



## WILDERNESS WATCH

*Keeping Wilderness Wild*

### Board of Directors

Mark Peterson, WI  
President

Tracy Davids, NC  
Vice President/Secretary

René Voss, CA  
Treasurer

Mike Browning, CO

Jon Dettmann, MN

Mark Pearson, CO

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  
Mike Browning, CO

November 13, 2023

Office of the Superintendent  
North Cascades National Park Complex  
Grizzly Restoration EIS  
810 State Route 20  
Sedro-Woolley, WA 98284

Sent via: <https://parkplanning.nps.gov/commentForm.cfm?documentID=132104>

Dear North Cascades National Park Complex Grizzly Recovery Planning Team:

Wilderness Watch is providing these comments on the Draft Grizzly Bear Restoration Plan-Environmental Impact Statement North Cascades Ecosystem (DEIS). Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. 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. As such, we feel there are major changes needed to the proposal and DEIS in order for it to accomplish these goals. We also oppose the issuance of a 10(j) rule because it will likely result in the additional loss of grizzly bears and greater deterioration of the Wildernesses in the Cascades, Northern Continental Divide, and Greater Yellowstone Ecosystems.

Attached to this comment is the comment on the 10(j) Rule. While the National Park Service (NPS) may choose to ignore the comments on the 10(j) rule, these two issues are integrally linked.

On occasion, we quote from our past comments and submissions to summarize key points rather than repeat them verbatim in their entirety because you already have those comments and they are part of the record. Also, most of the points made in those past comments are still relevant as the errors in this DEIS remain. Thus, we

incorporate by this reference our past comments and submissions for the various iterations of grizzly recovery proposals in the NCE that have been undertaken.

### **Introduction**

A few key points, summarized or alluded to from past comments that are applicable to the current DEIS, are listed below. It is not an all-inclusive list:

- The use of helicopters, trucks, or other mechanized equipment is incompatible with Wilderness. The DEIS proposes a decades-long assault of motorization, grizzly augmentation, and invasive monitoring in Wilderness that are clearly not the minimum necessary. We go into more detail later in this comment.
- The failure to even analyze a pro-active natural recovery alternative biases the DEIS. Further, the real reason for rejection of this alternative is political, rather than scientific, as proven by comments recently made by the North Cascades National Park Complex Supervisor. We go into more detail later in this comment on this issue.
- Connectivity is a major issue. Population ecologists recognize that long-term survival of grizzlies in the lower 48 states can't occur without connectivity to other populations. As such, the fate of any US North Cascades population would be based upon habitat protections, connectivity, and grizzly protection in British Columbia.
- Given the grizzly bear's low reproductive rate, any recovery, regardless of the method employed (augmentation or natural recovery), will take several decades. Augmentation risks the loss of bears from elsewhere, who are placed in unfamiliar surroundings further delaying connectivity and recovery of other populations. Natural recovery does not pose that risk.
- For social and ecological reasons, natural recovery is preferable. Grizzlies that find their own way into the Cascades are likely to find more human acceptance and will be better equipped to deal with humans, than if those bears are released by federal agencies. While the NCE has good habitat, it is also heavily used and adjacent to millions of people.
- Bears from the Northern Continental Divide Ecosystem (NCDE) and Greater Yellowstone Ecosystem (GYE) are not recovered. Removal of grizzlies in those places would prevent recovery of a connected population in the US Northern Rockies including bears which are currently recolonizing the Bitterroot Ecosystem (BE).

The tenor of the DEIS strikes a discordant note as it frequently refers to the national park units and the national forests as NPS and USFS lands. For example, see DEIS at 12. These are not lands owned by either agency, but the American public as a whole. This erroneous sense of proprietary rights reveals an

ugly truth about how the agency views its appropriate role and public service.

## Wilderness

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, if that option is selected. 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. In this case, 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.

Our past comments address the essence and requirements of the Wilderness Act.<sup>1</sup> They are part of the record. When it comes to the statutory requirements of the Wilderness Act, the DEIS is inadequate. We focus on three of these inadequacies in the section that follows:

- The DEIS does not mention the Wilderness Act in the section on statutory direction for grizzly recovery beginning on page 18.
- The DEIS fails to show that translocating bears is the minimum necessary for preservation of the Wilderness, as required by the 1964 Wilderness Act. Similarly, it fails to show that translocating grizzly bears via helicopter into Wilderness and the associated heavy-handed management of collaring, monitoring, and return helicopter intrusions, is the minimum necessary.
- The DEIS downplays the impacts of the heavy-handed action alternatives on Wilderness. Our past comments detailed the problem of the MRA/MRDG process. The dissection of the wilderness attributes via the fatally flawed MRA/MRDG process, which is employed as the protocol for analyzing impacts to Wilderness in this DEIS, downplays the impacts to Wilderness and fails to recognize the essence of Wilderness.<sup>2</sup>

---

1 See our March 24, 2015 scoping comments, our March 15, 2017 DEIS comments, our October 24, 2019 DEIS supplemental comments, our December 14, 2022 scoping comments, and our February 21, 2023 supplemental scoping comments.

2 Wilderness professionals (Cole et al. 2015, already provided to you in past comments) put it well, arguing against this fragmentation:

---

The omission of the Wilderness Act as statutory direction sadly reflects the disregard the NPS shows toward Wilderness. The routine use of helicopters as packstock for trail work and other activities is emblematic of this problem (see DEIS page 96). It seems the agencies view Wilderness as a hurdle to overcome rather than the wild place it is; the domain of creatures like the grizzly.

The DEIS fails to show that translocating bears or the extensive use of helicopters and collaring is the minimum necessary for preservation of the Wilderness. Regarding the translocation of bears and the minimum necessary we wrote in our past DEIS comments (footnote omitted):

The DEIS does not make the case that translocation of bears in Wilderness is necessary. Natural recovery was not analyzed in the DEIS, and thus underlying factors limiting natural recovery were not adequately disclosed and analyzed. If habitat limitations, human-related conflicts, connectivity limitations, or other factors are limiting natural dispersal and recovery, the agencies must explain why those underlying factors cannot be addressed to encourage natural recovery, or alternatively, why those underlying factors will not similarly limit translocation success. In other words, natural recovery would need to be fully considered before translocation could be determined necessary and viable. Additionally, the DEIS inadequately addresses the issue of translocation outside of Wilderness. We address these issues in more detail under the Alternatives section.

Assuming translocation is necessary, the DEIS does not make the case that helicopter use, especially at the levels proposed in the action alternatives, is the

---

We disagree. The purpose of the mandate to protect wilderness character above all else is to focus the attention of wilderness stewards on preserving the “essence” of wilderness— those qualities that are most unique and distinctive about wilderness and make it “a contrast with those areas where man and his own works dominate the landscape”. It is about differentiating the most important things to protect from the many other things that ideally might be protected in wilderness. For this purpose, wilderness character must be defined as a coherent whole, in a manner that is not internally contradictory. It cannot be broken down into separate qualities.

We believe that wilderness character is fundamentally about wildness and that it should be defined as the degree to which wilderness is free from deliberate human modification, control, and manipulation of a character and scope that hampers the free play of natural ecological processes.

minimum necessary. Also, the ongoing collaring and recapture of bears (which is only mentioned and not analyzed in the DEIS) is not shown to be the minimum necessary. Noninvasive monitoring techniques, for example, are not considered and risk factors associated with capturing, collaring, and active transmittal of telemetry data are not disclosed and analyzed.

Looking first at natural recovery, or at least migration from Canada to the US, a news report quoting the superintendent is revelatory.<sup>3</sup> An article from the *Skagit Valley Herald* on February 12, 2023, entitled *National park superintendent talks about challenges facing North Cascades*, states:

Since his arrival at the park in late 2021, Striker's thought has been that if Canada does relocate grizzly bears and if they end up establishing a population in North Cascades National Park, then managing them as an experimental population is no longer an option.

"... We are going to be stuck with the normal fish and wildlife rules that say you pretty much can't do anything," he said.

Striker believes the best approach is to get an experimental population in place before the bears arrive on their own.

So much for the claim in the DEIS that grizzly bears won't make it down to the US North Cascades, the basis for rejecting analysis of a natural recovery alternative. The superintendent apparently believes natural recovery will happen and he wants to prevent grizzlies that do come from Canada from full protection under the ESA! Hence, the rush to bombard the Wilderness with helicopters to bring grizzlies taken from other places under an experimental, nonessential population designation. We expect better from our public servants. In sum, the DEIS dissembles the public regarding the possibility of natural recovery even though natural recovery as it relates to the US North Cascades is apparently viable. Therefore, it would be the minimum necessary to protect Wilderness.

If translocating bears were the minimum necessary, and we greatly doubt it because of indications to the contrary as explained in the preceding paragraph, then the next step would be to do it in a way that is the minimum necessary to protect Wilderness. The DEIS states grizzlies will be trapped (supposedly most of the capture would occur outside of Wilderness, though page 108 of the DEIS suggests it could occur inside) and transported in trucks to a staging area. The protocol is to relocate grizzlies away from roads and trails. However, grizzlies are mobile and contact with humans is inevitable, especially in areas that see so much recreation use like the North Cascades. Rather than having all action alternatives confine grizzly placement in the NCE to helicopters (all) in Wilderness (with few or no exceptions), putting grizzlies in remote or relatively remote areas not in Wilderness is an option that should have been explored. Temporarily closing primitive roads for placing grizzlies is preferable. Using helicopters in

---

3 See our February 21, 2023 supplemental scoping comments.

non-Wilderness backcountry areas is not preferred because of the risks helicopter pose as evidenced by a recent accident at Copper Lake.<sup>4</sup>

Ironically, the agencies' reluctance to temporarily close areas to human use as expressed in the DEIS is belied by the fact the roadless Copper Lake area was recently closed to public use to recover a crashed helicopter (see the footnote above). This behavior sends a signal to the public that the agencies place little value on protecting Wilderness. These options discussed above are less intrusive to Wilderness and would be the minimum necessary if indeed translocating bears is required, yet are not considered by the agency.

Figure 11 (page 107) of the DEIS shows that a portion of the Western Pasayten potential release zone is in roadless country outside of Wilderness and near staging area G. Places like the South Fork Slate Creek and Boulder Creek are remote, trailless areas inside the release zone. The headwaters of the West Fork Methow River and its southern tributaries and the South Fork Trout Creek are trailless areas bordering the release zone. Even better is using the road over Hart's Pass rather than accessing this region via helicopter. The flat near the mouth of Sliver Creek west of Ross lake is in non-wilderness and trailless area bordering the North Unit Park zone and close to staging area A (DEIS Figure 11), but it would require helicopter or boat access.

Other areas where bears might be placed would include Sibley Creek northwest of Cascade Pass Trailhead via the Sibley Creek 1540 route or helicopter in the upper reaches. The non-wilderness portion of Alma Creek, Rhodes Creek (Thunder Creek area) out of the Wilderness, the far reaches of the Baker Lake Road, and areas near Lucerne and Holden could be considered. This list is not exhaustive.

Further, page 92 of the DEIS states, "there is a corridor 100 feet wide, and 50 feet either side of the center of the Cascade and Stehekin River Roads, which is not part of the wilderness designation." These trailheads could be release sites. The Cascade Pass Trailhead is accessible by wheeled vehicle and could be temporarily closed; the Cottonwood Camp is temporarily unavailable to wheeled traffic and could be a release site—it is within the South Unit, Park and GPW (DEIS page 107)--though it would have an impact on the surrounding Wilderness as it would have to be accessed by helicopter. While it is not a preferred site, it is outside of Wilderness.

Even if none of the above suggestions for translocation areas outside of Wilderness prove adequate, the point is the agency has not done a thorough analysis of options outside of Wilderness. Only part of one translocation area is located out of Wilderness.

The Wilderness Act contains a "narrow" exception authorizing helicopter use only where necessary to "further the wilderness character of the area." *Wolf Recovery Found.*, 692 F. Supp. 2d 1264, 1267-68 (D. Id. 2010) (quotation omitted). This exception permits otherwise-prohibited activities only in the "most rare of circumstances" in which denying the activity would itself compromise the integrity of the

---

4 See <https://www.fs.usda.gov/alerts/mbs/alerts-notices/?aid=83649> .

Wilderness. *Id.* at 1268. Invoking this provision on such a broad scale (144 landings) would contravene the statutory language and its interpretation by the federal courts, and would permit the exception to swallow the rule that helicopter use is prohibited in Wilderness. *See id.* (“Helicopters carry ‘man and his works’ and so are antithetical to a wilderness experience. It would be a rare case where machinery as intrusive as a helicopter could pass the test of being ‘necessary to meet minimum requirements for the administration of the area.’”).

The only logical conclusion is the DEIS fails to show that either translocating bears or a motorized assault on the Wilderness is necessary to protect the Wilderness and recover grizzly bears. The indication by the superintendent that translocations just north of the border in Canada would lead to a natural recovery south of the border, something the agency wants to prevent, and the failure to consider areas outside of Wilderness for translocation are two fatal flaws in the DEIS.

The DEIS downplays the impacts of the heavy-handed action alternatives on Wilderness. Some background dissecting the Wilderness Act into competing parts is in order because this erroneous fragmentation of wilderness attributes is the basis for making the Wilderness Act a procedural rather than a substantive law, via the flawed MRA/MRDG process.

The DEIS at 91 cites to Landres et al. 2015. This flawed protocol is the subject of the Cole et al. 2015 critique which has already been provided to you. Aside from the fact it is not legal or logical there are three other problems with this approach illustrated in the bullet points below that relate directly to the Landres et al. **Reference.**

1. *The Origins and Consequences of Defining Wilderness Character through Fragmenting The Eloquent Whole of the Wilderness Act*

Landres and others identified their various attributes of wilderness character by dissecting the Wilderness Act. It was an exercise in reductionism. From our communications with Landres, the main purpose behind this exercise was to be able to objectively monitor changes in wilderness character in the National Wilderness Preservation System. Hence, the protocol cited in the DEIS, *Keeping it Wild 2*. While this process to define wilderness character was undoubtedly a well-intended effort, as time has passed, it is clear it has serious negative unintended consequences for Wilderness. Other wilderness specialists and researchers recognize these failings in their pointed critique (again, see Cole et al. 2015). A prime example of a negative consequence is the erroneous idea that managers could trade off various components of wilderness character against each other, thereby reducing the Wilderness Act into a procedural process via the MRA/MRDG process. This management mindset, which effectively repeals and rewrites the Wilderness Act, is a recent development. It is doubtful even those wilderness specialists who defined wilderness character in a reductionist manner would concur. That leads to the second point below.

2. *This bizarre dissection of the Wilderness Act conflates the essence of Wilderness, its character, with other attributes.*

Footnote 2 provides an introduction to this topic. Cole et al. 2015 continue on page 4:

The five-quality KIW2 definition confuses wilderness character with a list of all the things we value in wilderness and would like to protect and preserve. By making all wilderness values a part of wilderness character, and treating all those values as equal in importance, this definition negates the intended purpose and meaning of wilderness character. Most onerously, it undervalues the importance of protecting wildness. Wilderness character cannot be protected above other wilderness attributes and values if all attributes and values are included in the definition of wilderness character and wildness cannot be emphasized when it is just one of many values that managers might protect.

In recent years, our concerns about the inappropriate KIW2 definition of wilderness character have grown, as those who developed it have promoted its use—not just as a monitoring framework—but as the basis for wilderness stewardship (Landres et al. 2011). Without meaningful public involvement, the agencies charged with wilderness management have incorporated the five-quality definition into their stewardship policy and guidance and it has been incorporated into stewardship decision making processes such as the Minimum Requirements Decision Guide (Arthur Carhart National Wilderness Training Center n.d.). Wilderness stewardship decisions based on an inappropriate definition of wilderness character are likely to be inappropriate and ultimately will harm wilderness. Of particular concern is the internally contradictory nature of the KIW2 framework, which makes it acceptable to trade-off degradation of a quality such as “untrammelled” for improvement in another quality such as “natural.” This gives managers almost infinite discretion in deciding which values will be protected and which will be compromised to achieve their goals.

In this article, we provide a more appropriate definition of wilderness character and a rationale for why wilderness character should be defined this way, arguing that our definition is more consistent with the Wilderness Act and better for wilderness than the five-quality KIW2 definition. We address concerns that some have raised with our approach and conclude with specific recommendations for moving forward in a manner that meets many of the goals of KIW2, despite the need to develop a more appropriate definition of wilderness character.



In a program review initiated by the four federal agencies, including the NPS, and conducted by the Pinchot Institute for Conservation in 2001, the importance of untrammeled (or wildness) is emphasized. The purpose of the study was to examine the critical administrative or stewardship issues facing Wilderness. One of the eight “fundamental principles” for stewardship emphasized the need to preserve the wildness in Wilderness. As the Pinchot report stated, “Protection of the natural wild, where nature is not controlled, is critical in ensuring that a place is wilderness... Since wild is a fundamental characteristic of wilderness that is not attainable elsewhere, if there is a choice between emphasizing naturalness and wildness, stewards should err on the side of wildness.” This clear direction, developed at the behest of the agencies, precedes the flawed MRDG/MRA process and the monitoring protocol. Neither the MRDG/MRA process or the monitoring protocol have gone through rulemaking.

3. *The Monitoring Protocol Itself Does Not Offer Support for the Manipulation Proposed for the Wilderness in the North Cascades*

In *Keeping It Wild 2: An Updated Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System*, Landres et al. 2015. RMRS-GTR-340<sup>5</sup> has this to say about untrammeled:

To preserve the Untrammeled Quality of wilderness, managers need to exercise restraint when authorizing actions that manipulate any aspect of the wilderness—in general actions that trammel should be avoided as an essential principle of wilderness stewardship unless it can be shown that these actions are necessary to preserve wilderness character as a whole (Kaye 2014).

Landres et al. 2015 at 34. It is hard to conceive of trammeling actions that would be necessary for this purpose. The Strategy cited above and its associated *Monitoring Selected Conditions Related to Wilderness Character: A National Framework*. Landres, et al. 2005. RMRS-GTR-151 cite two of the Forest Service’s preeminent wilderness researchers in describing how the untrammeled quality of Wilderness affects management. Cole (2000) in Framework states that untrammeled “suggests more about the *process* of management than it does about the *outcomes* of management.” (Emphasis added). The Strategy paper states,

Lucas (1973, p. 151) stated, “If ecological processes operate essentially uncontrolled within the Wilderness frame of reference, the results, whatever they might be, are desirable by definition. The object is not to stop change, nor to recreate conditions as of some arbitrary historical date, nor to strive for favorable change in big game populations or in scenic vistas. The object is to let nature ‘roll the dice’ and accept the results with

---

5 Again we have serious concerns with this protocol, see attached critique (Cole et al. 2015). Nonetheless, it does recognize that trammeling negatively affects Wilderness.

interest and scientific curiosity.”

Landres et al. 2015 at 33. The action alternatives that affect the Stephen Mather, Pasayten, and Glacier Peak Wildernesses are not consistent with this guidance.

In other words, the fragmentation of the Wilderness Act into inconsistent and competing directives is the wrong approach. It misses the essence of Wilderness and violates the laws of statutory construct. Regardless, the monitoring protocol is not to be used as a decision-making tool as is being done in this case.

The DEIS admits on page 94 that the NPS “participates in a number of actions that may trammel wilderness in an effort to protect other qualities of wilderness character.” See also page 99 for Forest Service actions. As noted above, this approach is contrary to statutory construction and any reading of the Wilderness Act. The actions, supposedly on the part of natural<sup>6</sup>, always affect the wildness/untrammelled essence of Wilderness.

We really don't know how many helicopter flights and landings will be done or the time frame for this project. The DEIS suggests 144 (page 30) and 10 years, but other pages (compare 26 and 33) implies more helicopter flights could be used in the adaptive management phase, which will last from 60 to 100 years. Further, the DEIS's analysis that 144 helicopter landings and the trammeling actions are only temporary ignores the fact that a trammeling is permanent (see pages 104 to 110). Under the twisted rationale expressed in the DEIS (including the MRDG), it would be okay to allow motorized use in Wilderness to enhance the recreational public purpose of wilderness, say for two weeks every year, since it is only temporary. Downplaying the impacts as the DEIS does is like saying that a violent assault on a person has no lasting effects once the assault ends. In essence, the proposal is an administrative decision to de-designate Wilderness, at least for decades.

The MRDG (and elsewhere in the DEIS too) makes the same mistake we raised in our past comments. The following bullet points summarize those concerns:

- The draft MRDG determination of necessity is made in step one before weighing the various wilderness attributes, which occurs in step two. While untrammelled is the preeminent wilderness attribute, it is buried by the flawed MRDG protocol and reduced to a second-class status.
- The second step of the MRDG confuses the public purposes (**plural**) of Wilderness) in section 4(b) of the Wilderness Act with the singular **purpose** mentioned in section 4(c) of the Act (see page E-9). Prohibited uses in section 4(c) are only allowed if they are the minimum necessary for the singular purpose of the Act. If prohibited uses could be waived to facilitate, for example, recreational use, which is found in section 4(b), then motorized use and buildings could be constructed to enhance recreation.

---

6 The Wilderness Act uses the term natural conditions.

- The finding of necessity in the draft MRDG (and elsewhere in the DEIS too) is contradictory to agency actions elsewhere. If it is necessary to translocate bears in the NCE, why is it no longer necessary in the Bitterroot Ecosystem grizzly recovery area, where the decision to do was withdrawn? Removing bears from one threatened population to another could endanger both populations and would have a negative impact in both cases on Wilderness (see also DEIS on page 108, which only does a cursory analysis of impacts to removing grizzlies from Wilderness for translocation to the NCE).

The tradeoffs rating in the MRDG are in error. Page E-16 fails to include the ongoing trammeling of collaring grizzlies, which could entail more trammeling or motorized use in Wilderness. Only one item is counted as trammeling in the checklist. The features of other value turns the Wilderness Act on its head. It considers that use of helicopters beneficial to Wilderness. Such a conclusion is absurd. Even then, the MRDG rating system shows this action has more negative impacts

In sum, the Wilderness analysis in the DEIS (including the MRDG) is inconsistent with the Wilderness Act and NEPA. As shown above, it downplays the extensive damage to Wilderness from the proposal. It refuses to look at alternatives that recovery grizzlies and protect Wilderness. It ignores fully analyzing issues like vegetation removal in Wilderness for the sole purpose of landing sites (page 14) and soundscapes, which affect areas in and out of Wilderness (page 15). The DEIS needs to be drastically altered to include options that don't invade Wilderness and do an adequate analysis of impacts on Wilderness in the NCE and the US Northern Rockies.

### **Grizzly Bears**

In our past comments we noted:

The paucity of information about grizzlies in British Columbia in the DEIS is troubling because the purpose and need is premised on a conclusion that no natural recovery could ever take place. Even if that conclusion were accurate, and no connectivity is or would be available in the future, the number of bears that would occupy the NCE are too few for long-term viability (see Attachment K). Thus, the action alternatives that are studied would effectively condemn the translocated bears or their offspring to eventual extinction under that assumption.

In sum, the purpose and need is premised on a conundrum. The assumption that connectivity of grizzly populations in the NCE and elsewhere in BC is no longer possible, so translocation to the NCE is necessary. Yet, the NCE is not large enough for long-term viability of grizzly populations without connectivity. Without more information about the situation in BC, and without an alternative fully exploring natural recovery and efforts the agency may take to increase the success of natural recovery, it is impossible to gauge the need and ultimate effectiveness of more intrusive translocation efforts.

The DEIS promotes taking bears from the NCDE, GYE, and in British Columbia. It does not evaluate the impacts of taking bears from the two sub-populations in the US Northern Rockies, both listed as threatened. Will recovery be hampered by the removal of bears from those two sub-populations and in the Bitterroot Ecosystem, where bears are just now returning?<sup>7</sup> How does taking grizzlies out of their territories in Wilderness in the Northern Rockies affect those Wildernesses and others in the US Northern Rockies, such as the Selway-Bitterroot Wilderness where grizzlies are starting to recolonize?

The 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. In fact, the NCE recovery area has inclusions within it that are Management Zone 3, “that may be incompatible with grizzly presence” under the 10(j) rule (see DEIS pages 36 and 37).

Since there are no food storage orders currently for the Okanogan-Wenatchee National Forest, and the Mt. Baker-Snoqualmie National Forest just initiated such an order this year, it seems premature to consider releasing bears until a program is in place and operating for some time that deals with sanitation, food storage, and public education (DEIS page 25). The 10(j) rule and the lack of preparation for recovery or augmentation are serious threats to grizzlies and the Wilderness.

Page 7 of the DEIS shows a map of where grizzlies are located in various units in BC, but it does not do the same for the US. Having a better visual representation is important.

## Summary

As our earlier comments stated:

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 should be an important part of the wild Cascades. However, the DEIS fails to make the case that augmentation, especially with the proposed means that harm Wilderness, is truly needed or that it will have some measure of success. The grizzly bears and the Wilderness deserve nothing less than a

---

<sup>7</sup> The DEIS states on page 9 there are no bears in the Bitterroot Ecosystem, a finding rejected by a recent court case in the Federal District of Montana.

well-considered analysis, which this DEIS fails to accomplish.

Please keep us updated on this proposal.

Sincerely,



Kevin Proescholdt  
Conservation Director