GB-Letter- points to consider

Outline for public comments for the DEIS Grizzly Bear Restoration Plan North Cascades Ecosystem. Each of the points below will address Option A, B, C, and D in detail.

Outline:

1. The DEIS does not adequately address the consequences of establishing a Grizzly bear population in the North Cascades Ecosystem to "Gateway" communities adjacent to the NCE.

2. The DEIS does not establish a compelling and essential need to introduce Grizzly bears into the NCE based on the current status of the species in the western United States

3. The DEIS does not provide compelling evidence that introduction of Grizzly bears into the NCE will restore or maintain key ecosystem resources or functions that have not been degraded or impaired due to their absence.

4. EIS Does not take into consideration the five wildfires that have occurred nor the ecological impact.

5. Survey results did not include locals within the impacted area.

6. Bears already exist in the ecosystem and no experimental should be allowed

7. Square miles of study area does not match the necessary need of the species

8. Taking grizzly bears from another system that is not delisted is considered a mortality, thus postpones the delisting of the species nationally and in the study area the bear is removed even though the bear is still alive.

9. No funding exists to implement the EIS for the NCE.

10. Recovery of 60-100 years at what financial cost?

11. EIS Does not mention loss of road infrastructure.

12. Recovery areas are too close to populations based on grizzly range.

13. State Law on no transplantation and listening to the public. Bills passed overwhelming support. DEIS promotes Supremacy Clause of the US Constitution Article VI, Clause 2 in addition to the property clause of the US Constitution Article IV, Section 3 Clause 2 for jurisdiction of federal lands to allow, but does not explain if State has options to haze animals back onto federal lands and away from the 10% state land and 5% private in the DEIS study area.

14. Does not address local law enforcement conflict measures that will be necessary and a Section 6 agreement?

15. Grizzly Bears are coming back naturally

16. Want 36% of the Yellowstone Population in WA EIS area with 1/3 the habitat.

17. EIS Says will give people chance to see grizzly is not a reason for transplantation.

18. EIS calls out support for environmental and natural resource objectives, but does not identify the objective.

19. Motorized access to areas closed in certain areas per EIS.

20. Transplanted bears have a tendency to leave the area and go back to original location depending on age of the bear.

21. Female grizzly breeding does not begin until age 6, transplanted bears the EIS proposes are ages between 2-5.

22. DEIS proposes single and multiple site transplantation locations and all are in the northern half of the North Cascades Ecosystem and none within the southern and all near Canadian border that would cause counts of bears to be off just as wolf counts when den is on the other side of border.

23. Current DEIS contradicts Grizzly Recovery Plan from June 24, 1997.

24. DEIS does not give a stated number of Grizzly Bears to consider the species no longer endangered.

25. ESA 10(j) rulemaking calls for an experimental population under the DEIS, but experimental populations cannot be located into an area where bears currently exists per their own rule.

26. DEIS did not do a full impact study of ungulates and competing species for the same ungulate, I.E. Wolf, Cougar, Canadian Lynx.

27. DEIS did not consider impact to endangered fish species within the study area dismissing it as they will be getting bears from areas where fish are not prominent. DEIS says "there should be a high likelihood that candidate bears do not rely on salmon". It's about the total food source.

28. Public Safety concerns are significant.

29. Reintroduction brings additional regulatory environments that will be detrimental to current land use.

30. After federal introduction is done would transfer to State WDFW for funding of which none has been allocated at approximately $1.8 million per year.

31. Impacts to livestock and other commodities.

32. Initial public scoping process did not include the county commissioners of the impacted counties as required under coordination laws of the US until after the DEIS was drafted and put out for publication.

33. The study area is 9,800 square miles but the habitat for 200 bears would be at a minimum 9,000 square miles and a maximum of 36,000 square miles. (State and private lands are in the area)

34. DEIS will not delist until "state and federal agencies demonstrate their commitment to implementing the conservation strategy (FWS 2015a). Strategy is not defined.

35. All three US Forest Service regions included in the DEIS have not completed their forest management plans that the DEIS specifically relies on for the assessment to translocate bears. Plans have not even been

submitted for public comment. How can the DEIS rely on unpublished plans?

36. DEIS specifies a number of times that "one human injury caused by a grizzly bear has been recorded in the last 36 years within the 5 study areas in the US". This is absolutely false.

37. DEIS links grizzly bear habitat loss to climate change and human activity within the area.

38. DEIS contradicts itself on the total number of Grizzly Bears within the DEIS range on pages 5 and 17.

39. DEIS calls for additional land acquisition to permanently conserve habitat as a management option.

40. Release location is to close to communities and populations based on range (Steheiken, Loomis, Mazama, Darrington, Marblemount, and others).

41. Olympics were not considered as part of a statewide plan to restore endangered population and historic territory.

42. Grizzly Bear Recovery plan June 24, 1997 supplement to NCE plan says grizzly has high probability of extirpation (articles and own DEIS documents show a population).

43. Current DEIS does not cover continued human development in study area June 1997 plan does.

44. June 24 questioned recovery zone size as if it was enough and the answer is extremely troubling when it says "There exists no system to evaluate the amount of habitat necessary to maintain a viable grizzly bear population. The question of how much space is needed for grizzly bear recovery is essentially a question of risk". This acknowledges that they expect human conflict within the area and are willing to take human life risk to keep a zone.

45. Significant concern around Agriculture and Livestock.

46. Economic impacts consideration to high risk areas.

47. According to Servheen of US Fish and Wildlife and in the paper Bear Reintroductions: Lessons and Challenges "Reintroduction is a costly and time-consuming enterprise, with only about 11% of all species reintroductions resulting in viable populations". Why the rush to place them in Washington State?

48. DEIS does not address the acclimation period of the transplanted bears.

49. Prospect of local ranchers grazing allotments being acquired or revoked, I.E. Selway-Bitterroot example.

50. NPS Document from Sedro-Wolley office discussing Grizzly says "There is no direct information about the grizzly bear diet in the North Cascades" and "There have always been grizzly bears in the North Cascades Ecosystem". This conflicts with the DEIS.

51. Discuss WSU-DNR Sciences study Where are the North Cascade Grizzly Bears and the 107 confirmed sightings between 1986 and 1999 in direct conflict with the DEIS.

52. Grizzly in Chesaw WA and details as within the NCE Grizzly habitat range per the DEIS.

53. Concerns in that to capture a bear for transplantation they use a scent of liquid fish and cattle blood (Woods et al 1996).

54. DEIS only sampled 11% of the North Cascades for study for bear transplantation and not the entire ecosystem.

55. DEIS includes a picture of a black bear in place of a grizzly bear which I thought was funny because the entire document is about grizzly bears and the photo is not sourced to say grizzly so someone who does not know the difference might think it is a grizzly.