilderness

Thank you for including a thorough discussion of the impacts of the action alternatives on wilderness character. We hope to continue to review the analysis on this important topic, as you move forward with this process.

Our request:

- The DEIS says that “Under the Wilderness Act of 1964, both the NPS and USFS would complete separate minimum requirements analyses to evaluate the necessity and impacts for all flights that require landing in designated wilderness lands under their management” (30). Please share these minimum tool documents when they are complete.

Agency Coordination

We understand that a federal agency may choose not to participate based in a NEPA process. This determination may be made based on staffing constraints. Under the relevant law “[i]n response to a lead agency's request for assistance in preparing the environmental documents, a cooperating agency may reply that other program commitments preclude any involvement or the degree of involvement requested in the action that is the subject of the environmental impact statement” (40 CFR 1501.8). However, our organizations were surprised by the United States Forest Service (USFS) determination to not be a cooperating agency. Given that the Forest Service manages a majority of the land in the NCE, we would like to know more about this determination and whether the USFS has the resources it needs to support the management of grizzly bears on national forest lands.

Our request:

- Please include a copy of the communication the Forest Service shared with the Park Service stating that they are unable to serve as a cooperating agency in the appendix of the final EIS.
- Share information on the current conditions of agencies in the NCE and their preparedness to administer lands with grizzly bears.

Role of Non-Profit Partners

An important component of the proposed action is increased education of the public about grizzly bears. Our organizations expect that recreation nonprofits will have a significant role to play in helping visitors learn about recreating in grizzly bear country. The DEIS states, “Ongoing public outreach by nonprofit organizations...would promote tolerance of and coexistence with grizzly bears by addressing public safety concerns and provide information about grizzly bear ecology and behavior” (32). If an action alternative is selected, we wish to work with you to coordinate messaging and maximize the effectiveness of our shared public education efforts.

Our request:

- Proactively work with the human-powered recreation community to create education and outreach materials and programs that can reduce the risk of conflict between humans and grizzly bears.

Thank you for considering our input. We look forward to continuing to work with you on this long term project. Please contact our organizations if you have any questions or would like to further discuss our feedback and perspectives.

Sincerely,

Michael DeCramer
Washington Trails Association
Policy and Planning Manager

Betsy Robblee
The Mountaineers
Conservation and Advocacy Director

Jason Keith
Senior Policy Advisor
Access Fund

Eddie Espinosa
Director, Community Programs
American Alpine Club

Thomas O'Keefe
Pacific Northwest Stewardship Director
American Whitewater

Yvonne Kraus
Executive Director
Evergreen Mountain Bike Alliance

