

WASHINGTON OUTDOOR ALLIANCE

Access Fund | American Alpine Club | American Whitewater
Evergreen Mountain Bike Alliance | The Mountaineers
Washington Climbers Coalition | Washington Trails Association

April 27, 2017

North Cascades Ecosystem Grizzly Bear Restoration Plan
c/o Superintendent Karen Taylor-Goodrich
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 98284

Submitted by online form at <https://parkplanning.nps.gov/commentForm.cfm?documentID=64266>.

RE: Washington Outdoor Alliance Comments on Draft North Cascades Ecosystem Grizzly Bear Restoration Plan & EIS

Dear North Cascades Ecosystem Grizzly Bear Restoration Plan Team:

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

The Access Fund, the American Alpine Club, American Whitewater, The Mountaineers, Washington Climbers Coalition and Washington Trails Association—all human powered recreation organizations in Washington State—come together as Washington Outdoor Alliance. As a coalition, we work on issues relating to recreation, access and conservation and represent more than 36,000 members who recreate on public lands.

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 volunteered at recreation sites for activities such as outdoor education and youth programs. The outdoor recreation economy in Washington State generates \$22.5 billion in annual consumer spending and \$1.6 billion in state and local tax revenue and directly employs 227,000 people in our state.

In a Washington Outdoor Alliance scoping comment letter, submitted on March 25, 2015, a number of issues around recreation, trails and public safety were requested for analysis in the EIS.

Washington Outdoor Alliance has reviewed the Draft North Cascades Ecosystem Grizzly Bear Restoration Plan and EIS and does not feel that these issues were adequately addressed in the EIS. Many of the issues below were vaguely identified and provided little detail or direction. Through the development of the Final EIS, we hope that these questions will be answered thoroughly as the draft EIS and plan makes it difficult to discern the actual impacts of the issues raised in our scoping comment

letter. Those issues are identified below. We believe that the draft plan and EIS is the appropriate vehicle through which this detailed analysis should take place.

Please closely analyze the following for inclusion in the final plan and EIS:

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 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.

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 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 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?

Furthermore, within the draft plan and EIS, we identified the following specific issues that we have questions about:

Interagency Memorandum of Understanding (MOU) (1997)

On page 46 of the DEIS, the following is stated:

“In July, 1997, the USFS and NPS agreed to an interim “no-net-loss-of-core area” policy for grizzly bear habitat on federal lands within the NCE. The agreement stipulated that the NPS and USFS agreed to an interim standard of no net loss of core area until the agreement is superseded by a forest/park plan amendment or revision. Core areas are defined as areas with the following characteristics: (1) No motorized use of roads and trails during the non-denning period. (2) No roads or trails that receive non-motorized, high-intensity use. (3) A minimum of 0.3 mile (500 meters) from any open road, motorized trail, or high use trail. The term “core area” was created in response to research showing that bears, notably females, avoid proximity to roads when and where possible, and therefore the presence, use and density of roads is a critical issue for management agencies to address (IGBC 1998).”

We understand that the policy suggested that this interim standard would be in place until the agreement is superseded by a forest/park plan amendment or revision. However, the DEIS is an appropriate vehicle for the interim policy to be analyzed and amended through the DEIS process.

As we understand it trails are treated as equals to roads under this policy, yet the MOU above discusses how bears avoid proximity and density of roads and is silent regarding trails. The on-the-ground effect is that it can be difficult to develop new trails.

Why were trails included in the policy when the research referred to roads? Is there science to back trails being included in this policy? If not, we request that the reference to trails be removed through the EIS process.

Visitor Use and Recreation Experience

On page 94 the following is stated: "Restoration actions could also affect commercially guided backcountry recreation such as mountain climbing, horse packing, and other guided uses." No details are provided regarding potential impacts to commercially guided backcountry recreation beyond this sentence. Please provide more information regarding the impacts to outfitting and guiding in the final EIS.

Potential Release Areas and Recreational Sites in the North Cascades Ecosystem

On page 124 in the DEIS, Figure 13 displays a map with potential staging and release areas and recreational sites. We find the map inadequate as the only recreational sites presented are those within the North Cascades National Park Complex while the staging and release areas extend beyond the park complex and into the Mt. Baker-Snoqualmie and Okanogan-Wenatchee national forests. In addition, the only trails that appear on the map are the Pacific Northwest and Pacific Crest national scenic trails while many trails exist in the park complex and national forests.

In the final EIS, please provide a map displaying all recreational sites, including campground, trails, major roads and other recreational sites.

Management of Roads and Trails

On page 125 of the DEIS (and repeated throughout the DEIS), the following is provided:

"Closure of park or forest facilities and main roads are not expected to occur. Given that only two trails were temporarily closed on national forest lands in the NCDE because of grizzly bears in the 10-year period from 1990 to 2000 (FWS 2016d), it is reasonable to assume that any trail and area closures would be temporary, localized, and limited."

Given the potential impacts to roads and trails, which could limit recreation in the North Cascades ecosystem, please provide the following details in the final EIS:

- How is "main roads" defined?
- Will other roads that are not classified as "main roads" be closed through the restoration process?
- How is "temporary, localized, and limited" defined?

Conclusion

Thank you for considering our comments on the Draft North Cascades Ecosystem Grizzly Bear Restoration Plan and EIS. Please let us know if you have any questions or if we can be helpful.

Best regards,

Eddie Espinosa, *Northwest Policy Advisor*, American Alpine Club

Katherine Hollis, *Conservation and Advocacy Director*, The Mountaineers

Andrea Imler, *Advocacy Director*, Washington Trails Association

Thomas O'Keefe, *Pacific Northwest Stewardship Director*, American Whitewater

Matt Perkins, *Board Member*, Washington Climbers Coalition

Joe Sambataro, *Northwest Regional Director*, Access Fund

Yvonne Kraus, *Executive Director*, Evergreen Mountain Bike Alliance

cc: John McCauley, *Regional Director*, Outdoor Alliance