

To: Superintendent

North Cascades National Park Service Complex

810 State Route 20,

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From: Everett Burts, Biological Scientist retired

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Reference: Draft Grizzly Bear Restoration Plan / Environmental Impact Statement/ North Cascade Ecosystem

Please consider the following as my comments:

Option A is the only reasonable option. The plan is flawed and must be revised before options B, C or D can be implemented. The plan must be revised and publicized, and a new public comment period provided. There are legal issues with options B, C and D that need to be reconciled with Washington State's Attorney General and Department of Fish and Wildlife.

The DEIS has many shortcomings:

1. There are many invalid assumptions made, i.e. assuming furs brought to trading posts during the fur trade era indicates they were harvested in the North Cascade Ecosystem. Other evidence of historic grizzly populations presented is anecdotal, and of little value.
2. *"Released bears and their offspring will stay in the north portion of this ecosystem."*
"Released bears and their offspring will use the entire ecosystem." (It can not be both

ways.)

3. *“The effects of reestablished grizzly populations on tourism will be neutral. Visitors avoiding the area because of grizzly bears will be offset by those going there to see these animals.”* Successful bear watching requires visiting sites where bears are concentrated i.e. salmon spawning sites, garbage dumps. Even 200 bears in the ecosystem would provide little chance of human visitors finding one.
4. The DEIS does not adequately address the consequences of establishing a Grizzly bear population on “Gateway” communities. Several communities or private businesses were not considered i.e. Stehekin, Lake Wenatchee, Lucerne, Holden Village.
5. No evidence is presented indicating introduction of Grizzly bears will restore or maintain key ecosystem resources or functions that have been degraded or impaired due to their absence. Because there is no valid proof that Grizzly Bears ever existed in plan-goal numbers, it is not possible to predict their impact on this ecosystem.
6. The plan has no sunset clause or budget cap. If attempts do not meet expectations within reasonable time or a fixed budget, the project must be abandoned. Proof of progress should be required annually.
7. The plan does not adequately address effects of reestablished Grizzly Bears on WDFW efforts to conserve endangered or fledgling populations of Cariboo, Moose, Big Horn Sheep and other species.
8. There are no criteria for delisting Grizzly Bears in Washington, thus WDFW will not be allowed to manage them as a state resource.