

03.05.2017

To Whom It May Concern,

Here are my comments on the Grizzly DEIS. Listed below are areas I believe the DEIS is inadequate and actions necessary to correct them.

Unsupported Finding / Assumption: The NCE once had a robust grizzly population. The analysis of the data presented to claim that the NCE once had a substantial population of grizzly is flawed. Relying primarily on the Sullivan Report, the DEIS draws a conclusion not based on the material presented. The Sullivan Report actually states that the grizzlies counted in the historical record overwhelmingly came from Fort Colville, near the Selkirk range, where a grizzly population lives today. It appears most likely that the random grizzly sightings in the NCE refer to migrant bears passing through the area from the Selkirk Mountains and British Columbia.

Action necessary to address this unsupported assumption: The DEIS needs to adequately plot the historical bear sightings and grizzly hide counts on a map, matching the location and numbers of grizzly to as specific locations as possible. Township and range locations are too broad and vague. Showing the number of grizzly hides from the different Hudson Bay Trading posts and their locations is imperative.

Unsupported Finding / Assumption: The impact of introducing grizzlies upon wildlife will be neutral. The data presented to make this claim is inadequate. The DEIS states that male grizzlies eat 70% meat. The DEIS also states that the grizzlies won't have a significant impact on the ungulates because of their large population. But where are these ungulates located? Are they located in sufficient numbers in the proposed release areas? If not, bears will move to where the ungulates are or they will fail to thrive. In addition, will the impact on the existing population of black bear really be neutral? Retired biologist Everett Burts believes black bear will be pushed out of their habitats by grizzly. The DEIS is silent on this possibility.

Action necessary to address this unsupported finding: The DEIS must map the NCE ungulate population locations and adequately address the potential impacts on black bear. In addition, the DEIS should map the territory requirements of 200 grizzly bear and study how they relate to the ungulate population and black bear population distribution.

Unsupported Finding / Assumption: Impact of introducing grizzlies upon visitor usage will be neutral. The DEIS makes this unscientific and inane statement: "... benefits for those visitors hoping to experience grizzly bears in the natural environment, while dissuading some other visitors for recreating in the NCE." This frivolous statement is disturbing in an EIS. The fact that the DEIS has made no attempt to gather survey data from visitors to the North Cascades National Park regarding the relocation of grizzly bear is a glaring and alarming omission.

Action necessary to address this unsupported finding: Perform an in-depth survey that objectively evaluates visitor and potential visitor perceptions of introducing grizzly into the NCE and incorporate the results into the EIS.

Unsupported Finding / Assumption: The relocation habitat will support 200 grizzlies. This assumption made by the DEIS is all important. If it is incorrect, the grizzlies are being set up for failure. The DEIS has the burden of proof. On the face of it, the finding that the target habitat could support 200 grizzlies is counterintuitive. Grizzly populations are currently sustained in the Selkirks and British Columbia, but not in the NCE. Why is that? Thus the methodology and findings of the studies supporting the DEIS claim need to be thoroughly studied and vetted.

Action necessary to address this unsupported finding: The DEIS citizen response timeline needs to be extended to allow for the thorough review of the habitat data referenced by the DEIS.

Other issues regarding the insufficiency, inadequacy and inaccuracy of the DEIS.

The DEIS doesn't establish a tangible need for the grizzly relocation project. This language, purporting the benefits of the program, appears several places in the DEIS: "...provide lasting benefits regarding visitors' experience of nature through the reestablishment of a native species that has not had a viable population in the NCE for many years." This vague and unsupported statement is not specific, objective or data driven.

Action necessary to address this unsupported finding: The DEIS should be required to state clear, objective, data-driven benefits of this program. Amend the DEIS to do so.

The DEIS doesn't mention Stehekin as a gateway community. How is that possible? How is it possible the DEIS doesn't address the consequences of introducing grizzly to the Stehekin's backyard and not even include them on the map of gateway communities?

Action necessary to address this inadequacy of the DEIS: Include Stehekin as a gateway community. Conduct a thorough, in-depth survey that objectively evaluates Stehekin resident perceptions of introducing grizzly into the NCE. Explain how Stehekin was omitted as a gateway community in this DEIS to reassure the integrity of this process.

The DEIS doesn't adequately represent the legislative history that gives priority to recreational values over other uses. The DEIS should address that importing grizzly bears to Washington is illegal, according to state law. The DEIS should tell the entire legislative history that is relevant to the grizzly program in the body of the DEIS, not buried in the appendices.

Action necessary to address this inadequacy of the DEIS: Amend the DEIS to provide a comprehensive presentation of all legislation relevant to the grizzly relocation proposal.

Inadequacy of the DEIS public input process: The process to carefully control public input by not facilitating input from a public forum format has effectively reduced the amount and quality of public input to the detriment of the process.

Action necessary to address this inadequacy of the DEIS input process: The public input timeline should be extended and public forum style meetings should be scheduled to improve the public input process.

The DEIS doesn't estimate the costs and weigh the opportunity costs of this program: Every dollar spent on the grizzly relocation project represents a dollar less for the ongoing management, maintenance, capital improvements and programs for the North Cascades National Park which could have potential environmental impacts. This has not been considered by the DEIS.

Action necessary to address this inadequacy of the DEIS regarding the environmental impacts of the costs of the grizzly recovery program: Evaluate the costs of the grizzly relocation program, the sources of funding, the impacts on budgets and consequences to existing operations with particular regard to potential environmental impacts.

In conclusion, the DEIS is sufficiently flawed to require a complete revision to ensure it meets its legal and contractual obligations and fulfills its purpose. Its findings are poorly supported by inadequate analysis from insufficient evidence, producing questionable output. There are numerous areas of glaring omission that are distressing and unacceptable.

Sincerely,

Clint Campbell

156 Grandview Lane

Chelan, WA 98816