

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

The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents  
**WALLOWA COUNTY**

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March 7, 2017

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The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents. This letter responds to your request for comments on the North Cascades Grizzly Bear Restoration Plan DEIS.

Wallowa County has a history of collaboration with federal agencies regarding actions on public lands within our county. Our approach is grounded in the Wallowa County Salmon Habitat Recovery Plan, which is adopted into our County Land Use Plan. Your DEIS shows not only the absence of collaboration with local communities but also disregard for local concerns in the rush of releasing a DEIS before the administration changed in Washington DC.

We suggest the National Park Service and USFWS abandon the current DEIS and return to the basics of collaboratively developing issues and alternatives that respond to the concerns of local citizens, businesses, and organizations. Your future credibility as a public agency depends on it.

When you rework the analysis, we suggest you recognize how baffling your DEIS is to the reader. From the Western Wildlife Outreach website, we understand that contracts were awarded in the amount of \$550,000 to

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The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents prepare this DEIS. A tremendous amount of taxpayer money was spent on a document riddled with obfuscation, conflicting information, and glossed-over concerns. We outline problems with the DEIS below.

### Purpose and Need

This section provides no information that action is even needed. According to Page 3,

*Because the NCE grizzly bears are at risk of local extinction, action is needed at this time to avoid the permanent loss of grizzly bears in the NCE.*

At first glance, this might be a reasonable answer to the question that the purpose and need should answer . . . Why here? Why now? But, then the DEIS blows a hole in this argument by stating on Page 6,

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Under alternative B, there could be some adverse impacts on residents

*. . . there is no confirmed evidence of current grizzly bear presence within the NCE grizzly bear recovery zone in the United States.*

The paragraph continues to describe that the only confirmed sightings in the North Cascades Ecosystem in the last decade were in British Columbia, and the possibility for the meager grizzly population in Canada to emigrate to the US is negligible. How can there be an imminent threat of extinction of the US North Cascades grizzly population when it's already gone? The DEIS provides no information to suggest that introducing grizzlies into the North Cascades is timely.

Consequently, the rationale for dismissing alternatives from detailed analysis on Pages 35 to 38 is flawed. Some of these alternatives (Natural Recovery, Delayed Implementation of Washington Only) are dismissed from detailed analysis because they aren't timely enough. The DEIS dismisses these alternatives because they won't occur "in sufficient time to avoid the permanent loss of grizzly bears that are present in the NCE." How can an alternative be dismissed from analysis because it isn't timely enough in avoiding permanent loss of a population when the population no

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Under alternative B, there could be some adverse impacts on residents longer exists? The argument for timeliness was muted long ago, and a 20-year old recovery plan calling for action does not make a case for action right now.

### Issues

The public scoping process compiled an array of issues from the local community as shown in the public scoping summary. The current DEIS condenses complex concerns into two issues “Public and Employee Safety” and “Socioeconomics”.

The public and employee safety issue is misleading because it gives as much weight to concerns by employees during short-duration handling of

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Under alternative B, there could be some adverse impacts on residents grizzly bears as it does to concerns by community members for their safety when released grizzly bears are encountered in their neighborhoods over time, both within and outside of the release areas. Employee safety and public safety are nowhere close to the same issue.

The socioeconomic issue is presented in narrative form in terms of beneficial and adverse. No numbers, quantified dollar values, or site-specific information are used to quantify effects of the alternatives with respect to the issues.

Several issues could have been developed related to how local communities continue to operate when 200 grizzly bears are released in the neighborhood, but those issues are ignored or dismissed. In Chapter 1 on Page 13, local communities are rejected out-of-hand with the unverified assumption that grizzly bears will stay where they are released.

*It was determined that while a small number of communities adjacent to the recovery zone boundary may qualify as minority and/or low-income populations, these communities would not be disproportionately affected by*

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Under alternative B, there could be some adverse impacts on residents *grizzly bear restoration because restoration activities would not be focused in these areas. Therefore, this topic was dismissed from further analysis.*

If ever there was a time for analyzing effects on minority and low-income populations, this is the time. The DEIS dismisses the idea that low-income populations will be affected by grizzly bears by ignoring the possibility that bears might emigrate from release sites into neighboring communities.

### Alternatives

The range of alternatives is narrow and does not respond to the issues. The only difference among alternatives is the pace of grizzly bear introduction and the degree of monitoring. These alternatives do not respond to public safety or socioeconomic issues.

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Under alternative B, there could be some adverse impacts on residents Common to all action alternatives is some oddly phrased reference to 10(j) population designation. There is no assurance that the designation will be pursued or if pursued, that the designation will be approved. The reader is left to believe that protections for landowners from grizzly bear damage might be available, but don't count on it. How does the reader interpret what will happen over time with these alternatives when processes are still pending? Alternative B makes a vague commitment to monitoring bear activity before releasing more bears, but there is no defined means for local communities to give feedback to that monitoring.

### Affected Environment

Descriptions of grizzly bear behavior in Chapter 3 were incomplete, leaving the reader with many unanswered questions. Do grizzly bears emigrate to other areas after they are released, and if so, how far? Do grizzly bears accustomed to one diet learn to eat other food when made available?



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The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents Page 48 presents information on grizzly bear diet,

*A grizzly bear's diet consists of about 90% vegetable and insect matter; however, they scavenge and occasionally prey on ungulates in addition to ground-dwelling rodents that they actively dig out of dens or burrows.*

This information is discounted by the DEIS on Page 45,

*. . . researchers found that adult male grizzly bears were more carnivorous than any other age or sex class, with diets composed of around 70% meat (Jacoby et al. 1999).*

On Page 32, the DEIS shows that Alternatives B and C could release up to 40 percent male grizzlies, and Alternative D would not constrain male grizzly release. The 90 percent vegetarian diet estimate is not supported by your own data.

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Under alternative B, there could be some adverse impacts on residents

The entire topic of emigration is unaddressed. On Page 47, the DEIS hints at the fact that grizzlies will emigrate to other areas,

*Transient males, particularly subadults, are occasionally sighted in unoccupied areas.*

Why is there no robust discussion of emigration or dispersal? There is only a reference to a 10-mile radius for home range, which is a much different subject than emigration, particularly for adult males. The DEIS suggests that emigration is occurring in other populations where it references on Page 7

*The last verified grizzly bear in the BE was in 2007, when a black bear hunter mistakenly shot a young male grizzly bear. Through DNA analysis, the grizzly bear was documented to be from the SE (Servheen pers. comm. 2015).*

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Under alternative B, there could be some adverse impacts on residents

The Selkirk Ecosystem and the Bitterroot Ecosystem are separated by approximately 300 air miles, and a grizzly or its predecessors is documented through DNA analysis to have travelled from one area to the other. This is important information to disclose for communities adjacent to and well outside of the North Cascades area. The DEIS fails to provide any specific discussion about grizzly bear emigration.

Irrespective of the number of bears released, if the reintroduction is successful they will reproduce and the population will grow. National Park Service report on Yellowstone Grizzly's (<https://www.nps.gov/yell/learn/demographic-changes-in-yellowstones-grizzly-bear-population.htm>) states: For the period 1983–2001, Schwartz et al. (2006) observed a robust rate of annual population growth of 4.2-7.6%. However, our analysis of the 2002–2011 data indicated this annual growth had slowed to about 0.3-2.2% (Interagency Grizzly Bear Study Team [IGBST] 2012). A different reference suggested that "Grizzly bears have one of the lowest reproductive rates of all terrestrial mammals in North America" but did not give an estimate. Whatever the rate - if the habitat is suitable, and mortality factors are controlled - the population will grow which will increase

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The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents conflicts, damage and costs. It will also lead to more dispersal and therefore other communities not analyzed will be impacted.

The discussion of Gateway Communities on Page 70 is a head-scratcher. To discount the orchard, livestock, and other agricultural industries in Wenatche and Omak as historic industries that “have shifted their focus to tourism related activities” shows some strong ignorance about the area. Has the person who prepared this analysis ever visited these communities?

### Environmental Effects

In general the effects analysis is lacking site-specific information, and the discussion of indirect effects (occurring at another place or time) is neglected.

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The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents. Note that the Socioeconomic analysis (Page 153) does not bother to quantify effects in terms of dollars but instead speaks of losses as being limited to hours to days.

*. . . although individual landowners could experience impacts. However, these impacts would be limited in duration (hours to days), as the agencies implement actions to recapture or remove the grizzly bear causing damage. Impacts associated with capture or removal actions would be minimal because they would be limited to trapping events and would not affect socioeconomic conditions. In addition, under existing ESA 4(d) rules, landowners could be permitted to mitigate or eliminate grizzly bear impacts or damage and compensation could be provided as currently allowed under state law in Washington, if funding is available.*

If a rancher's calf crop or an orchard is marauded by a wandering grizzly, the DEIS asserts that it's a limited loss because the USFWS might arrive within hours or days to remove the offender, and the owner might even be compensated if they meet all of the criteria (but only if funding is available). Marauding might occur over a few hours or days, but the economic effect would be felt by a producer for much longer. There's also the likelihood that the losses could recur every year.

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Under alternative B, there could be some adverse impacts on residents

A particularly broad statement on Page 150 is that local communities can take heart that increases in tourism from grizzly viewers could offset adverse socioeconomic effects. The DEIS presents no information to support its repeated conclusion that grizzly viewing tourism is the panacea to local community economic concerns.

On Page 147, a set of assumptions about effects on livestock grazing are so unsupported, that we have to quote the entire section to highlight the absence of any meaningful analysis

*It is unlikely that grazing leaseholders would be affected by release of grizzly bears in the NCE under alternative B because the number of grizzly bears released and monitored would be small. In the unexpected event that impacts occur, they would likely be intermittent. Impacts per grizzly bear are also likely to be much less than in the GYE because grizzly bears relocated under this alternative would be less carnivorous than grizzly bears in the GYE based on their feeding habits in source areas; therefore, any depredation is expected to occur at a much lower rate than grizzly bears in the GYE.*

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Under alternative B, there could be some adverse impacts on residents

*Any impacts on grazing leaseholders' operations could potentially result in reduced employment in cattle ranching in the NCE area or increased costs of operating cattle ranching operations within the NCE. However, this is unlikely because ranchers could be compensated for cattle and sheep killed as the result of a grizzly bear depredation, if funds are available. Additionally, these impacts are somewhat less likely to occur given that most grazing lands are located primarily within an area of lower quality grizzly bear habitat. Figure 14 shows current, active grazing leases within the NCE. The closest grazing lease is located approximately 10 miles from a potential grizzly bear release area.*

How could those paragraphs be considered credible? Alternative B would eventually realize 200 grizzlies. That is not a small number. How can the impacts be considered small and intermittent? To an individual operator, losing calves could be a large and ongoing loss as could an orchard raided by grizzlies. The idea that grizzlies in the North Cascades would eat less livestock than in the Greater Yellowstone area is not substantiated with any information. Livestock losses are dismissed since livestock operators may be eligible for compensation (if funds are available). The section closes with a reference that grizzlies would be released 10 miles from an active grazing allotment. Considering the 300-mile trek the grizzly made from the

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The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents Selkirks to the Bitterroot, the 10-mile trip from the release site to an active grazing allotment appears very likely.

Here are some factors that would have added credibility to the socioeconomic analysis.

- Compensation programs as currently practiced are rife with problems. There is debate on the protocols to use to establish a firm finding of depredation by one particular species. There can be significant time delays in identifying a loss, and then in responding to the loss with an investigation - all of this reduces the probability of clean determination on depredation as the site is contaminated by other scavengers. Appropriations for compensation programs are continually subject to political processes, shifting budget priorities, and economic cycles. As such there is rarely sufficient funding to fully compensate for losses.



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The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents

- There would be additional costs that livestock producers, and landowners would carry to protect themselves from losses. This would include simple things like investing in bear-proof trash systems, and bear-proof home doors - to more significant things like range riding, as well as monitoring and communication systems, all of which add costs to operations, and stress on the operators and families.
- More broadly, the impact on land and home values from grizzly bear introduction should be analyzed. Some people may like seeing grizzly's from a distance, but most people probably don't want to live with grizzlies. And while they build a lot of assumptions about suitable grizzly habitat, and suggest that grizzly's would stay away from more developed areas - the grizzly's in Montana are happy to come down into small towns in Western Montana - particularly when winter food crops / prey are scarce, and these food sources experience significant variation year to year.
- At some level, there has to be a saturation rate for grizzly bear tourism too - and some differentiation. If grizzly's become more and

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The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents more prevalent across the Northern PNW the tourism draw to any one place would decline, and tourists would be looking for the "best" place to see grizzly's. This is not an unlimited growth industry.

- The presence of grizzly's could also be a negative factor for some tourism - not everyone wants to walk in the woods / mountains and run the risk of a grizzly encounter - these people would probably choose other / safer places to visit.

We take particular exception with the DEIS's treatment of anticipated effects on listed salmonids. From Page 108,

*While it is possible that grizzly bears, as opportunistic omnivores, could use fish as a food source, fish are not expected to be a primary food source and the number of grizzly bears present in the ecosystem would not be*

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The following comments are written in response to the Draft Grizzly Bear Restoration Plan EIS North Cascades Ecosystem and in support of Alternative A, the no action alternative.

Under alternative B, there could be some adverse impacts on residents *sufficient to create any pressure on fish populations as a result of predation.*

Appendix B then lists a determination of May Affect, Not Likely to Adversely Affect for species such as Chinook salmon, chum salmon, steelhead, and bull trout . Since grizzly bears have a reputation for raiding human garbage cans and congregating near dump sites, how are we to believe that salmon in area streams would not become a food source? With ESA listed salmon species in the area, loss of even a small number of salmon could be important to the population's survival.

Our work in implementing our Wallowa County Salmon Habitat Recovery Plan gives us pride in results we've achieved to maintain and restore salmon habitat in Wallowa County. We recognize the large amount of taxpayer and landowner resources invested in recovering listed salmon. Why is the grizzly bear plan exempt from the level of analysis normally assigned to projects that may affect salmon? These are potential direct effects on listed fish, which may require issuance of a take permit. Why is there no mention of consultation with NOAA – Fisheries in the DEIS, other than a statement that it needs to happen? How can a predator of a listed fish species get introduced into an area without consideration of effects on

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Under alternative B, there could be some adverse impacts on residents the listed fish? Are we spending millions of taxpayer dollars in recovering listed salmon only to spend millions in taxpayer dollars to introduce grizzly bears that will depredate the fish?

Page 22 of the DEIS attempts to discount effects on salmon by describing how grizzly bears will be selected for introduction into the North Cascades,

*In addition to a healthy population, source areas must be ecologically similar to the North Cascades (i.e., there should be a high likelihood that candidate bears do not rely on salmon for a significant portion of their diet, and that candidate bears do not have a history of conflict with humans).*

Simply put, the DEIS fails to adequately address effects on listed fish species.

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Connected Actions and Cumulative Effects

The list of actions tabulated in Table 8 on Page 86 does not provide the full range of actions and activities that contribute to cumulative effects.

This DEIS is the implementing decision for the 1997 U.S. Fish and Wildlife Service Grizzly Bear Recovery Plan North Cascades Ecosystem Chapter. On Page 16, the DEIS states that the plan includes steps for

*. . . reducing human-related direct and indirect mortality, improved sanitation, poaching control, access management, etc.*

It continues on Page 26,

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*Other access restrictions may occur under other implementation decisions by the agencies, which would be unrelated to the alternatives considered in this draft plan/EIS.*

However, earlier in paragraph it says

*No long-term closures or modifications to public access would be implemented.*

This tells us is that the decision for the grizzly bear plan will set in motion other agency actions which will have additional effects on the local community. Why aren't the effects of access restrictions addressed in this DEIS? Although access management falls under the prevue of another agency, the effects of these connected actions must be analyzed in this DEIS. This is not a proper use of the NEPA process, and it metes out decisions among other agencies so the reader cannot parse them out.

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Under alternative B, there could be some adverse impacts on residents. The cumulative effects analysis fails to recognize that ranchers are already seeing effects of depredation because of USFWS gray wolf management strategies. That might be a cumulative effect worth looking at, but instead, the DEIS prefers to stick with its wrote list of activities such as Ski Area Expansion Projects and Ongoing Road Maintenance. A conversation with local community members might have revealed the actions contributing to cumulative socioeconomic effects.

### List of Preparers

Chapter 5 shows no preparers with expertise on economic analysis or social effects. This interdisciplinary team does not appear to have the credentials to prepare an adequate analysis on local community issues.

### Summary

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Under alternative B, there could be some adverse impacts on residents

The DEIS is riddled with conflicting information about grizzly bears in the North Cascades. Its now-you-see-them-now-you-don't presentation about existing grizzly populations misleads the reader. You imply that the bears will stay within a 10-mile radius of where they are released, yet you sometimes admit bears will wander outside of the North Cascades area without any attempts to quantify the extent of potential emigration. Grizzly bears are assumed not to like fish. All of this is couched in language that immediate action is needed to implement a plan that sat on your shelves for 20 years.

The alternatives address none of the issues raised by the local community other than to lure them into the plan through the go-slow approach of Alternative B, even though all action alternatives would result in the same 200-bear population.

The socioeconomic analysis takes a cavalier tone with you-win-some-you-lose-some conclusion for the rancher or agriculture producer. It misleads the reader about Alternative B, claiming it brings the grizzlies in such a slow



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Under alternative B, there could be some adverse impacts on residents trickle, local communities won't notice the losses. Alternative B would eventually have the same effects as the other alternatives.

The concerns brought forward by local communities were ignored, generalized, and discounted as mere obstructions to the goal of grizzly bear introduction. The interdisciplinary team does not have the expertise to analyze effects on the social environment. We hope some of the \$550,000 is left to hire a qualified social scientist that might be able to prepare a professional and credible analysis of effects on local communities.

The triteness of the DEIS response to local community concerns could have been avoided through a collaborative approach with local government officials and landowners. Instead, the DEIS authors prefer to develop their documents and rush to the finish with a short public comment period.

You spent your money on a low quality DEIS. If this DEIS represents how taxpayer money is spent by the NPS and USFWS, we are suspicious of how you would spend taxpayer money implementing the grizzly bear plan.

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Please add our name and address to receive any future correspondence  
regarding the fate of this DEIS.