



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

October 24th, 2019

Draft Grizzly Bear Restoration Plan Environmental Impact Statement Comments of Conservation Northwest:

Conservation Northwest is adding the following comments to those previously submitted in March 2017 by Conservation Northwest and National Parks Conservation Association. National Parks Conservation Association is not a signatory to this addendum.

Our support of Alternative C remains strong as we consider it the best option for realizing the objective of restoring grizzly bears to the North Cascades over time. In the intervening years the communications we've had with several grizzly bear research biologists have only strengthened our support for this alternative.

We ask that you consider these additional comments in the context of agency outreach and education components of the DEIS.

In the months since the close of the last comment period we have listened to supporters and opponents alike about grizzly bear recovery in the North Cascades in an effort to understand some of the major reasons for opposition, in particular. Anecdotally at least, it seems as though that despite the dozens of public meetings and comprehensive information on agency websites related to grizzly bear behavior, ecology and habitat, and the range of processes available to the agencies for grizzly bear restoration, many people still have inadequate understanding of these issues.

While we acknowledge the significant outreach and information effort the agencies have made, we've concluded that it might be beneficial, resources permitting, to try to address some of the concerns of those who sincerely want to better understand the animal and the recovery process; and what it may mean to them and to counteract statements of those who see grizzly bear recovery as another wedge issue to be exploited for their own political or ideological gain.

We suggest that the agencies consider some creative outreach strategies to improve online communications, specifically through social media outlets with easily digestible content. As well your agencies might consider submitting simple point by point articles in local newspapers that address each of the below points of controversy – not from the standpoint of advocating for a specific alternative but simply to correct some of the more common but damaging falsehoods and exaggerations that gain traction, particularly in rural communities.

Content may address some of the more common questions around habitat suitability, (e.g. does the NCE contain adequate food sources for a viable grizzly bear population?); connectivity with Canadian bear populations/natural recolonization (e.g. if the habitat's so good in the NCE, why

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don't all those Canadian bears move down and stay here?); relative danger of bear attacks to the host of other threats to human safety in wilderness areas, with examples from other ecosystems where grizzlies are more common; behavioral differences between black bears and grizzly bears; ecological, ethical and legal reasons for restoring grizzly bears to the NCE; economic health of communities around, and human use of backcountry areas in occupied grizzly bear habitats (e.g. plotting backcountry tourism trends with grizzly bear population growth in the Yellowstone Ecosystem and Northern Continental Divide ecosystems). We realize that most of this content is already posted on the project and agency's websites but maybe it should be more upfront so to speak.

Content could be posted in issue-specific pieces, through short videos, synopses of research papers, interviews with expert and non-expert backcountry users and especially in gateway communities near the Recovery Zone. It might also be beneficial to tell the story of the 28-year history of the Cabinet/Yaak recovery effort, through bear translocations, more widely and effectively (a short film is available). That effort is a huge success story from the biological, social and process standpoints. It is the best counter-narrative to the misleading, fear-based, hyperbolic and blatantly false narratives that many opponents are perpetuating.

We are reasonably sure that there are independent film makers, bloggers and non-profit organizations that are willing to partner in such efforts.

Previously Submitted March 2017

The undersigned organizations support Alternative C as identified in the Draft Environmental Impact Statement (DEIS) with the addition of more specificity regarding adaptive management and future transplants (see below).

The undersigned groups fully support grizzly bear restoration in the North Cascades ecosystem (NCE) and the stated intent of the DEIS, "to determine how to restore the grizzly bear to the North Cascades Ecosystem, a portion of its historic range", and the objectives of taking actions as identified in the document.

We agree that the question is not whether to recover grizzly bears, but how to recover them. The science is clear and the course of action is obvious and unequivocal: transplanting some number of bears into the NCE is the only defensible strategy if the objective is grizzly bear recovery. Such actions could be the formative steps toward one of the greatest conservation success stories in the last century.

General and Background Comments

Grizzly bears now occupy approximately only 2% of their former range. If all the Grizzly Bear Recovery Zones (GBRZ) were occupied to their full carrying capacity it's estimated that grizzly bears would then occupy roughly about 4% of their former range in four states (IGBC).

Presumably, if those population goals were met, the federal government would then move to delist grizzly bears from the endangered species list, and for legal purposes define grizzlies as "recovered" in the lower 48 states. This perspective is important context for public engagement.

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We acknowledge that it's not the purpose of this EIS to address or otherwise remedy the extirpation of grizzly bears from 96% of the animal's former range. However, this EIS does provide a mechanism for some measure of local recovery that will benefit the species more broadly. If we can contribute in some small way to partially reversing such an enormous loss by restoring grizzly bears in Washington State, we must embrace that opportunity and follow the science where it leads.

It's also especially important we recognize that all our efforts to conserve and recover grizzly bears are concentrated in the Rocky Mountains and that species distribution matters (*B. McLellan, M. Proctor, pers. comm. 2016*), particularly with a changing climate and its potential impacts to regional ecosystem. Moreover, if progress is made restoring grizzly bears to the NCE with pro-active measures we believe it would generate significant momentum catalyzing habitat and other grizzly bear conservation needs in British Columbia for this trans-boundary grizzly "population".

Relatedly, if endangered grizzly bear populations southwest British Columbia and Washington are extirpated this would represent further loss of several thousand square miles of grizzly bear range and distribution at the southern edge of the species' range in the west. Such a loss would be inexcusable given our knowledge, highly educated public and conservation resources; especially tragic given the iconic stature of the species and its significance for ecosystem health and conservation values.

It is our moral responsibility to restore grizzly bears to the North Cascades, as it is with any species that human beings have diminished or extirpated, and where ample suitable habitat still exists or can be restored. The Endangered Species Act underscores that responsibility and congressional intent. All the pieces are in place to accomplish the goal.

Polls related to grizzly bears in the North Cascades, endangered species generally and the laws that protect them indicate the vast majority of Americans recognize and embrace this responsibility of species restoration and are deeply connected to our wildlife and wild lands. (Tulchin Research, 2015; Hart Research, 2017; Tulchin Research, 2016)

Anecdotally, our interactions with members and supporters indicate that they recognize the intrinsic value of that wildlife without regard to species. People want healthy populations of all our native species. Both humans and wildlife depend on functioning natural systems *in local areas*. It's not good enough that grizzly bears and their values exist elsewhere. The presence of wildlife, like the grizzly is a key indication that the ecosystems on which we all depend are healthy, vibrant and diverse places that are enormously beneficial to human beings and our quality of life.

Along with salmon, grizzly bears may be one of the best indicators of ecosystem health because of their large home ranges and dependence on a wide array of foods and elevational gradients and ecological zones and disturbance sensitivity as recognized in the DEIS.

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Grizzly Economics

In addition to ecosystem health, the economic impact of wildlife viewing can be significant. People love to see wildlife and spend lots of money to do so. According to the US Fish & Wildlife Service survey from 2011, spending on wildlife viewing away from the home totaled more than \$22 million nationwide (US Fish & Wildlife Service, 2011).

We acknowledge the difficulty of quantifying the tourism-based economic benefits of any species; and the pitfalls of comparing disparate areas like Yellowstone (\$10 million), British Columbia (\$6.1 million/year) and the North Cascades vis-à-vis grizzly bear driven tourism dollars. But studies do indicate that grizzly bears provide a significant net economic benefit at some point (Richardson, 2014; Swanson, 1994; Parker, 2003). The Bitterroot DEIS estimated grizzly driven net economic benefits to eventually total from around \$40 -\$60 annually (DEIS, Bitterroot Ecosystem, 1997).

But the DEIS seems to down play the potential economic benefits of grizzly bears to associated communities and leaves the general impression that the benefits are neutralized by the downsides. We have found no data to support that conclusion.

Given that some people oppose grizzly recovery based on the perception that it will negatively impact tourism and other economic activities, we believe it would be worthwhile to highlight those data going forward and estimate some potential range of benefits for NCE communities if possible.

Also, *“In Alaska, both residents and non-residents valued trips more when bears were seen than when other wildlife species were seen (Miller et al. 1998). A recent review of wildlife ecotourism identified brown/grizzly bears as the most targeted species for ecotourism in North American and Europe (Penteriani et al. 2017).” NCE DEIS Comments of the National Wildlife Federation, 2017.*

Alternatives

Alternative A, the “No-Action” option represents present day conditions, since the grizzly bear was listed under the Endangered Species Act in 1975. *No Action* has not resulted in grizzly bear recovery in the decades since the bears’ listing. In fact, verified sightings and physical evidence have become rarer in that time (North Cascades DEIS). As the DEIS states, there is no grizzly bear cavalry to come to the rescue of our North Cascades grizzlies.

The International Union for the Conservation of Nature (IUCN) Bear Specialist Group, including North American grizzly bear biologists Drs. Bruce McLellan and Michael Proctor, has recently recognized the trans-boundary North Cascades grizzly bears as “Critically Endangered” through the application of Regional Redlist criteria—a measure of the extinction risk of geographically isolated brown bear populations. The globally accepted IUCN approach is effective for identifying grizzly bear populations most threatened with extirpation by geographic isolation and very low numbers. The report lists eleven Critically Endangered brown bear populations in the world, one of which is the North Cascades (fewer than 10 bears) and two others that are

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immediately adjacent to the NCE in British Columbia, including the Stein-Nahatlatch (15-25 bears) and Fountain Valley/Hat Creek.

The IUCN determinations and our own work in southwest British Columbia (and as articulated in the DEIS) underscore the grizzly bear situation: that populations between the Fraser River and Okanagan Valley are highly fragmented, few in number and movement restricted by significant habitat fractures (see below). Thus, natural recovery or the “No Action” alternative is not feasible if the goal is to recover grizzly bears in the North Cascades.

Moreover, Alternative A fails to meet the purpose and need statement which requires the agencies to implement a plan that will:

- Avoid the permanent loss of grizzly bears in the NCE.
- Contribute to the restoration of biodiversity of the ecosystem for the benefit and enjoyment of present and future generations of people.
- Enhance the probability of long-term survival of grizzly bears in the NCE and thereby contribute to overall grizzly bear recovery.
- Support the recovery of the grizzly bear to the point where it can be removed from the federal list of threatened and endangered wildlife species. (North Cascades DEIS)

Although we acknowledge the benefits of all three Action Alternatives, we support Alternative C as the most efficient and defensible option. This alternative would most effectively realize the objectives of the grizzly bear restoration effort and the DEIS, with the stipulation that future bear transplants are tied more explicitly to maintaining a desired annual population growth rate.

We are concerned that Alternative B presents too high a risk of demographic failure due to the small number of individual bears initially.

Alternative C strikes a sound balance between the biological and social sciences of grizzly bear conservation and restoration—in other words, to satisfy the concerns of some people while providing a viable strategy toward restoring bears. It would allow for an adequate number of grizzly bears to be added to the ecosystem to restore reproduction that will increase with adaptive strategies over time¹.

Simultaneously, Alternative C will allow the public to see its many benefits and relatively few costs and allow communities time to get accustomed to the idea of sharing the sprawling North Cascades wildlands with a handful of grizzly bears. Grizzly bear recovery is equal parts social tolerance and biological science.

¹ Another option would be to release 5-7 bears each year for 2 years and then monitor for another 2 years to learn about the area and how the bears use it (learning period) and then add another 5-7 bears a year for another 2 years or until you reach your initial target population of 25 bears. Pers. comm. Bruce McLellan.



Alternative C also acknowledges the difficulties involved in finding and trapping enough grizzly bears of optimal age and gender to satisfy an accelerated approach and the upfront costs, as those are outlined in Alternative D.

As emphasized in the DEIS, ultimately the North Cascades is an island ecosystem with little or no ecological connectivity to the grizzly meta-populations of British Columbia. To that end, a longer-term goal should be to explore collaborative efforts between US and state wildlife agencies, Landscape Conservation Cooperatives, First Nations, ENGOs and British Columbia ministries to identify and mitigate the problematic fractures in wildlife movement in the region. The Coast to Cascades Grizzly Bear Initiative (www.coasttocascades) is working with several British Columbia First Nations to restore threatened southwest British Columbia grizzly bear populations by reversing the combined effects of habitat fragmentation, and is a willing partner in an effort to support decreased habitat fragmentation with a growing population of grizzly bears in the NCE.

Acknowledging that the intent of the adaptive phase of the strategy under Alternative C may be to achieve an annual population growth target, we recommend this objective be adopted and clearly articulated in the alternative. Some may dispute bear transplants, therefore it may help to further contextualize recovery generally and transplants specifically in terms of bear densities during the process and after recovery goals are achieved; how NCE densities compare with other occupied grizzly bear systems; and the spatial and temporal perspectives of a recovering grizzly population.

Endangered Species Act Section 10(j)

We support proposed rule-making to append ESA Section 10(j) to any action recovery alternative except Alternative B, particularly if it will help gain support of and participation in the other action alternatives by stakeholders and managers, and as long as recovery remains the goal. We assume that a more thorough discussion of a proposed 10(j) rule will be explored in the FEIS.

Other Considerations

- The DEIS is explicit with regard to ethnographic benefits of grizzly bear restoration. We want to emphasize the need to conduct recovery in close consultation with Tribal governments and in full recognition of Treaty rights and tribal access to traditional use areas for hunting, fishing, gathering and ceremonial purposes.
- We suggest adding “restore ecological function” to the objectives of the EIS and the restoration of grizzly bears.
- We support mandatory bear species identification training for hunters. It could be patterned after Montana’s online version.
- We support ongoing outreach and education up to and beyond the release of the FEIS and are receptive to partnerships with government, Tribes and community groups. It might also be useful to have ranchers, guide outfitters and others from grizzly bear occupied areas like Montana, Wyoming and British Columbia to speak to rural communities in



Washington, adjacent to the GBRZ. It might help gain more acceptance for recovery of the grizzly bears and necessary recovery actions.

- It might also be helpful to highlight Europe where there are an estimated 50,000 brown bears (14,000 outside Russia) as an example of humans and bears coexisting in high human densities and where several of those populations have been reestablished through transplant strategies.

Acknowledgements

We applaud the efforts of the National Park Service, US Fish & Wildlife Service, the US Forest Service and the Washington Department of Fish & Wildlife and the IGBC NCE subcommittee and Technical Team and the individuals who have contributed to the DEIS and public understanding and awareness of grizzly bears and their place in the Pacific Northwest; and for maintaining the vision of grizzly bear recovery in the NCE and the state of Washington. Most importantly for helping to keep the NCE and the PNW wild and up to the standards of grizzly bear conservation and habitat integrity. Grizzly bears are at least partially responsible for the enormous recreational and wilderness values found in the NCE which in turn benefits our quality of life and vibrant PNW economy.

Signatory Organizations

Conservation Northwest is a not for profit organization with 10,000 members and supporters. CNW 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, and committed significant resources to restoring grizzly bears to Washington and the North Cascades.

Conservation Northwest also works with First Nations, ENGOS, scientists and government to recover threatened grizzly bears in southwest British Columbia as the Coast to Cascades Grizzly Bear Initiative. And we are part of the Leadership Team of the Cascadia Partner Forum, a collective of ENGOS, independent scientists and agency staff from British Columbia and Washington. The CPF formed to identify obstacles and recommend solutions to problems that negatively impact ecological function, habitat permeability and resilience to climate change. The grizzly bear is a CPF focal species.

NPCA is an independent, nonpartisan, non-profit organization that, together with more than 1.2 million members and supporters, works to protect and preserve our nation's national parks for present and future generations. Our members and supporters regularly visit and use national park sites, and appreciate the native species that live in our parks. Thus, NPCA is interested in conservation efforts to protect the grizzly bear, which has roamed the North Cascades for over 20,000 years.

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