

Full proposal and submission:

<https://parkplanning.nps.gov/projectHome.cfm?parkID=327&projectID=112008>

FAQs: <https://www.nps.gov/noca/upload/NCE-Griz-EIS-FAQs-20230928-508.pdf>

November 9, 2023

U.S Department of the Interior National Park Service and
U.S. Fish and Wildlife Service (via electronic submission)

Re: 2022 North Cascades Ecosystem Grizzly Bear Restoration Plan/Environmental Impact Statement

The Vital Ground Foundation strongly supports the agencies' alternatives B and C to actively restore a population of grizzly bears to their historical range in the North Cascades Ecosystem under the Endangered Species Act. Vital Ground supports designating this population as a 10(j) experimental population and alternatively supports restoring the NCE grizzly population without an experimental population designation and varying the number and frequency of proposed grizzly bear releases into the NCE to achieve the restoration goal in a shorter time period. Vital Ground does not support the agencies' no action alternative A.

The Vital Ground Foundation is America's only nationally accredited land trust dedicated to protecting and restoring North America's grizzly bear populations for future generations by conserving wildlife habitat and by supporting programs that prevent conflicts between bears and humans. Vital Ground accomplishes this by partnering with landowners through voluntary, incentive-based conservation projects to protect habitat, and by supporting community programs to prevent bear-related conflicts.

The NCE is one of two intact ecosystems within historical grizzly bear range that does not currently host a functional population of grizzly bears. Spanning more than 6 million acres, the NCE offers a singular and irreplaceable opportunity to return the grizzly as a vital link in the nation's wildlife heritage. Restoration of the species to the NCE will make significant strides in restoring the biodiversity of the ecosystem, and also contribute to overall grizzly bear recovery and enhance the probability of its long-term survival in the lower 48 states – where the NCE is the only ecosystem capable of supporting the species that is situated outside of the Northern Rockies.

Ecosystems where grizzlies are recovering show that people and bears can coexist. Millions of people live and recreate in grizzly bear country annually, and numerous highly effective educational outreach programs ensure that this could occur in the NCE. Embracing grizzly recovery in the NCE will focus additional energy and resources from around the nation on ensuring a future for both bears and the people who treasure the abundant natural values of the ecosystem. Recovery of the species will also stimulate positive economic impacts far beyond the reach of those partners immediately collaborating on the effort. Tourism industries anchored on the lower 48 State's two model ecosystems where grizzlies have recovered – the Yellowstone and the Northern Continental Divide Ecosystems – are a testament to the benefits that large, charismatic megafauna like grizzlies bring to communities, and moreover, to current and future generations of outdoors enthusiasts.

Sincerely,

Ryan Lutey

Executive Director

The Vital Ground Foundation 30 Fort Missoula Rd.

Missoula MT 59804 (406)549-8650 rlutey@vitalground.org

Full proposal and submission: <https://www.regulations.gov/document/FWS-R1-ES-2023-0074-0001>

FAQs (nice summary): <https://www.nps.gov/noca/upload/NCE-Griz-10j-FAQs-20230928-508.pdf>

November 9, 2023

U.S. Fish and Wildlife Service (via electronic submission)

Re: Proposed Rule: Establishment of a Nonessential Experimental Population of Grizzly Bear in the North Cascades Ecosystem, Washington State

The Vital Ground Foundation supports the agency's proposed rule to establish a nonessential experimental population of grizzly bears to its historical range in the North Cascades Ecosystem under the Endangered Species Act. Vital Ground alternatively supports restoring the NCE grizzly population without an experimental population designation and varying the number and frequency of proposed grizzly bear releases into the NCE to achieve the restoration goal in a shorter time period. We are strongly in favor of the proposal to exclude the northeastern portion of Washington State from the experimental designation to offer more robust protection for grizzlies expanding out of the Selkirk Ecosystem Recovery Zone.

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