



August 5, 2020

Grizzly Bear Advisory Council
Montana Fish, Wildlife & Parks
1420 E. 6th Ave.
Helena, MT 59620

Submitted by email for distribution to the entire GBAC to: shawn.johnson@mso.umt.edu;
heatherstokes@umconnect.umt.edu; dillon.tabish@mt.gov

To the members of the Grizzly Bear Advisory Council;

We submit these comments to supplement 2 sets of previously submitted comments on behalf of more than 20,000 members and supporters of WildEarth Guardians who took action to submit comments and sign on to our comments. It is necessary to provide this supplementation because the July 24 “Consolidated Draft Recommendations” included troubling changes.

On behalf of our members and supporters who have commented on these issues, we object specifically to Recommendations 18(e), 28, 29, and 30, as well as the so-called “Guiding Principles” 9 and 15. These all seek to encourage the creation of areas where grizzly bears are treated differently, where bears are considered unwelcome and would be “strictly managed.” Not only did these get included very late in the process, but the Council should not be creating killing zones for grizzly bears and Guardians asks the Council to reject these draft additions.

The science is clear: grizzly bears need connected habitat. Creating kill zones in those areas where connectivity is essential is counter to what is required for the grizzly bear to thrive and recover. Guiding Principle 9 runs counter to the 2018 NCDE Conservation Strategy that identified Zone 2 for connectivity between NCDE and GYE bears and to provide a connection to the Bitterroot where a population must eventually reestablish. MT FWP provided maps to this Council in November 2019 that explicitly identified the connectivity needs in the area that Principle 9 would deem unimportant for grizzly bears. This Council must not make recommendations to not protect grizzly bears in a way that contradicts what the Conservation Strategy and what FWP itself has recognized as important areas. Recommendation 30 inappropriately seeks to create new zones where grizzly bears would be removed. Again, this is

counter to what the science clearly requires for grizzly bear recovery. Even Zone 3 identified in the NCDE Conservation Strategy does not envision “discouragement” of grizzly bears and provides that bears will only be removed/relocated if conflicts occur that require that specific response. In Zones 2 and 3, conflict prevention is the first and best tool for coexistence.

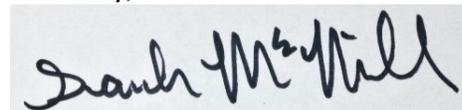
Recommendation 30 vaguely provides that FWP and “relevant entities” will identify where grizzly bears are not “critical to the long-term vitality of grizzly bears.” Who are these “relevant entities?” What does “long-term” mean? It is not the role of FWP or unidentified entities to make these determinations- the grizzly bear is protected under the Endangered Species Act and massive amounts of science has already determined what is needed for the grizzly bear to recover.

Guiding Principle 15 proposes that grizzly bears should not be in some areas of Montana. This conflicts with Principles 1, 2, and 5. And it is contrary to the idea of a recovered species. A recovered population should not be essentially fenced out of certain areas of Montana. Grizzly bears need to be allowed to expand back into larger areas of their historic range, not penned into only certain areas. Many of us live in Montana because we appreciate the biodiversity and wildness of our state. It’s part of what visitors appreciate as well. The Council should not be relegating some wildlife to only certain areas, but instead should be preparing the state to prevent conflicts.

The hunting section below the “Considerations” section contains some new contradictory and confusing language. The Council acknowledges that hunting is not an effective tool to prevent or reduce conflict, which is what the experts who you brought in to consult said. But then states that it encourages the “take of bears where the desired outcome is a lower bear density... where management challenges are significant.” If hunting – or “take” is ineffective as a conflict reduction, why would killing bears be encouraged where management challenges exist?

Thank you for considering these supplemental comments. Guardians asks the Council to remove the late-added Recommendations 18(e), 28, 29, 30 and Guiding Principles 9 and 15. We also request that you explicitly document how you considered public comment in developing your recommendations, vision, and guiding principles.

Sincerely,

A handwritten signature in black ink on a light gray rectangular background. The signature is written in a cursive, flowing style and appears to read "Sarah McMillan".

Sarah McMillan
Conservation Director
Wild Earth Guardians