



Via Email

July 8, 2020

Governor Steve Bullock
1301 E. 6th Avenue
Helena, MT 59601

Martha Williams, Director
Montana Fish, Wildlife and Parks
1420 E. 6th Avenue
Helena, MT 59620

Re: Governor's Grizzly Bear Advisory Council Recommendations

Dear Governor Bullock and Director Williams,

Grizzly bear recovery in Montana, and the role that Montana plays in recovering grizzly bears beyond the state's borders, is a matter of significant interest to people across the state and nationally. Since the Grizzly Bear Advisory Council (GBAC) was created, many of our organizations have worked to engage the GBAC on behalf of that public interest, despite sometimes significant barriers to public involvement in the GBAC process including the COVID-19 pandemic. We recognize and appreciate the heavy responsibility that the GBAC has had in carrying out its charge to develop recommendations on the complex issue of grizzly bear management, in a very challenging time for the state and country.

We are writing to request a minimum two-week formal comment period on the GBAC's final draft recommendations, as well as widespread notice to the public of the comment period. We believe it is critical that the public be intentionally engaged at this juncture in order to provide meaningful input on the GBAC's final draft recommendations before they are finalized and sent to the Governor's office in August. The public should have the opportunity to comment on any additions or changes to the recommendations made during the final July 21-22 GBAC meeting; therefore the formal comment period should run for at least one week following the posting of the final draft recommendations that encompass the July meeting's deliberations on the GBAC website.

We believe this request is directly in line with the intent and mandate of the Executive Order creating the GBAC:

"WHEREAS, to ensure its citizens have a voice in the future of grizzly bears, Montana must provide meaningful opportunities for people to engage in a public discussion around grizzly bear management, recovery and conservation;

The Council shall utilize a transparent process that maximizes engagement among people with diverse values and interests. The Council shall consider public input on its recommendations.”

We understand that the public has had an opportunity to comment throughout the GBAC process through the FWP GBAC website/comment portal. However, it has been difficult for the public to follow where the GBAC is in its deliberations over the past several months; this difficulty has been exacerbated since March by the COVID-19 pandemic and (necessary) restrictions on public gatherings. We appreciate the GBAC's efforts to be transparent by posting various vision and draft recommendation documents on the web site; however, the documents are large, contain many edits and are confusing to the public. It has been difficult even for our organizations which have made a concerted effort to follow the GBAC process to understand the various versions of edited documents, and what exactly to comment on in the various stages of the Council's deliberations. Additionally, Council meetings (in person and virtual) have been held during the day, during the week, making it very challenging for interested members of the public who work during the day to attend and better understand the workings and progress of the GBAC. Only one evening session was held in Libby in February, as a result of requests made by some of our organizations. In the last several virtual meetings, there has been no opportunity for the public to engage in dialogue with Council members; questions can only be submitted through the FWP portal, which are then sometimes but not always read to the Council.

Given the COVID-19 pandemic, the racial justice movement, and other matters consuming the public's attention over the past several months, it is virtually certain that the vast majority of the public is not aware that the GBAC is nearing the end of its deliberations and is at a critical juncture, nor what the Council's final recommendations will be. Even if members of the public have engaged in the beginning stages of the Council's process, there is a significant difference between sending general comments months ago and having the opportunity to comment on the GBAC's final recommendations that will be presented to the Governor next month. It has been demonstrated that the public cares deeply about this issue and would want to be apprised, in a pro-active and meaningful way, of the Council's final recommendations after months of deliberations. Suggestions for pro-active public engagement include generation of media stories in local radio and print outlets, a press release, and other means to alert the public of this last opportunity to comment.

We also believe that it is critical that the public comments that have been submitted to date be analyzed and synthesized. Without such analysis, it is difficult to see how the GBAC could have a clear understanding of public input and desires on major themes of grizzly bear recovery and management. It is unreasonable to expect members of the GBAC to distill this voluminous information on their own. We suggest that this analysis be done by qualified University of Montana research staff.

Thank you for your consideration of our request for a formal comment period and corresponding adequate public notice on the GBAC's recommendations prior to their finalization.

Sincerely,



Bonnie Rice, Senior Campaign Representative
Sarah Pawlowski, Organizing Representative
Sierra Club



Andrea Zaccardi, Senior Attorney
Center for Biological Diversity



Jocelyn Leroux, Washington and Montana Director
Western Watersheds Project



Kristin Combs, Executive Director
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Nicholas Arrivo, Managing Attorney
Humane Society of the United States

Sarah McMillian, Conservation Director
WildEarth Guardians

cc: Charlie Sperry, Montana Fish, Wildlife and Parks
Heather Stokes
Shawn Johnson
GBAC members