

February 24, 2017

To: Karen Taylor-Goodrich, Superintendent, North Cascades National Park Service Complex

To: Eric Rickerson, State Supervisor, Washington Fish and Wildlife Office, U.S. Fish and Wildlife Service

Regarding your Grizzly Bear Restoration Plan DEIS, a quick review of Chapter 4, Environmental Effects, tells me that you have a very vulnerable DEIS that fails to address basic NEPA principles. Under litigation, I believe your plan would not pass a basic legal reading of NEPA. Here are examples of weaknesses in the analysis that I identified after just a 30-minute review of your DEIS:

“Potential adverse impacts on black bear population dynamics following restoration of a grizzly bear population are unclear.” (chapter 4, Page 103)

It is the duty of NEPA to make the potential effects of an alternative clear. Simply stating that effects are unclear and describing the degree of confusion to the reader is not the point of NEPA.

“Under alternative B, initial restoration activities would not disturb fish habitat. The number of grizzly bears in the ecosystem would be very small (approximately 10), and the population is expected to remain confined to the northern portion of the NCE. Fish are not expected to be a primary food source, and the number of grizzly bears in the ecosystem would not be sufficient to generate any adverse impacts on fish populations as a result of predation.” (Chapter 4, Page 105)

Based on the unsupported assumption that introduced grizzlies are not expected to move to the southern portion of the NCE, the DEIS concludes that no effects on trout are expected. No evidence is presented that grizzlies are not expected to move south. What effects on trout will be experienced if the assumption proves invalid? The EIS does not even mention effects on ESA-listed salmonids that occur within the NCE. If a grizzly moves to the south of the NCE and eats even one salmon, you've introduced a significant effect that is not even addressed in the DEIS.

“Ultimately, Mattson (1997) concludes that grizzly bear predation rates average between 1.4 and 5.8 ungulates per year for adult female and male bears, respectively.” (Chapter 4, Page 101)

What if these ungulates eaten by introduced grizzly bears happen to be Mountain Caribou? Why is there no mention of effects on caribou? The North Cascades caribou population has been extremely tenuous. Why is the USFWS abandoning its efforts to reintroduce caribou, only to pursue reintroduction of one of its predators? Why is the long-term caribou re-introduction effort not even mentioned in the DEIS?

“As grizzly bears increase in number over time and begin to use habitat over a larger area of the NCE, the potential for humans to encounter them would exist over a greater geographical range, which could provide benefits for those visitors hoping to experience grizzly bears in the natural environment, while dissuading some other visitors from recreating in the NCE.” (chapter 4, page 125)

In this section, the DEIS speaks about the benefits to recreation of grizzly bears expanding throughout the NCE. In the section about trout, the grizzlies are not expected to spread to the south. You contradict yourself in the same chapter to promote a beneficial effect to recreation while minimizing an effect on trout. This is not objective environmental assessment.

“Adverse impacts associated with intermittent, brief disruptions to visitor use that may be associated with certain activities (e.g., helicopter flights) would be offset by the benefits of grizzly bears being restored to a native ecosystem.” (chapter 4, page 127)

Here’s an example of countervailing effects. The Council on Environmental Quality warns about basing a decision on these kinds of comparisons. A decision maker can make those kinds of assessments in the decision, but a contractor preparing an EIS has overstepped its role by pointing out offsetting effects for the decision maker.

“A large number of bears is unlikely to leave the NCE; it is more likely that individuals dispersing or attracted to human uses could adversely affect socioeconomic resources. Given the large diverse economy of Washington, bears are unlikely to have any noticeable impacts, although individual landowners could experience impacts.” (chapter 4, page 153)

Again, what information does the DEIS provide that the bears are unlikely to leave the NCE? Is this the same information used to assume that the bears are not likely to spread to the southern portion of the NCE?

Considering the weakness of the DEIS analysis, I highly recommend that the decision makers review the contract provisions and require the contractor to prepare a new DEIS that meets basic NEPA standards. If I could see the failings in this analysis in just a short review, your analysis will be weak under legal challenge.

Sincerely,

Alicia Andrus

Joseph, Oregon