March 9, 2017

Karen Taylor-Goodrich; Superintendent
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 98284

Dear Superintendent Taylor-Goodrich:

With this letter the Yakama Nation is providing comment on the Draft Grizzly Bear Restoration Plan / Environmental Impact Statement within the North Cascades Ecosystem (NCE) being proposed by the National Park Service and Fish and Wildlife Service. As you are aware the Yakama Nation takes great interest in the fish and wildlife within our usual and accustomed places of which the NCE is a part. Under the Treaty of 1855, the Yakama Nation retained the rights to fish, at all usual and accustomed places and hunt and gather on open and unclaimed areas. Because of these treaty rights, the Yakama Nation is recognized as co-managers, along with the State of Washington, of the fish and wildlife species and their habitats on these lands.

The Yakama Nation’s position has always been that all native species must be protected from extirpation. The Yakama Nation, therefore, supports the efforts of the National Park Service and Fish and Wildlife Service to restore grizzly bears (wapaan-lá) within the NCE.

While at this time we do not support a particular alternative, we do support the idea of transplanting grizzlies into the NCE. We do however, have concerns. We are concerned for the safety of our tribal members where contact with grizzlies could occur while exercising their treaty rights within the NCE. We agree that the likelihood of human-grizzly bear interactions would be low during the first few years of any of the action alternatives. However, we want to stress that long-term, with a recovery goal of 200 bears in the NCE, interactions likely would become more common. Providing educational information to tribal members on how to safely utilize the forest in the presence of grizzlies will be important as translocations begin.

Yakama Nation is also concerned with the large number of bears to be translocated within a short duration (25 years) proposed for alternative D without having an adaptive management plan. We believe that the cautious approach of Alternative B or C with adaptive management is preferable.

The plan states, as the number of bears increase and disperse it is unlikely that a meaningful proportion of the released population would leave the NCE. A meaningful proportion is left undefined and there needs to be further discussion as to how this likelihood was determined. The safety of our tribal
members within the Yakama Reservation and usual and accustomed places is paramount. There needs
to be further discussion as to how grizzlies are tracked, especially when they disperse outside the NCE, after radio collars fail. Our tribal members should be informed as to whether grizzly bears have dispersed into the Reservation. We request transparency and consultation with regards to information sharing of grizzly bear dispersal to the southern Cascades.

Thank you for the opportunity to comment on the grizzly bear restoration plan. We look forward to further discussion with you as the plan is refined and implemented.

Sincerely,

JoDe L. Goudy
Tribal Chairman
Confederated Tribes and Bands of the Yakama Nation