



## WILDERNESS WATCH

*Keeping Wilderness Wild*

### Board of Directors

Louise Lasley, NM  
President

Mark Peterson, WI  
Vice President

Gary Macfarlane, ID  
Secretary

René Voss, CA  
Treasurer

Talasi Brooks, ID

Tracy Davids, NC

Mark Pearson, CO

Cyndi Tuell, AZ

Howie Wolke, MT

Executive Director  
George Nickas

Minnesota Office  
2833 43rd Ave. South  
Minneapolis, MN  
55406

Idaho Office  
P.O. Box 9765  
Moscow, ID 83843

December 14, 2022

Superintendent  
North Cascades National Park Complex  
810 State Route 20  
Sedro-Woolley, WA 98284

Sent via: <https://parkplanning.nps.gov/commentForm.cfm?documentID=124399>

Dear Superintendent and Grizzly Recovery Planning Team:

Wilderness Watch is providing these comments on the November 2022 scoping letter and newsletter for the North Cascades Ecosystem Grizzly Bear Restoration Plan for North Cascades National Park and surrounding wildlands. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. Our organization is particularly concerned how this project may impact the Stephen Mather Wilderness in North Cascades National Park, and the surrounding Wildernesses on National Forest land.

The grizzly was an important ecological component of the Cascades. Where human actions have eliminated an indigenous species like the grizzly, where habitat conditions are suitable, and where the population will be self-sustaining, Wilderness Watch supports recovery of extirpated species. Natural recolonization is preferred to overt augmentation in Wilderness. Wilderness Watch strongly supports grizzly bear recovery in the North Cascades provided it can be accomplished in a manner that is both respectful of and protects the area's wilderness character, and does not result in the unnecessary deaths or harassment of grizzly bears.

We have several questions with the proposal and also some suggestions for alternatives. They are addressed in the following paragraphs.

### **Scope of the Proposal**

Habitat and connectivity are major issues. It is acknowledged that long-term survival of grizzlies in the lower 48 states can't occur without connectivity to other populations. For example, the Salmon-Selway-Bitterroot, Greater Yellowstone, and Northern Continental Divide Ecosystems are all as large or larger than the North Cascades, especially if one includes all the public land, largely roadless, in those areas that should be considered

(NOTE: The recovery areas are inconsistently drawn, based upon political rather than biological boundaries. As such, the North Cascades recovery area includes developed areas like the Stevens Pass Ski Resort and the town of Darrington while, for example, the Bitterroot Ecosystem excludes the Gospel Hump Wilderness and other large roadless areas of national forests). Even those areas with larger grizzly populations--Greater Yellowstone and Northern Continental Divide—must have connectivity for long-term survival. None are large enough on their own. Because of this, neither the NCDE nor the GYE populations have recovered and been de-listed from the Endangered Species Act. Additionally, none of the recovery areas in the US is as close to such a large human population as is the North Cascades.

As such, the fate of North Cascades population is based upon habitat protections, connectivity, and grizzly protection in British Columbia. The fact that bears are not being detected now in the North Cascades, but were apparently expanding their range in the past couple of decades, suggests that their populations are in trouble in Canada. The Draft EIS needs to determine whether there are regulatory mechanisms in place in both Canada and the US that would allow recovery and if not, then augmentation should not be pursued until adequate regulatory protections are in place. Second, the Draft EIS should address whether there is connectivity to other populations in Canada as no other US population or recovery area is close enough to be considered connected.

Regarding augmentation, the scoping information indicates that the population in the area is “functionally extirpated” from the ecosystem. While the information indicates grizzlies have been confirmed in recent years, there have been no bears killed recently, which is usually (and unfortunately) the standard for absolute proof. However, how will the placement of a few bears recover a population that is estimated at most at 50 bears (20 in the US and 25 to 30 in Canada)? In other words, how many different augmentations and over what period of time will be necessary to recover the populations? It certainly seems that a one-time augmentation is not being proposed, but rather a process of constant augmentation over years if not decades. Any analysis needs to be clear about this issue and analyze all of the augmentations under any alternative that proposes such an effort.

It seems obvious that, given the grizzly bear’s low reproductive rate, any recovery, regardless of the method employed, will take several decades. Thus, why is augmentation currently deemed preferable to natural recovery when both methods will take a long time? Natural recovery may begin rather quickly, given the ability of grizzlies to travel long distances. The Fish and Wildlife Service recognizes that in the Bitterroot Ecosystem a bear, whose genetic background was from outside the ecosystem, was illegally killed in 2007 even though no evidence of bears had been seen for 60 years. A second grizzly was killed in the region in 2009, and in the past year a collared female grizzly has wandered into that same ecosystem and dened there. Since the Cascades supposedly have more bears (at least according to the USFWS website), it would appear that natural recovery is potentially viable. If bears are moving into the Bitterroot Ecosystem, they can certainly expand and move into the Cascades, provided there is connectivity.

For social and ecological reasons, natural recovery seems preferable. Bears that recover naturally in the area will be accustomed to the region. While the ecosystem has good habitat, it is also heavily used and adjacent to millions of people. Bears that are placed in this new environment would most likely be from areas with much less human use. These bears would more easily run into trouble because the opportunities for human contact would be much greater. Indeed, research shows that mortality of grizzlies is tied to two factors: the frequency and lethality of human contact.

Moreover, grizzlies that find their own way into the Cascades are likely to find more acceptance from those who oppose grizzly recovery, than if those bears are released by federal agencies. Experience with wolves in the Northern Rockies suggests wolves that were recolonizing the region were viewed much more favorably than the populations released by the government. While opposition to grizzly recovery by anti-grizzly factions is not a reason to forego augmentation or reintroduction, for the sake of the bears it seems it would be far better to promote natural recovery rather than translocating bears to the North Cascades.

Where would bears come from for any augmentation effort? The analysis needs to assess whether any population that would be somewhat site-adapted, therefore reasonably close by, is robust enough to allow bears to be removed. The Northern Continental Divide Ecosystem is not that robust, nor has that population been de-listed under the Endangered Species Act.

Furthermore, bears that are captured, handled, and collared tend to have greater conflicts with humans than bears which are left alone. Would any augmentation require extensive monitoring and recapture of bears? If so, it may doom the augmentation to failure. New research from earlier this year also indicates that translocated bears tend to not stay in the places where agencies plant them more often than resident bears. (See Stenhouse, G.B., Larsen, T.A., McClelland, C.J.R., Wilson, A.E., Graham, K., Wismer, D., Frame, P., and Phoebus, I., 2022, Grizzly bear response to translocation into a novel environment: *Wildlife Research*, v. 49, no. 2 (March 2022), DOI: [10.1071/WR21060](https://doi.org/10.1071/WR21060), accessed 12 December 2022.)

Another factor to consider is that an experimental, nonessential listing under section 10(j) of the ESA could easily fail as well. There is far more latitude to kill grizzlies under the experimental population designation than under full protection as threatened or endangered, which the population currently warrants. Natural recovery would not likely change the protective designation and regime currently in place. In fact, it would most likely improve upon it. Furthermore, the research cited above indicates that trans-located bears don't stay put as well as resident bears, one implication being that the trans-located bears would more likely be re-captured, tranquilized, or shot at higher rates than resident bears.

## **Wilderness**

Of significant concern is how augmentation would be carried out in designated Wilderness, if it does take place at all. As noted earlier, it would seem that natural recovery is a better option for the long-term well-being of the bears as well as for Wilderness. The use of helicopters, trucks, or other mechanized equipment is incompatible with Wilderness. Options for restoring populations of grizzlies should include measures that are compatible with and respectful of the region's wilderness character including non-motorized and non-mechanized translocation and monitoring of the animals. Further, even radio collars trammel the wildlife and therefore the Wilderness itself.

Wilderness is as much a process as place. It is "untrammelled by man" (wild or unmanipulated or unconfined) with "primeval character and influence." These relate directly to a process that is devoid of human intent to manage habitat or wildlife. Any transplanting of grizzlies in Wilderness must be done in a manner compatible with Wilderness. However, if grizzlies are present in the Wilderness or if it is likely they will expand into the Wilderness, then it should not be necessary to augment them. The following section on alternatives gives some possible options to consider.

## Alternatives

The preferred alternative should be that of natural recolonization or recovery. This is NOT the same as a No Action alternative. Working with British Columbia to stop the hunting of grizzly bears in all of the bear units north of the border seems the best way to assure recovery. The US federal agencies should also look at corridors and connectivity, and work with BC agencies to protect corridors and connectivity so that bears can more easily travel across the international border without getting killed.

Also, any hunting methods for black bears need to be evaluated. It may be that black bear hunting should not occur for some time in the recovery area in order to prevent accidental deaths of grizzlies. Other protective measures may need to be instituted including seasonal closures to human use of areas where grizzlies may congregate during crucial times.

Precise information on where the augmentation and relocations may occur is lacking. However, it may be best for managers and grizzlies for any reintroduction to be done outside of Wilderness, if it is done at all. Given the perceived access needs of the agencies involved, it may be less stressful for the grizzlies to be released after a shorter trip than a longer one that would presumably occur in Wilderness.

In addition, all alternatives should include non-mechanized methods for releasing, monitoring, or otherwise “managing” grizzlies within Wilderness in the North Cascades.

## Summary

Our specific recommendations follow:

- **Do not capture and relocate grizzlies from the Northern Continental Divide Ecosystem (NCDE).** The federal agencies plan to kidnap bears from either British Columbia or the Northern Continental Divide Ecosystem (NCDE) around Glacier National Park to move to the North Cascades. But grizzlies have still not recovered in the NCDE and there are no “extra” bears there to move to Washington. Such a plan would weaken the NCDE grizzly population and diminish the likelihood of developing the needed population linkages between the NCDE grizzlies and those elsewhere, such as in the Greater Yellowstone Ecosystem, which are needed before the grizzly can be considered recovered and removed from the ESA..
- **Do NOT use an “experimental population” 10(j) designation.** We oppose an “experimental population” designation. The agencies must create and analyze an alternative that does not rely on the so-called “experimental” population designation of section 10(j) of the Endangered Species Act (ESA). Under such a designation, individual bears from the NCDE which are currently protected under the ESA would be taken from their home range and transported to Washington state, where they would lose their current protections under the ESA. It appears that the agencies are projecting a 36% mortality rate for translocated bears. Such a high rate is completely unacceptable, and much higher than if the bears were left alone in their home territories. An “experimental population” designation is also almost a guarantee that the federal agencies will NOT identify and protect corridors and connectivity.
- **The NPS/FWS must develop and analyze a natural recovery alternative.** This is NOT the same as

the No Action alternative. Under a natural recovery alternatives, the agencies would actively work with agencies in British Columbia to ensure that grizzlies are protected on both sides of the border. Under this alternative, the agencies would also identify and protect corridors and connectivity so that bears could move across the border with getting killed.

• **The NPS/FWS must develop an alternative that doesn't violate the Wilderness Act.** The agencies must not pursue alternatives that would violate the Wilderness Act and would entail heavy-handed, stressful management of bears. Should the NPS choose to augment the existing population by translocating bears, the agency should first consider limiting translocation to sites outside of Wilderness. There are ample sites, on both sides of the Cascade crest, where roads have been built right next to designated Wildernesses and National Park land where translocation could occur without violating the Wilderness Act. If the NPS/FWS decide to translocate within Wilderness, the agencies must comply with the Wilderness Act: no helicopters, no motor vehicles, no motorized equipment, and no invasive monitoring.

Wilderness Watch urges the agencies involved to take all measures necessary to promote the natural recovery of grizzlies to the North Cascades Ecosystem. We urge you to encourage the government of British Columbia to take all necessary measures to protect grizzlies in the ecosystem on the Canada side of the border. Only after measures are in place to protect existing populations of grizzlies, and those measures are shown to be inadequate to allow the natural recovery of grizzlies in the area should augmentation be considered.

Grizzlies were (and hopefully will be in the future) an important part of the wild Cascades. However, the EIS needs to make the case that augmentation is truly needed and that it will have some measure of success. It needs to fully evaluate the alternatives, duration and likelihood of success. Given the low reproductive rates, it seems that natural recovery would be best both socially and biologically for recovery in the long term.

Please keep us updated on this proposal.

Sincerely,



Kevin Proescholdt  
Conservation Director