



**Comments: North Cascades Grizzly Restoration Plan, EIS**

**Submitted: November 12, 2023**

**This comment is from the Yakima/Klickitat County Farm Bureau (Y/KCFB). Y/KCFB is a grass roots organization whose members consist of farmers and ranchers with operations both large and small as well as other folks with interest in agriculture affairs.**

**For the record, the Y/KCFB is a signatory to the Okanogon County Farm Bureaus comments and also fully supports the submissions of the Washington State Farm Bureau and the American Farm Bureau Federation on this matter. This comment is a supplement to comments we have endorsed above.**

**The Y/KCFB position on Grizzly Bear introduction is that we strongly oppose this plan as well as any other proposal to move or encourage the species to inhabit the North Central Cascades of Washington state. We feel that our state is much too populated and it's agriculture far too developed to entertain a grizzly program.**

**There are also several serious natural resource concerns including salmon and bull trout recovery. Tremendous amounts of public treasure has been expended in the goal of recovering salmon and other species such as bull trout (both endangered species) as well as land use and water use restrictions that have been metered out to private and public entities for the purpose of restoring them. The salmon and bull trout's ability to reproduce will be far exceeded by the grizzly's appetite for them. Further, any federal agency's best efforts to convince this bear species to not substantially dine on them will be ineffectual.**

**The burden on agriculture with respect to salmon and bull trout recovery has been out of proportion to that of the general public share in fish restoration so**

**it should be to no one's surprise that our sector of the economy (agriculture) would be adamantly opposed to the wholesale consumption of their populations by these bears.**

**The impacts on wild game such as deer, elk and big horn sheep have not been properly considered. The current population of cougars, wolves and black bears threaten these game populations. This, combined with disease problems have caused the Washington Wildlife Commission to add restrictions to the big hunting seasons. Adding grizzly bears to Washington state will only further exacerbate the loss of big game.**

**The Y/KCFB believes the assertion that grizzlies are valuable for scattering seeds is incorrect. It is scientifically proven that ungulates pass considerable quantities of viable seed through their stools. Also, since ungulates are herbivores, they consume vastly more vegetation than grizzlies and thus would intake far more seeds than a bear. Since bears are monogastric, it is questionable in regards to how much seed a bear ingests that passes as viable. Thus, ungulates that grizzlies kill and eat are the number one distributors of seed and a dead ungulate can not scatter seed. A grizzly that has eaten that ungulate will likely scatter some seed by it being transporting it in its fur but the ungulates are also responsible for scattering seed that way as well. The Y/KCFB believes that ungulates scatter vastly more seed than grizzlies could possibly be credited with. The Y/KCFB also believes that the argument that grizzlies are needed to scatter seed where the facts show otherwise, is in fact more based in politics than reality.**

**The Y/KCFB is also concerned with the direct impacts to our ranchers and farmers because grizzly bears pose an imminent threat to grazing animals and farming operations alike. Many of our members raise livestock which are already being targeted by two other apex predators, cougars and wolves. Adding a third and much more dangerous predator as the grizzly would be beyond the pale, particularly with falling wild prey numbers. The grizzly also threatens crops, particularly fruit and some vegetable crops. Grizzly bears are omnivores and savor fruit. A fruit crop is only part of the target to a grizzly however as they damage trees, vines, game fencing and scare off the workers**

**(we hope that is all) as they attempt to care for the farm. Buildings storing crops are also targets (imagine the door on a large bin of grain being broken open by a grizzly – it’s happened). Even the most essential honey bee is a target and bee keepers tell that while electric fencing around the hives is fairly effective with most black bears, all bets are off with grizzlies.**

**Personal safety of our members, their families, their employees and the general public is also a grave concern to the Y/KCFB. Given the restricted land mass of Washington state, introducing grizzlies in the North Cascades is not just unwise – it is beyond foolish. Besides a very well developed agriculture sector in our state, there are a number of large heavily populated and industrialized areas very close to the intended reintroduction area. This area is known as the Puget Sound and there are extensive urban and suburban areas there. The distance from the proposed introduction area is proximate to Puget Sound. A compounding factor is the nature of the climate and the resultant lush and dense vegetation which precludes a wayward grizzly from being aware it has strayed into a human habitat until it is “too late”. Dangerous encounters between grizzlies and humans will occur frequently if the USF&WS and the NPS moves forward with this plan since much of suburbia is nestled right into the dense tree growth.**

**Further, due to our high human population and our citizens love of the outdoors, a great amount of recreation occurs in the mountainous regions of Washington state and that will also increase human/grizzly encounters.**

**As the agency study of this plan has revealed, Grizzlies are notorious for going “walk about” and the documentation points out that these bears WILL roam the entire State as a result of its implementation. Since the true area of impact is the state as a whole and the agencies document that, the USFWS/NPS must delay the process and now scope the entire state. It’s the law! Not doing so is malfeasance in the opinion of the Y/KCFB.**

**This comment from the Y/KCFB is the third time we have done so on this precise issue. Our comments were previously submitted in 2019 and 2022. Our Farm Bureau asks how many laws are the respective agencies violating by changing**

**direction and attempting to move forward yet again after failed attempts and course reversals since this issue surfaced?**

**The Y/KCFB believes that if there is a state that is the best example of one where grizzly bears should not be introduced, Washington state gets top honors. We have neither the land mass, nor the sparseness of humans or lack of agriculture for one to contemplate releasing grizzlies. *Further, we certainly do not have the sustaining wild game resources compared to areas that have grizzlies such as Wyoming, Idaho or Montana.***

**The Y/KCFB urges the USF&WS to abandon its plan to introduce grizzly bears into Washington state.**

**Sincerely,**

**Mark Herke**

**President, Yakima/Klickitat County Farm Bureau**