

August 3, 2020

Montana Fish, Wildlife & Parks
Montana Grizzly Bear Advisory Council
1420 East Sixth Avenue
P.O. Box 200701
Helena, MT 59620-0701

RE: Montana Governor's Grizzly Bear Advisory Council Consolidated DRAFT Recommendations 7/24/20

Dear GBAC Members,

Our organization is headquartered in Jackson, Wyoming, but we share a grizzly population with Montana through the Greater Yellowstone Ecosystem. What happens in Montana as a result of this council will most certainly have implications for grizzly bear management throughout the West. The Montana Governor's Grizzly Bear Council was convened, "to help set a long-term vision for bear management and conservation in Montana." After meeting for a year and accepting public input of nearly 17,000 comments, we are pleased that the council has made some significant headway for expanding the conversation and reach of coexistence measures but also concerned that the council has missed an opportunity for a more robust conversation around specifics for grizzly management. Below we highlight some of the more salient points we think the council got right and those where the council might have missed having diverse viewpoints and discussions.

We commend the council for including the following in the recommendations:

Thank you for including the recognition that grizzlies are appreciated worldwide to have intrinsic and ecological value. Recognition of the fact that grizzly bear management will require proactive measures with cooperation of many different agencies, tribes, and citizens is a huge step in the right direction. Being proactive will be the best use of resources and time as we seek to better coexist with grizzlies on the landscape. Including a diverse set of voices and ideas will also be important to achieve a drastic reduction in conflicts and grizzly bear mortalities.

The focus on education and outreach surrounding grizzlies is also a great accomplishment of the council's work. Celebrating grizzlies, promoting bear spray usage by all recreationists, funding a full-time bear education coordinator, and promoting the education and adoption of non-lethal tools are all important aspects of grizzly bear management that will encourage the public to be more aware of grizzlies as an integral part of ecosystems and the heritage of Montana.

When it comes to conflicts, the council has done a great job of promoting the research, development and use of non-lethal, conflict prevention tools. Securing funding for these tools and techniques will obviously be a big part of their success and we commend the council for including that in their recommendations. Preparing all Montanans to expect to have grizzly bears present across the entire state should be encouraged.

The following are areas that cause us some concern:

1. Effects of climate change on grizzly bear populations was not discussed in detail. No decisions were made on how to mitigate these effects and what impact they may have on grizzly populations into the future.

Possibly one of the biggest challenges to grizzly bear populations over the next 50 years, climate change looms large as a major threat to grizzly bear recovery in Montana and the Northern Rockies. No experts were invited to speak to the council on climate change effects on food sources, connectivity, or habitat. Whitebark pine and army cutworm moths are important food sources to grizzlies and are being severely impacted by climate change. Over the next 50 to 100 years, leading researchers (Berwyn, 2019; Grace, Beringer & Nagy, 2002) say that the alpine environments worldwide will see drastic declines along with an increasing tree line altitude which will mean less available habitat for important alpine species on which grizzlies rely. There is currently only one brief sentence about climate change and the impacts it will have on grizzlies. The recommendations provided by the council could have provided a pathway forward for the state to provide for mitigation of the effects of climate change. These effects must be considered in any management action in the future.

2. Limited exposure to a diverse set of researchers and experts.

The majority of wildlife managers, stakeholders, and experts that were brought in to speak to the council was limited in scope and mostly included personnel of Montana Fish, Wildlife and Parks. We appreciate the attempt by the council to include a diversity of voices, but there was a notable lack of independent scientists, grizzly bear advocates, and dissenting viewpoints. To truly have a robust conversation about the more controversial issues, an equal representation of voices should have been included.

3. The usual uncontroversial ideas gained consensus, the more contentious issues remain unresolved.

Ideas like increasing education, recommending people carry bear spray, and outreach and incentive programs for communities to be bear aware are all good recommendations but are mostly non-controversial. Areas where people feel most passionately about grizzly bear management were not resolved and remain open to interpretation by the state and Montana Fish, Wildlife and Parks. A vast majority of the public disagrees with and opposes trophy hunting for grizzlies, yet the council still refused to take a stand against it. The experts who spoke on hunting all agreed that hunting would not reduce conflicts and isn't an effective management tool. They also agreed that hunting would be used for recreational opportunity which an overwhelming number of U.S. citizens disapprove of. Science has proven that hunting grizzlies does not promote social tolerance for bears, and won't provide much revenue to the department.

4. Last-minute proposed recommendations imply there should be zones or areas of Montana where grizzly bears are disposable and inappropriate.

Recommendation 30 would charge FWP and "relevant entities" to identify areas that are not "critical to the long-term vitality of grizzly bears." All individuals are important to a species that is as slowly reproducing as grizzlies are. The entire state of Montana was historically grizzly bear habitat. If grizzlies are truly going to connect to other populations to ensure their genetic survival, then they must be

allowed to exist and travel through the entire state. Recommendation 30 should be withdrawn, as should Recommendations 28 and 29.

Further, guiding principle 9 suggests that grizzly bears east of the Rocky Mountain Front or north of I-90 do not contribute to connectivity of the four recovery zones and therefore will need “special attention” to be clearly articulated in a MTFWP grizzly management plan. This sets up the expectation that grizzlies are not necessary in these areas and therefore are expendable there despite many of these areas being critical for linkage between the Northern Continental Divide Ecosystem (NCDE) and the Yellowstone Ecosystem populations. It is inappropriate for the Council to recommend that MTFWP establish new “lines” or zones where grizzly bears are deemed unimportant/disposable and where their relocation or removal would be prioritized. Please remove guiding principles 9 and 15.

5. Best available science is referenced several times in the recommendations but not all available science is being used in decision making.

The recommendations state that Montana should utilize best available science from FWP, independent scientists, and Universities however the council was only exposed to a few independent researchers and University faculty. Future efforts to incorporate best available science should include a broader range of “grizzly bear experts” from both the U.S. and Canada. There are many independent scientists and university researchers who were not heard from during the council meetings. This provided a narrow view of the complexity of the issues surrounding grizzly bear management and left an incomplete picture for council members. Moving forward with grizzly bear management plans, all relevant and pertinent information should be included so that decision makers have the full suite of data available to them.

6. The council agrees that conflicts with grizzlies cannot be mitigated through hunting. Yet, in the current draft recommendations, language states, “[W]e encourage the take of bears where the desired outcome is a lower bear density, recognizing that it will not mean no bears in those areas, but where the management challenges are significant.”

If “management challenges” mainly include conflicts and the council acknowledges that conflicts cannot be prevented or reduced through hunting, then why does language exist in the recommendations that suggest hunting will reduce “management challenges?” The recommendations state, “Grizzly bears outside established recovery and connectivity zones should be managed more strictly than those inside the zones.” This is unnecessary if conflict prevention, education, and preparing people to coexist with grizzlies is a priority statewide. What exactly does “more strictly” mean?

7. Research on attitudes and social tolerance toward grizzlies in Montana is still incomplete without data being fully analyzed.

Nearly 17,000 comments were submitted to the council meaning that this issue is important to a lot of people. A full analysis should have been conducted on these comments so the council had a complete picture of information about public attitudes toward grizzly bear management. The social scientists who were brought in from the University of Montana were commissioned to provide an analysis of attitudes and social tolerance of the citizens of Montana toward grizzlies through a survey which is a great idea, however the study is incomplete and results are unpublished. There was a lack of other viewpoints from researchers who study social tolerance of wildlife species (for example, Dr. Adrian Treves).

Grizzly bear management is as much people-centric as wildlife-focused. Knowing how the public feels about topics such as hunting, connectivity, and coexistence is key to formulating recommendations that are reflective of the desires and wishes of Montana citizens. The above recommended data and study are important and should have been at the background of all discussions of the council as they formulated their recommendations. The recommendations agree that hunting is a values-based decision. Until the council is aware of what values are significant to Montana citizens, values based topic recommendations (such as hunting) should be postponed until the council has all the available data.

Thank you to all the council members who have put their time and effort into helping draft these recommendations that will be used to formulate a grizzly bear management plan for Montana. We are appreciative of the gains that have been made and hope you consider our above suggestions for changing the recommendations in order to strengthen them and include a wider diversity of viewpoints and public input.

Sincerely,

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References:

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