

The Honorable Doug Burgum  
Secretary  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

Dear Secretary Burgum,

We have significant concerns over the Joint Record of Decision announced by the National Park Service and Fish and Wildlife Service on April 25, 2024, to introduce grizzly bears into the North Cascades Ecosystem (NCE) in Washington as a nonessential experimental population (NEP) under section 10(j) of the Endangered Species Act. We respectfully request reconsideration of the decision on behalf of our members and signors.

There are two main problems with the 10(j) approach. The 1982 Grizzly Bear Recovery Plan identified 6 habitat areas which includes the NCE as restoration and recovery habitats. These habitats are considered long term recovery zones that also provide long term support for the species and maintain an area where it is possible to have reduced human-bear conflict. The fact that the NCE 10(j) recovery plan expects and plans on bears spreading throughout the rest of the state of Washington to find other habitat is contrary to specificity outlined in the 1982 Grizzly Bear Recovery Plan. Farmer, rancher and employee wellbeing will be put in peril with the introduction of bears that naturally migrate outside of the NCE.

The second issue is regarding the requirement that a 10(j)-population designation must be wholly separate geographically from non-experimental populations of the same species. Zones 2 and 3 of the NCE are contiguous to the Selkirk Range habitat area which inhabits an existing experimental population of grizzlies. The introduction of a NEP to the NCE is prohibited because the recognized habitat is not geographically distinct from experimental populations of bears in the Selkirk Range which will lead NEPs mixing with experimental populations. Access also exists to grizzly populations in British Columbia which are geographically connected with the NCE. The Onion Creek<sup>1</sup> grizzly bear traveled from the Selkirk Range west in zone 2 toward the Columbia River in Washington before being captured<sup>2</sup>. Drawing a line on a map separating the 10(j)-habitat area boundary from the Selkirk Range does not meet the definition of geologically separate NEPs.

Landowner concerns have not been adequately addressed throughout the process and numerous liability situations remain unresolved. The most egregious problems occur in the agricultural sector. The shoulders of the west and east sides of the NCE contain a significant portion of our agricultural production due to more temperate climates and water availability. Crops produced in these areas include everything from grains to tree fruits and berries. There is already a significant problem with black bears raiding orchards and beehives which prevent employees from entering and earning a wage. The cost of electric fencing and other deterrent measures for these crops will be costly to growers. Washington Administrative Code requires that employers provide safe and healthful workplaces for all employees<sup>3</sup>. Employers currently do not have a mechanism to provide such safety when dealing with

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<sup>1</sup> [Grizzly bear captured north of Colville | Spokane News | khq.com](#)

<sup>2</sup> "Selkirk Mountains Grizzly Bear Recovery Area 2023 Research and Monitoring Progress Report," by Wayne F Kasworm, et.al., 2024, United State Fish and Wildlife Service Grizzly Bear Recovery Coordinator's Office University of Montana, p. 29

<sup>3</sup> Wash. Admin. Code tit. 296, § 800 (2024).

predators such as grizzly bears, a transient species, that can enter an orchard block at any time during a shift where employees are often harvesting produce alone.

Ranchers are already dealing with state listed endangered wolves with a high predation rate on livestock. Significant grazing leases on National Forest lands and private grazing lands exist within the NCE and the addition of grizzly bears will further burden livestock production with immeasurable losses related to stress and infertility<sup>4</sup>.

The NCE and the Cascade Range to the south is a major recreational area for the cities and towns along both sides of the Cascade crest. The impacts on outdoor activities such as backpacking, day hiking and the major trail systems such as the Pacific Crest Trail could be significant, as these areas possess similar habitat as defined in the NCE. The introduction of grizzlies to the NCE will likely result in bears naturally migrating south leading to potential negative human-bear interactions. Similarly, there are significant private inholdings within the NCE. Access to private properties and private timber lands could be restricted due to grizzly presence. As bear populations increase the functional use of private lands decreases, implying potential takings issues.

The proposed reintroduction of grizzly bears will negatively impact livestock and tree fruit producers while simultaneously forcing families to move and shift communities away from agriculture-based economies in rural areas. Our members in Washington grow safe and abundant food for our nation and the world while also maintaining soil health, diverse habitat and fire suppression through grazing. Introducing grizzlies to Washington, a state already saturated with apex predators, will increase the stress on employers and employees, threatening the viability of agriculture and forestry, disproportionately affecting farmers, ranchers and recreationalists. We urge you to terminate this record of decision and not introduce grizzlies to the NCE or the state of Washington.

Sincerely,



Rosella Mosby  
President, Washington Farm Bureau

*Board of County Commissioners  
Chelan, Washington*

*Kevin Overbay, District 1*

*Shon Smith, District 2*

*Brad Hawkins, District 3*

*Board of County Commissioners  
Okanogan, Washington*

*Jon Neal, Chairman*

*Andy Hover, Member*

*Nick Timm, Member*

*Cattle Producers of Washington*

*Washington Cattlemen's Association*

*Washington State Dairy Federation*

*Washington State Sheep Producers*

*Washington State Tree Fruit Association*

*Yakima-Klickitat Farm Association*

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<sup>4</sup> "Modeling Large Carnivore and Ranch Attribute Effects on Livestock Predation and Nonlethal Losses," Rangeland and Ecology Management. 6/2018.