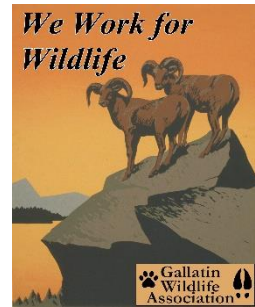


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May 7, 2020

Montana Grizzly Bear Advisory Council Facilitators:
Shawn Johnson
Heather Stokes

Re: Hunting Grizzly Bears in Montana

Dear Montana Grizzly Bear Advisory Council:

The Gallatin Wildlife Association (GWA) would like to thank each individual council member and the council itself for the time and effort all of you chose to provide the state of Montana in discussing the future management of grizzly bears. It has come to our attention that the council has been discussing the possibility of hunting (trophy hunting no less) of grizzly bears on public land. We would like to take this opportunity to comment on this discussion as currently being undertaken by the Governor's Grizzly Bear Advisory Council (GBAC).

GWA is a nonprofit volunteer wildlife conservation organization representing hunters, anglers and other wildlife advocates in Southwest Montana and elsewhere. Our mission is to protect habitat and conserve fish and wildlife. GWA supports sustainable management of fish and wildlife populations through fair chase public hunting and fishing opportunities that will ensure these traditions are passed on for future generations to enjoy. We as a wildlife organization do not see the hunting of grizzly bears being warranted due to the several reasons that we have detailed below.

Conflicting Aspirations:

As we begin, we note up front that there seems to be a discrepancy within the goals of Montana Fish, Wildlife and Parks (MFWP) on the overall management of grizzly bears. In the 2013 Grizzly Bear Management Plan for Southwest Montana¹, MFWP released their Final Programmatic Environmental Impact Statement (FPEIS). On page 6 under MFWP Goals for the Grizzly Bears, it mentions the Governors Roundtable's continued support of Primary Conservation Areas (PCA). It states the following:

“The group also recommended that the states of Wyoming, Idaho and Montana develop management plans for the areas outside the PCA to:

- 2. Support expansion of grizzly bears beyond the PCA in areas that are biologically suitable and socially acceptable,*
- 3. Manage the grizzly bear as a game animal including allowing regulated hunting when and where appropriate.”*

We believe Goals 2 and 3 conflict with each other. If you want grizzly bears to expand beyond PCAs into areas that are biologically acceptable, how can you manage the bear as a game animal and allow regulated hunting when and where appropriate? Those bears that are more likely to expand beyond PCAs are also the ones more likely to be shot because they are outside the protection of PCAs. GWA believes this policy is inconsistent to the overall goals it says it wants to achieve. If MFWP is serious about supporting the expansion of grizzly bears outside of PCAs, the goal of allowing the bear to expand must be achieved first, prior to the hunting of the species.

Goal number two above in MFWP document also matches what is found in the 2016 Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem². The first two visions listed in that strategy are summarized as stated.

- The PCA will be a secure area for grizzly bears, with population and habitat conditions maintained to ensure a recovered population is maintained for the foreseeable future and to allow bears to continue to expand outside the PCA.*
- Outside of the PCA, grizzly bears will be allowed to expand into biologically suitable and socially acceptable areas.*

The goals of these two documents support one another in that they are proposing to allow grizzly bears to expand outside PCAs. On the other hand, they also conflict each other by goal 3 in the FPEIS and the last goal in the Conservation Strategy of 2016 where it states on page 3 the following:

“Manage grizzly bears as a game animal; including allowing regulated hunting when and where appropriate.”

Before we move on, GWA would like to preempt the argument that this hunting goal will only be done in those areas where the number of bears are plentiful and so are the conflicts. The argument continues on with the thought this act would not affect the population. We counter that by saying, where’s the science proving that point? This sounds more like wishful thinking than anything else. Bears are generally solitary animals once arriving at adulthood and how do we know their wandering wouldn’t venture into areas outside PCAs?

Again, by managing the bear as a game animal before the species has reclaimed any of its original habitat or regained any connectivity is self-defeating. It will guarantee this iconic species will never achieve connectivity, will never achieve reclamation of its original territory outside of PCAs, and will never achieve social tolerance which is another goal of the MFWP and the GBAC. This inconsistency highlights a weakness in the strategy and the GBAC should not be giving credence to it.

Misguided Justification:

Back to the FPEIS, the document as stated on page 6 lists goals which it proclaims could best be achieved if they address “*human safety, nuisance bear management, livestock conflicts, property damage.*” GWA does not see the scientific evidence that the open-hunting of grizzly bears would help address or reduce any one of these human-grizzly conflicts. Where is the evidence that supports this summation? What ensures that open-hunting of grizzly bears would actually reduce the population of problem bears? For in this scenario, the bears that would be hunted would rarely be the same ones causing

conflicts. If nothing else, GWA believes that open hunting of bears would actually increase the human-grizzly conflict potential, posing a greater risk to human safety. We urge that the GBAC do not justify the necessity of hunting as a way to curtail bad bear behavior.

All of this has been said because there is this illogic and convoluted thought out there in the expanse of the universe that hunting will make bears learn to be afraid of humans. Before you devote too much thought into that idea, we should all know that bears are solitary animals. If you kill it, how is it going to learn? There was an interesting article in the Missoulian several years back, Nov. 30, 2017 to be exact, entitled “*Dead bears don’t learn anything – Biologists balk at notion hunting makes bears wary.*” This article by Perry Backus³ quotes Kim Annis, a MFWP grizzly bear management specialist from Libby, stating the following:

“If the argument is that hunting bears will teach them to be afraid of humans, I don’t understand how that would play out,” Annis said. “Bears are solitary animals. If someone kills one, it’s dead. It would have to stay alive to actually learn something.”

Think about this for a moment. There is not so much science in this, although if there is, it is perhaps the most basic science lesson of all. You have to be alive to learn. But it is common sense.

Now after having said that, we can think of scenarios where bears can learn people are a hazard to their health. Bears can learn to shy away from us. Bears are intelligent, yet solitary beings. But those scenarios would be the exception rather than the rule. We should not manage any wildlife species based upon exceptions. Perhaps a better way to state this is: it is very improbable that bears who are hunted can learn to avoid humans.

We feel that the Council would do better by spending their time on issues that promote safe habitat for grizzlies because bears are going to remain inhabitants on our public land for generations to come. The council would do better by providing information on how the public can better exist in harmony with this species. In fact, on page 6 of the FPEIS, there is the statement that to achieve those listed goals, it’s necessary that they address

the issues of “*habitat and restrictions on human use of bear habitat*”. We should be talking about how man can conduct himself on their land. We are the intruders in that scenario.

Establish Connectivity:

In Montana Fish, Wildlife and Parks’ GRIZZLY BEAR Management Plan for Southwestern Montana 2013 FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT¹, it lays out these preferred management approaches under the title of Future Distribution on page 41 and 42:

- *“Continue to monitor grizzly bear expansion from historically occupied areas along with changes in population numbers.*
- *Continue to address grizzly/human conflicts in areas outside the core recovery area in a manner that considers overall grizzly conservation as well as human safety and social tolerance.*
- *Continue to work with Idaho, Wyoming, and the Interagency Grizzly Bear Committee to address the issue of linkage between grizzly recovery areas and follow the goal set forth in the IGBC work plan to promote linkage between the GYA and the NCDE grizzly populations.*
- *Implement habitat programs that provide for wildlife needs to include working with the DOT to address issues of wildlife movement across roads (especially Interstates 90 and 15; and Highways 287, 191, 89, and 20).”*

Then on page 44, there is this statement:

“Management of non-conflict grizzly bears in areas between the NCDE management area and the DMA of the GYA (Figure 7) will be compatible with maintaining some grizzly occupancy. Maintaining presence of non-conflict grizzly bears in areas between the NCDE management area and the demographic monitoring area of the GYA, such as the Tobacco Root and Highland Mountains, would likely facilitate periodic grizzly movements between the NCDE and GYA.”

Here MFWP is suggesting locations that would actually enhance grizzly bear connectivity. Yet we are suspicious. We’re concerned that if a bear did actually appear on these lands, how likely is it that these bears would be shot? GWA assumes this likelihood would be greater than any other. The rationale would be someone felt threatened or that these bears were outside their normal range or habitat. In other words, MFWP is saying the right

thing, but can we as a people do the right thing. GBAC could spend more time in educating the public about what to expect as grizzlies explore lands outside of what has been their PCA.

GWA would now like to refer the GBAC to a MFWP document, 2019 Conservation Strategy for the Grizzly Bear in the Northern Continental Divide Ecosystem⁴. On page 29, there is this statement, perhaps the most optimistic view yet about grizzly bears establishing that genetic connection between the Greater Yellowstone Ecosystem and the Northern Continental Divide Ecosystem:

“Based on analyses of movements made by NCDE and GYE bears fitted with GPS collars, Peck et al. (2017) delineated potential movement paths that would provide the opportunity for male-mediated gene flow between the NCDE and GYE. Model predictions indicated that male grizzly bear movement between the ecosystems could involve a variety of routes, and verified observations of grizzly bears outside occupied range supported this finding. Peck et al. (2017) reported that the closest proximity between the estimated occupied range for these two populations was about 68 mi in 2014 and similar analysis indicated the distance decreased to 56 mi by 2016. This distance is within the range of maximum dispersal distances (42–109 mi) documented for populations in the Rocky Mountain region (Blanchard and Knight 1991, McLellan and Hovey 2001, Proctor et al. 2004), indicating that male dispersal between the populations is plausible. Human-caused mortality is a limiting factor for nearly all grizzly bear populations in the lower-48 States.”

GWA would like the GBAC to pay attention to that last sentence above. Grizzly bear connectivity is almost achieved, even without much if any assistance by man. Just think, a little effort by man in setting the right policy could go a long way to help reach that goal. Yet that last sentence comes back to haunt all of this potential:

“Human-caused mortality is a limiting factor for nearly all grizzly bear populations in the lower-48 States.”

So why would we want to jeopardize a goal that MFWP and nearly all conservation groups have been targeting for years. We may have decades to go before true connectivity can be reached, but if we allow hunting by any dimension, we fear that goal of establishing corridor connection could be lost for several future generations.

In Conclusion:

To properly manage the future of grizzly bear habitat, population, and distribution, state and federal agencies need to mitigate habitat loss, habitat fragmentation, climate change, loss of food sources, and to encourage and facilitate connectivity. Very little of this is being done. What progress has been made in the role of increased connectivity, very little of that can be traced back to the actions of man. Hunting, trophy or otherwise, will just detract from that progress and further hinder the goal of having this iconic species from re-establishing residency on their once historic range. Until that is done, grizzlies will be on the fringe of circulating the drain of extinction.

Dr. Jim Bailey⁵, a fellow board member of GWA, states this on his webpage:

“Montana (FWP 2013:49) asserts it is a long-term goal to allow bears in southwest and northwest Montana to reconnect through maintenance of “non-conflict” grizzly bears. However, this plan fails to note that hunting, including of non-conflict bears, will be contrary to achieving this goal.”

This is the belief of GWA as well. We have a hard time understanding how hunting can facilitate grizzly bear expansion, social tolerance, ensure a recovered population, or reach the goal of grizzly bear connectivity. Science does not draw that conclusion. Our common sense does not draw that conclusion, and our morality prevents us from justifying that conclusion.

Thank you for accepting our comments and giving us an opportunity to give voice on behalf of this great bear.

Sincerely,



Clinton Nagel, President
Gallatin Wildlife Association

Cited References:

1. Montana Department of Fish, Wildlife and Parks, 2013 Grizzly Bear Management Plan for Southwest Montana, Final Programmatic Environmental Impact Statement, 2013, page 6, 41, 42, 44.
2. 2016 Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem, 2016, page 3.
3. Backus, Perry, *Dead bears don't learn anything – Biologists balk at notion hunting makes bears wary*, The Missoulian, Nov. 30, 2017.
https://missoulian.com/news/local/dead-bears-don-t-learn-anything-biologists-balk-at-notion/article_930fd1e3-31ad-571c-ad30-78d11bcd3b73.html
4. Montana Department of Fish, Wildlife and Parks, 2019 Conservation Strategy for the Grizzly Bear in the Northern Continental Divide Ecosystem, 2019, page 29.
5. Dr. Jim Bailey,
<https://www.jamesabailey.com/Endangered%20Genes/Genetic%20Adequacy%20of%20Greater%20Yellowstone%20Grizzly%20Bears.pdf>