

Testimony  
on behalf of the

**National Cattlemen's Beef Association,  
Washington Cattlemen's Association,  
and  
Public Lands Council**



with regard to:

*“Understanding the Consequences of Experimental Populations Under the Endangered Species Act (ESA)”*

submitted to the House of Representatives Natural Resources Committee  
Subcommittee on Oversight and Investigations

Chairman Paul Gosar  
Ranking Member Maxine Dexter

submitted by:

**Kent Clark**  
Manager  
Double R Ranch

Tuesday, March 4, 2025  
Washington, D.C.

**Testimony of Kent Clark, Double R Ranch Manager  
Tuesday, March 4, 2025**

## House Natural Resources Subcommittee on Oversight and Investigations

Chairman Gosar, Ranking Member Dexter, and Members of the Subcommittee, thank you for the opportunity to provide testimony on "*Understanding the Consequences of Experimental Populations Under the Endangered Species Act (ESA)*." My name is Kent Clark, and I am the manager of the Double R Ranch, a member of the National Cattlemen's Beef Association, a member of the Washington Cattlemen's Association, and a member of the Public Lands Council. Since 1925, the Washington Cattlemen's Association has developed a statewide, grassroots organization that devoted itself to promoting agriculture and the cattle industry, and today, 95 years later, it remains the hallmark of our association.

I welcome this opportunity to share my perspective with members of the Subcommittee on the consequences that experimental populations under 10(j) of the Endangered Species Act can have on rural areas throughout the West.

I grew up on a family sheep and cattle ranch in a predominantly rural area of Eastern Oregon near the town of Burns. My parents and older brother still live and work there on a ranch that has been in our family since the late 1800s. Following graduation, I attended Oregon State University, earning a degree in animal sciences. I began my career as a ranch manager in the remote Southeastern Oregon community of Paisley. I managed a cattle ranch there for 13 years when I met and married my wife and started our family of four children. In 2011, I made a change and entered my current job managing the Double R Ranch in Loomis, Washington, which is in North Central Washington near the Canadian border. To say the least, I have been in the ranching business my entire life, and it is truly my passion.

The Double R Ranch is part of the Agri Beef Company based in Boise, Idaho. We are a family-owned operation that produces and sells high-quality premium beef. Our brands include St. Helens, Double R Ranch, and Snake River Farms Beef. Our products are served in some of the finest restaurants in the United States and worldwide.

The Double R Ranch is typical of most western ranching operations. We own a base property where cattle are kept during winter months and calving season. The balance of the ground that we utilize for summer grazing is a combination of Washington State's Department of Natural Resources (DNR) grazing permits and leases, U.S. Forest Service (FS) grazing permits, and Bureau of Land Management (BLM) grazing leases.

The total area for all these permits and leases is around 150,000 acres in the Loomis State Forest and the Okanogan National Forest, which are all on the eastern slope of the Cascade Mountain range. As we graze these cattle in the summer, we are responsible for maintaining all the fencing and other improvements and for moving the cattle with horses and dogs from one pasture to the next during the grazing season. The ranch employs a full-time crew of myself, my wife, and four others to accomplish the demands that come with ranching.

In April 2024, the U.S. Fish and Wildlife Service (USFWS or the Service) announced they intended to use section 10(j) of the ESA to introduce a nonessential experimental population (NEP) of grizzly bears into the Northern Cascades of Washington State. This action was followed by a public comment period. Meetings were held the previous year as attempts to introduce them without a 10(j), which failed. During this process, I submitted written and oral comments and gathered others

to submit comments in my role as Okanogan County Cattleman's Association President. At all the public meetings, the opposition to introducing these bears was overwhelming. Families were concerned about their farms, ranches, and children. The areas who would have bears in their backyard already had felt the impact of wolves for years, as state and federal agencies largely failed to mitigate impacts to these communities in wolf management efforts.

Despite this opposition and over the voices of those who represented the communities and knew the landscape best, USFWS personnel forged ahead with their plans and decided grizzly bears need to be a part of our lives in Washington State. In the final decision, the Service acknowledged they'd received comments opposing the introduction but made clear that these local perspectives were not important to the agency's decision. It felt like a parent telling a child, "Because I said so, end of story." For those of us on the ground, it seemed clear that the Service rushed the process, knowing that the end of the Administration's term was drawing near, and the outcome of the election was uncertain. There are so many examples of political gamesmanship in species recovery, but this case drew a clear line between regulatory burdens and political action.

The Okanogan Valley is home to many commercial apple orchards. All the growers I have visited with and heard testify were in opposition to another bear species coming to the area to destroy their crops and, worse yet, harm those working in the orchards. The North Cascades is lined by the Okanogan Valley on the east and the Skagit Valley on the West. Both are productive agricultural areas where grizzly bears could cause significant economic harm. For comparison, in 2023, it's believed grizzly bears were responsible for 82 livestock deaths in the state of Montana. According to Montana's Department of Livestock, \$211,721.98 was reimbursed to cover the loss of 145 animals in 2023. It is much easier for a grizzly bear to dine in an apple orchard or cattle than looking for scattered wild berries and other wildlife on a 20-degree slope. By introducing a 10(j) population, USFWS claims that they will be able to remedy this situation by removing bears that are causing problems in these areas. Unfortunately, USFWS has a poor track record of addressing those concerns in 10(j) species.

Based on my experiences with wolves, I remain skeptical that USFWS has the freedom to offer flexibility to manage impacts of populations, because they and the state have offered similar assurances for wolves to little effect. While I recognize that wolves are listed in the state under a different ESA class, the impact to my family and my livestock is still the same if there are predators that cannot be swiftly deterred from depredation. While wolves kill for sport, grizzlies kill for scale, and the combination would be devastating for family operations. Wolves do not respect "management areas," "state lines," "tribal boundaries," "private/public land boundaries," or any of the lines on a map that were drawn when the gray wolf introduction was proposed.

Despite the lines that were drawn, wolves are predators and will go where the food is available. The Double R Ranch is west of US Highway 97, which is one of those lines drawn, making it part of the Western Washington Management Zone. This means that even though we have three packs of wolves within 35 miles of my house in that zone, the entire zone breeding pair quota has not yet been met, and we must continue to live with the wolves being listed as an endangered species with limited to no flexibility. Our neighbors east of Highway 97 are managed by the Washington Department of Fish and Wildlife, so problem wolves can be managed even though it is still very restricted. On our ranch, we have no management action we can legally take if a wolf is caught in the act of attacking one of our animals. Throwing a rock at them would be considered harassing an endangered species and could lead to fines and prison time.

I am not saying this for dramatic effect. Last summer, one of my employees moved cattle on horseback with two border collie dogs. A pack of wolves came out of the trees, advanced towards them, and attacked his dogs. One was killed immediately, and the other managed to run off and went missing for 4 days before being located. He could do nothing to protect his dogs without risking immense fines and jail time. Without any deterrent tools, the wolves in our area have very little fear of human activity. We see them frequently in the middle of our calving areas in the spring, and they usually stand and watch you. Introducing grizzly bears into our backyard will only leave us dealing with the consequences of another apex predator.

USFWS claims that you will have the right to protect your livestock under attack on private grounds in the recovery area. However, what happens if they attack our livestock grazing on our permits or leases? Again, all we can do is contact USFWS personnel and hope they authorize the removal of the bear. Regardless, the cow, calf, horse, dog, or worse yet, ranch hand that was attacked will most likely not be able to fight for 2-5 business days. That is the time needed to get approval to remove the grizzly bear.

The ranch hands moving cattle, fixing fences, and tending to other tasks associated with caring for cattle will now be put in danger with little to no resources for managing the species. As I have detailed in my previous description of our operation, the cattle we run are all very valuable to our ranching operation, our overall company's bottom line, and over 100 other rancher's bottom lines. This does not even include all the distributors, restaurants, grocery stores, and butcher shops that handle our products. The implications these predators pose on our operations impact the supply chain. The genetic value of some of our animals is almost priceless when you put it into perspective. If that cow happens to be the one that the wolf or grizzly decides to kill for consumption, it can take years to try and recreate. It does not matter if they were introduced as a 10(j) population; the damage is done.

Our area has historically been one of the premier areas in the state for finding mule deer. I do not have any scientific data to put in front of you, but anecdotally, in the 14 years I have been here, I would guess that the mule deer population is 50% of what it was. The only real change in that amount of time has been the movement of wolves into our area. There were already significant populations of black bears and cougars, so adding another predator that uses deer as a portion of their diet has been dramatic. I am certain adding grizzly bears will not help that situation but will only further the decrease. As the deer population decreases, it is safe to assume that predation on livestock will increase.

In closing, section 10(j) - nonessential experimental populations need more oversight, collaboration with local communities, and management tools for those constantly interacting with the species. The track record of these decisions speaks for itself. Too many empty promises seem to be being made with the 10(j) filings that, in the end, are never actually being carried out. What we've seen with the wolf is rapid growth in populations across the West that don't adhere to lines on a map. Do we believe the bear will be any different?

Chairman Gosar, Ranking Member Dexter, and Members of the Subcommittee, I appreciate the opportunity to provide a review of the last several years and offer suggestions about how to build a stronger future for the coexistence of our operations and the wildlife on these lands.